

Mark B. Bezilla
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Docket Number 50-346
License Number NPF-3
Serial Number I-1490

April 10, 2007

Mr. James L. Caldwell, Administrator
United States Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Subject: Submittal of Independent Assessment Plan for the Davis-Besse Nuclear Power
Station Corrective Action Program Implementation - Year 2007

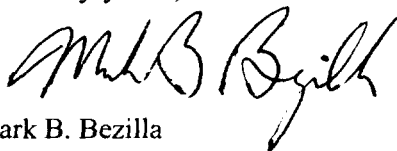
Dear Mr. Caldwell:

The purpose of this letter is to submit the assessment plan and related information for the year 2007 independent external assessment of the Davis-Besse Nuclear Power Station (DBNPS) Corrective Action Program (CAP) implementation. The Nuclear Regulatory Commission (NRC) letter, dated March 8, 2004, "Approval to Restart the Davis-Besse Nuclear Power Station, Closure of Confirmatory Action Letter, and Issuance of Confirmatory Order," (DBNPS letter Log 1-4524) requires submittal of the identity of the external assessment organization, including the qualifications of the assessors and the scope and depth of the assessment plan. This assessment plan is required to be submitted ninety (90) days prior to commencing the assessment.

In accordance with the Confirmatory Order, the FirstEnergy Nuclear Operating Company (FENOC) is submitting the independent Corrective Action Program Implementation Assessment Plan, including the identification and qualifications of the assessors. This Assessment is scheduled to commence on July 9, 2007, with the onsite portion of the assessment lasting approximately two weeks. A final debrief marking the end of the assessment will be conducted with the DBNPS staff within 14 days of completion of the onsite assessment. The final assessment report and action plans, if required, will be submitted to the NRC within 45 days after the final debrief.

If you have any questions or require further information, please contact Mr. Dale R. Wuokko, Acting Manager - Regulatory Compliance, at (419) 321-7120.

Sincerely yours,



Mark B. Bezilla

LJS

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Attachment

Enclosures

cc: USNRC Document Control Desk
DB-1 NRC/NRR Project Manager
DB-1 Senior Resident Inspector
Utility Radiological Safety Board

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Attachment 1
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COMMITMENT LIST

The following list identifies those actions committed to by FirstEnergy Nuclear Operating Company's (FENOC) Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Acting Manager - Regulatory Compliance (419-321-7120) at the DBNPS of any questions regarding this document or associated regulatory commitments.

<u>COMMITMENTS</u>	<u>DUE DATE</u>
None	N/A

Docket Number 50-346
License Number NPF-3
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Enclosure 1

Davis-Besse Nuclear Power Station
Independent Corrective Action Program
Implementation Assessment Plan – Year 2007

(8 pages to follow)

Corrective Action Program Implementation Assessment Plan

2007

NUMBER:

COIA-CAP-2007

ASSESSMENT AREA:

Corrective Action Program Implementation

PURPOSE:

The purpose is to provide the 2007 independent and comprehensive assessment of the Corrective Action Program implementation at the Davis-Besse Nuclear Power Station.

The assessment will be performed in accordance with the requirements of the March 8, 2004, Confirmatory Order Modifying License number NPF-3 and Davis-Besse Business Practice DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments." The assessment will be used to identify areas for improvement requiring corrective actions with action plans and areas in need of attention for other improvement opportunities. The assessment will also be used to assess the rigor, criticality, and overall quality of available Davis-Besse internal self-assessment activities in the implementation of the Corrective Action Program.

SCOPE:

The Independent Assessment Team will evaluate the following areas associated with the Corrective Action Program implementation since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program (August 26, 2006), as follows:

1. Identification, classification, and categorization of conditions adverse to quality
2. Evaluation and resolution of problems
3. Corrective action implementation & effectiveness
4. Trending program implementation & effectiveness
5. Effect of program backlogs
6. Effectiveness of internal assessment activities
7. Implementation of the Corrective Action Program by Engineering
8. Open corrective actions taken in response to the NRC Special Team Inspection – Corrective Action Program Implementation – Report 05000346/2003010
9. Corrective actions taken in response to the Areas for Improvement (AFI) and Areas in Need of Attention (ANA) identified during the previous independent assessments of the Davis-Besse Corrective Action Program Implementation.

The Assessment Team will conduct the following activities:

1. Identification, Classification, and Categorization of Conditions Adverse to Quality

The 2007 Independent Assessment Team will review activities to assess the effectiveness of the identification, classification, and categorization of Conditions Adverse to Quality for issues identified since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program (August 26, 2006), including:

- a. Review and evaluate the identification, classification, and categorization of at least twenty-five (25) selected Condition Reports categorized after Management Review Board (MRB) review.
- b. Review a sampling of SAP non-maintenance notifications initiated since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program (August 26, 2006) to determine if the conditions were properly categorized. Analyze these notifications for issues which should have been identified as Conditions Adverse to Quality but were not or were only partially identified.
- c. Interview at least ten (10) individuals from various parts of the Davis-Besse Nuclear Power Station's management and staff. Ascertain the Davis-Besse Nuclear Power Station staff's commitment to the Corrective Action Program, the extent of their understanding of the Davis-Besse Nuclear Power Station's problem identification process, and their willingness to report problems.
- d. Evaluate the adequacy of the Davis-Besse Nuclear Power Station's identification, classification, and categorization of a minimum of twenty (20) corrective actions for sharing operational experience feedback with the industry.

2. Evaluation and Resolution of Problems

The Assessment Team will perform an analysis of at least five (5) selected issues or problems that have gone through the entire applicable Corrective Action Program process, to identify strengths and weaknesses in their evaluation and resolution. The Assessment Team will:

- a. Analyze the Full Apparent Cause or Root Cause evaluation of at least five (5) selected Condition Reports.
- b. Analyze the problems selected above, including cause identification and appropriateness of corrective actions. Determine the Davis-Besse Nuclear Power Station's effectiveness in implementing the Corrective Action Program.
- c. Identify any strengths or weaknesses to responses found during the detailed analysis above.

3. Corrective Action Implementation & Effectiveness

The Assessment Team will perform an analysis of Conditions Adverse to Quality corrective action implementation and effectiveness since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program (August 26, 2006). The Assessment Team will:

- a. Evaluate the timeliness of corrective actions for at least twenty (20) Condition Reports.
- b. Review the number of repeat condition reports and corrective actions and evaluate the effectiveness of corrective actions.
- c. Evaluate the adequacy of the Davis-Besse Nuclear Power Station's implementation of corrective actions for operational experience feedback from the industry.
- d. Review the activities of the Corrective Action Review Board (CARB) and evaluate the effectiveness of the CARB.
- e. Evaluate the Davis-Besse Nuclear Power Station's Corrective Action Program for broad implementation problems, if the above review indicates the potential for such problems.

4. Trending Program Implementation & Effectiveness

The Assessment Team will assess the site's implementation of existing trending programs.

5. Effect of Program Backlogs

The Assessment Team will perform an analysis of the effect of program backlogs on organizational and operational effectiveness. The Assessment Team will:

- a. Review program backlogs and the trend of the backlogs.
- b. Evaluate the impact of the backlog and backlog trend on organizational and operational effectiveness.

6. Effectiveness of Internal Assessment Activities

Self-Assessments

The Assessment Team will evaluate the effectiveness of the Davis-Besse Nuclear Power Station's self-assessment activities associated with the implementation of the Corrective Action Program. The Assessment Team will:

- a. Review the results of Davis-Besse Nuclear Power Station audits/reviews conducted since the 2006 Independent Assessment of the Corrective Action Program. Determine if the audits/reviews were comprehensive and whether effective actions were taken to correct problems or weaknesses identified.
- b. Evaluate the effectiveness of self-assessment capability by reviewing findings and corrective actions associated with at least five (5) of the following:
 - i. Self-assessment reports

- ii. Audits/reviews (including audits/reviews of both onsite and offsite safety committee activities)
- iii. Evaluations conducted on the implementation of the Corrective Action Program since the 2006 Independent Assessment
- c. Determine if the Davis-Besse Nuclear Power Station is aggressive in correcting self-assessment findings on the implementation of the Corrective Action Program by determining whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results.
- d. Interview at least four (4) selected individuals involved with the oversight function, as well as the audited organization, to gain their insight on the effectiveness of their effort and the responsiveness of FENOC management and staff to issues raised.

Onsite and Offsite Safety Review Committee Activities

The Assessment Team will evaluate the effectiveness of the safety review committees' oversight of the implementation of the Corrective Action Program since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program (August 26, 2006) by reviewing committee minutes, audits/reviews, or other actions initiated by the committees as they relate to risk significance or major corrective action successes or failures. The Assessment Team will review the following, as necessary:

- a. Identify what issues are reviewed by the safety review committees and review at least five (5) actions initiated by the safety committees to identify, assess, and correct areas of weakness
- b. Review audits/reviews of the Corrective Action Program conducted since the last Independent Assessment under the cognizance of the offsite safety review committee and determine if the audit/review findings were consistent with such external assessments as INPO, NRC, and consultants
- c. Evaluate the Davis-Besse Nuclear Power Station's follow-up to ten (10) items, if available, on the Corrective Action Program identified by the safety review committees, including committee-initiated audit/review findings and any recurring problems.

7. Implementation of the Corrective Action Program by Engineering

The Assessment Team will evaluate the effectiveness of the implementation of the Corrective Action Program by the Engineering Department. Portions of this evaluation may be included in assessment activities addressed in areas 2, 3, 4, and 6. Areas to be reviewed during the 2007 assessment will include the following, as appropriate:

- a. Promptness in initiating Condition Reports for identified conditions adverse to quality
- b. Condition Report ownership and appropriate initiator involvement
- c. Quality of root and apparent causes produced by Engineering and associated management behavior and guidance
- d. Prompt acceptance of corrective actions

- e. Corrective action quality and implementation timeliness
- f. Effectiveness of corrective actions to prevent recurrence
- g. Support of corrective actions assigned to others
- h. Workload management and backlog management

8. Evaluate any Open Corrective Actions taken in Response to the NRC Special Team Inspection – Corrective Action Program Implementation – Report Number 05000346/2003010

The Assessment Team will conduct an evaluation of the open corrective actions taken in response to the NRC Special Team Inspection – Corrective Action Program Implementation – Report 05000346/2003010. The 2007 Independent Assessment Team will identify individual strengths, weaknesses, or slow responses found during an analysis of the open items.

9. Review of Corrective Actions from Previous Independent Assessment of the Davis-Besse Corrective Action Program

The Independent Assessment Team will review existing open Corrective Actions and SAP items developed in response to “Areas in Need of Attention” and “Areas for Improvement” from the previous independent assessments. The 2007 Independent Assessment Team will identify individual strengths or weaknesses to responses found during an analysis of the open items.

INDEPENDENT ASSESSMENT TEAM (Biographies attached):

- Jon Johnson, Advanced Technologies and Laboratories International (ATL), On-Site Lead Investigator
- Marquis P. Orr, ATL, Team Leader
- Paul D. Swetland, ATL, Senior Reviewer
- David W. Barker, Cooper Nuclear Station, Independent Industry Peer
- Kim Kieler, South Texas Project, Independent Industry Peer
- Wayne Rheume, James A. FitzPatrick Nuclear Power Plant, Independent Industry Peer

SCHEDULE:

Date	Activity
June 1, 2007	Distribute selected documentation to the CAP Assessment Team members to begin offsite review
June 4 to July 9, 2007	Preparation Period - Offsite (in-office) review of Davis-Besse material in preparation for onsite assessment
July 9, 2007	CAP Assessment Team will assemble at plant site to begin site assessment activities
July 9 to July 20, 2007	CAP Assessment Team performs onsite assessment; Assessment Team provides Davis-Besse with preliminary findings during debrief meeting
August 3, 2007	Draft report from CAP Assessment Team delivered to Davis-Besse for review and comment; final debrief meeting (marks completion of assessment)
August 10, 2007	Davis-Besse comments incorporated and final CAP Assessment report delivered to Davis-Besse management

Final assessment report and Davis-Besse action plans (if required by findings) will be submitted to the NRC within forty-five (45) days of the completion of the assessment.

ASSESSMENT METHODS:

The Independent Assessment Team will use an approach similar to the NRC Inspection Procedure 40500, "Effectiveness of Licensee Process to Identify, Resolve, and Prevent Problems," and NOBP-LP-2001, "FENOC Self-Assessment/Benchmarking," to evaluate the effectiveness of the implementation of the Corrective Action Program.

The assessment methodology may include any combination of the following:

- Observing activities
- Interviewing personnel
- Reviewing documentation
- Evaluating or performing trend analysis
- Reviewing procedures, instructions, and programs
- Comparing actual performance levels with pre-established performance indicators

The following general standards of acceptable corrective actions will apply to the assessment of Davis-Besse Corrective Action Program implementation:

- The problem is identified in a timely manner commensurate with its significance and ease of discovery
- Identification of the problem is accurate and complete and includes consideration of the generic implications and possible previous occurrences

- The problem is properly prioritized for resolution commensurate with its safety significance
- The root causes of the problem are identified and corrective actions are appropriately focused to address the causes and to prevent recurrence of the problem
- Corrective actions are completed in a timely manner

The assessment team will review the referenced procedure/documents during the Preparation Period prior to site arrival.

The Assessment Team will identify, as applicable, Areas of Strength, Areas in Need of Attention, and Areas for Improvements as defined in the current revision of Davis-Besse Business Practice DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments." The Team will provide an overall concluding statement on the effectiveness of the Corrective Action Program implementation using the rating categories of DBBP-VP-0009.

REFERENCES:

NRC Inspection Procedure 40500, "Effectiveness of Licensee Process to Identify, Resolve, and Prevent Problems"

NOP-LP-2001, "Corrective Action Program"

NOBP-LP-2001, "FENOC Self-Assessment/Benchmarking"

NOBP-LP-2007, "Condition Report Process Effectiveness Review"

NOBP-LP-2008, "FENOC Corrective Action Review Board"

Davis-Besse Business Practice DBBP-VP-0009, "Management Plan for Confirmatory Order Independent Assessments"

Condition Reports and CR Trend Reports, August 26, 2006, through July 2007

Past NRC Inspection Reports that are applicable to the area assessed

Past applicable Self-Assessments

QA quarterly assessments for past four quarters

Related Operating Experience since the 2006 Independent Assessment of the Davis-Besse Corrective Action Program


CNRB meeting minutes from last four CNRB intervals

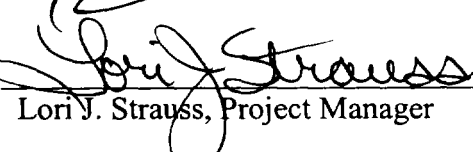
Field Observation Reports

Applicable Section or Area Performance Indicators

Previous Independent Assessment Reports and Action Plans (subsequent to first annual assessments)

ASSESSMENT PLAN APPROVALS:

Prepared by:  Date: 3/26/2007
Marquis P. Orr, ATL Team Leader

Approved by:  Date: 4/5/07
Lori J. Strauss, Project Manager

Approved by:  Date: 4/6/07
Jeannie M. Rinckel, Executive Sponsor

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Enclosure 2

Davis-Besse Nuclear Power Station
Independent Corrective Action Program
Implementation Assessment – Year 2007

Assessors and Qualifications

(7 pages to follow)

Jon R. Johnson
Senior Executive Consultant
ATL International, Inc.

- **2003-Present: *Senior Executive Consultant-Nuclear Safety***
Member of Off-Site Safety Committee for major US nuclear utility providing advice and guidance on reactor safety and engineering management. Provide regulatory and technical advice to major reactor vendor on Design Certification. Provide management advice and conduct safety assessments for US DOE. Senior safety and security advisor to the NRC's Office of the Executive Director for Operations. Provided advice on risk-informed licensing approaches and inspection techniques for international regulators and utility managers. Chair of Executive Assessment Board for DOE M&O contractor. Member of Executive Team providing regulatory advice and licensing guidance for a geological spent fuel repository for the Department of Energy. Principal expert speaker at nuclear utility manager and regulatory agency workshops for the IAEA. Advise nuclear industry regarding advanced reactor engineering, design and safety policy.

- **1978-2003: *Senior Executive, US Nuclear Regulatory Commission***
Deputy Director, Office of Nuclear Reactor Regulation - managed NRC's headquarters program office functions for all operating reactors and research reactors in the US including licensing, engineering/technical review, inspection and oversight programs (ROP), license renewal, maintenance rule implementation. Responsible for training; assessment of operations, maintenance, corrective action programs; enforcement; and emergency response. Supervised development of risk-informed regulations, and operator licensing, advanced reactor licensing, and generic Technical Specification development. Provided advice on policy matters to the NRC Commissioners, the Congress, and the White House. Directly managed implementation of NRC's Reactor Oversight Process (ROP) including engineering/ technical review, inspection, assessment, enforcement, security, and emergency response functions for all NRC's operating reactors in the northeast (Region I) and southeast (Region II). As a senior nuclear safety and engineering consultant, provide advice to national and international nuclear utility and governmental managers regarding nuclear reactor licensing and inspection policy. Advise the nuclear industry regarding advanced reactor policy.

- **1970-1978: *Nuclear Trained Officer, United States Navy***
Reactor Mechanical Assistant on nuclear-powered ship, in charge of dual-reactor operations and assessment of nuclear mechanical systems, chemistry and radiological control programs. As Director, Reactor Principles, supervised 15 instructors and 800 students in course of instruction for the application of nuclear physics to a nuclear power plant. Directly supervised and operated reactors at sea and during a refueling overhaul.

Marquis P. Orr
Senior Program Manager
ATL International, Inc.

- 2000 – Present: *Advanced Technologies and Laboratories International, Inc. (ATL)*, Team member and project manager for performance assessments and site evaluations at U.S. Department of Energy (DOE) and U.S. Department of Defense (DoD) facilities. Supported development of U.S. Nuclear Regulatory Commission (NRC) safety analysis reports (SAR) and environmental impact statements (EIS) for license renewal and new construction applications. Responsible for development of draft regulatory guides and standard review plans to assist NRC staff with review of license renewal applications. Assisted FirstEnergy with independent assessment of the corrective action programs at Beaver Valley Power Station and Davis-Besse Nuclear Power Plant.
- 1992 – 2000: *Science Applications International Corporation (SAIC)*, Joined SAIC to assist DOE with program development for inspection, decontamination, decommissioning, and disposal of obsolete and formerly utilized nuclear weapons buildings and facilities. Assisted DOE Headquarters with the development of intra-departmental administrative procedures to standardized activities for construction project reporting between DOE headquarters, field offices, and laboratories. Reviewed technical scope, approach, and budget of Armenian nuclear power plant in Yerevan, Armenia for US-AID and the World Bank as part of loan request verification. Evaluated impact of existing and proposed Federal regulations on radioactive and hazardous waste disposal facility being built for U.S. DOE in Hanford, Washington. Managed cost-benefit evaluation of decontamination and decommissioning (D&D) options for U.S. Army disposal of shut down nuclear power plants. Developed cost and performance guidelines for Quality Assurance (QA) and In-Service Inspection (ISI) and chemical decontamination program and procedures at Lucent Technologies.
- 1983 – 1992: *Duquesne Light Company, Beaver Valley Power Station*, Served as Site Maintenance Support Coordinator for dual unit commercial nuclear power plant. Responsible for Supervised maintenance engineers and technicians supporting the Site Maintenance Department at a 2-unit nuclear power plant. Served as Maintenance Dept. representing to on-site safety review committee. Responsible for review and analysis of proposed plant activities to verify compliance with NRC license requirements and safety regulations. Lead investigator for accident and equipment performance failures. Investigated accidents and occurrences for safety and root cause of failure. Performed off-site assessments of maintenance and repair parts manufacturing facilities for capabilities and compliance with NRC and ANI-QA requirements.
- 1978 – 1983: *Wheeling-Pittsburgh Steel Corporation*, Served as Corporate Mechanical Engineer responsible for environmental compliance audits, installation of major plant upgrades, and the design and implementation of new environmental remediation programs for rolling mills, continuous casting facilities, and foundries. Member of engineering team charged with upgrading the company's 80" hot strip mill. Worked with plant performance improvement team as Pollution Control Engineer. Responsible for the design, development, and installation of pollution abatement and performance enhancement projects at various steel manufacturing facilities and processing plants. In charge of the design and installation of various air, water, and soil pollution control projects at coke and steel processing plants.
- 1974 – 1978. *Blaw-Knox Foundry and Mill Machinery Corporation*, Project Engineer for modernization and expansion of large capacity iron and steel foundry. Responsible for design and installation of foundry mold manufacturing system and pneumatic sand transport system. Supervised maintenance and repair crews in large capacity machine shop.

Paul D. Swetland
Senior Executive Consultant
ATL International, Inc.

- 1998 – Present; *Senior Executive Consultant*. Conducted Component Design Basis Audit and NRC inspection preparation and follow-up at Kewaunee Power Station (January-February 2007). Independently assessed Davis Besse corrective action program implementation (August 2006). Performed comprehensive root cause analysis for the Davis-Besse corrective action program and implemented corrective action program restart improvement plan for the Davis-Besse NRC Inspection Manual Chapter (IMC) 0350 recovery effort (September 2002 – June 2003). Generated NRC operator license exams for Duke Power and Florida Power and Light Company plants. Assessed operator license candidates at St Lucie, McGuire and Catawba. Conducted audits of the fire protection program at Prairie Island.
- 1980 – 1997; US NRC, *Branch Chief*; coordinated NRC inspection findings, allegations, and performance assessments for the Limerick, Peach Bottom, and Susquehanna nuclear generating facilities. Conducted corrective action program effectiveness inspections at Limerick. As Senior Resident Inspector for Millstone, Haddam Neck, and Maine Yankee, planned, coordinated and conducted safety inspections to verify maintenance of public health and safety and compliance with NRC regulations and directed the site inspection staff. Participated in integrated and readiness assessment team inspections at Haddam Neck, Indian Point and Millstone. As Projects Section Chief, managed the NRC inspection, performance assessment, enforcement, and events response programs for the Salem/Hope Creek, Susquehanna and Indian Point nuclear generating facilities. Supervised field office personnel, including resident inspectors and clerical personnel. Led integrated performance assessment (DET precursor) and augmented incident team inspections.
- 1979 – 1980; *Maritime Program Administrator, Bath Iron Works*. Administered a \$1.5 million government research and development contract for the commercial shipbuilding industry.
- 1973 – 1979; *US Navy*, As Senior Instructor, Submarine Officer's Basic School; coordinated the curriculum development and instruction of a 12-week course in all aspects of submarine design, safety and operations. Supervised six instructors and up to 120 students. As Sonar Instructor, Naval Submarine School; developed and taught submarine sonar technology courses for naval officers. As Weapons Department Head on SSN 680; managed all aspects of submarine weapons and sensor system operations and maintenance. Responsible for the training, development and administration of a staff of 25 degreed engineers, skilled technicians and laborers. Designated best Weapons Department in the Squadron. As Engineering Division Officer on SSBN 640; directed the operation, maintenance and overhaul of various naval nuclear propulsion and support systems. Supervised 20 nuclear-qualified technicians, and managed the ship's radiological protection and chemistry programs.

David W. Barker
Root Cause Supervisor
Cooper Nuclear Station

- 2005 - present; *Cooper Nuclear Station*; Root Cause Supervisor. Oversight and maintenance of the site root cause investigation process. Supervise core team of dedicated root cause investigators which lead all significant site investigations. Define investigator qualification and proficiency standards. Establish and implement effectiveness standards/process and monitor results for inclusion in proficiency training.
- 2002-2005; *Harris Nuclear Plant*; Corrective Action Program Owner. Oversight and maintenance of Corrective Action Program and Root Cause Investigation processes, monitoring program status against performance indicators, developing/implementing initiatives for improvements, and chair site daily meetings for review and classification of new Condition Reports. Chair for site Root Cause Review Team which performed peer and management reviews of root cause investigations. Site lead for critical root cause investigations.
- 1995-2002; *Harris Nuclear Plant*; Engineering CAP Lead Section Evaluator. Engineering representation in classification and acceptance of Condition Reports, site lead for root cause investigation teams, performance of trend analysis of Engineering Condition Reports to detect and document adverse trends. Self-assessment and benchmarking coordination for Engineering section. Qualified system and design engineer.
- 1991-1995; *Harris Nuclear Plant*; Regulatory Affairs CAP Specialist. Oversight and maintenance of site CAP process, root cause investigation process, and action item tracking process. Led root cause investigation teams. Performed site-wide Condition Report trend analysis.
- 1983-1991; *Harris Nuclear Plant*; QA/QC Senior Specialist. Led performance-based assessments in the areas of operations and maintenance.
- 1975-1983; *US Navy Submarine Service*; Completed all training and qualifications as a nuclear plant operator at the S5G prototype. Served aboard the USS Whale (SSN 638) qualifying on all (S5W power plant) watch stations up to, and including, supervisory positions in the propulsion plant engine room.

Kim Kieler
Quality Audits Supervisor
South Texas Project

- 2006 - present; *South Texas Project*; Quality Audits Supervisor, Responsible for the scheduling and performance of all station audits. Supervise lead auditors that lead all station audits. Maintain oversight of Master Scope Lists for continuous in field monitoring in support of audit objectives. Supervisory responsibilities include condition report screening and significance determination including initial cause and event code assignment.
- 1989 – 2006: *South Texas Project*; (Multiple roles)
 - Qualified Lead Auditor in 2000, Responsible for oversight and leading numerous plant audits, team member and led NUPIC audits and surveys. All audits include departmental corrective action program evaluation.
 - CAP Supervisor 1995 Supervisory responsibilities include condition report screening and significance determination including initial cause and event code assignment.
 - Quality Inspector Level II 1989, multi-discipline (Mechanical , Electrical , I&C, Civil, Visual Weld VT-1,2,3, Receipt Inspection and Material Testing) Perform in-field Quality Inspection activities during refueling outages.
- 1982 – 1989: *South Texas Project*; Ebasco Constructors Inc., Quality Inspector Level II Civil discipline. Responsible for inspection of various civil activities during the construction phase of the South Texas Nuclear Project.
- 1978 – 1982: *South Texas Project*; Brown & Root Inc., Quality Inspector Level II Civil discipline. Responsible for inspection of various civil activities during the construction phase of the South Texas Nuclear Project.

Wayne Rheume
Manager – Corrective Actions and Assessments
James A. FitzPatrick Nuclear Power Plant

- June 2006 to present (except Dec. 2006); *James A. FitzPatrick (JAF) Nuclear Power Plant*; Acting Director, Nuclear Safety Assurance. Oversight of: Corrective Action and Assessments, Regulatory Compliance, Emergency Planning, Quality Assurance, Employee Concerns.
- 2004 – Present; *JAF Nuclear Power Plant*; Manager, Corrective Action and Assessments. Responsible for Corrective Action, Root Cause Analysis, Assessments, Trending, and Operating Experience Programs, leading noteworthy improvements in indicators such as Corrective Action Backlog, Average Age of Condition Reports, Evaluation Timeliness and Quality, and Learning Organization Corrective Actions. Periodically Acting Director, Nuclear Safety Assurance
- 2001 – 2004; *JAF Nuclear Power Plant*; Manager, Human Performance (HU). Led JAF from a poorly rated HU record to industry-recognized top-decile performance
 - Successfully led JAF in a 400+% error rate improvement, decreasing error rates by 60+% in less than one year and 98+% within two years, and achieving fleet leadership.
 - Led the resolution of long-standing INPO areas for improvement in ten months and reversal of INPO Significant / Noteworthy event trends from worst to best quartile.
 - Selected to participate in various industry advisory committees and conference presentations.
 - Developed and implemented industry-best HU Training Center.
- 1998 – 2000; *JAF Nuclear Power Plant*; Engineering Support Services Supervisor. Successfully led the Engineering Support Department in eradicating an approximate ten-year backlog of plant drawing update filming. Supervised: Procedure/Process Improvement, Engineering Training Program, Design/Drafting, Engineering Finance and Metrics
- 1980 – 1998 (and in 2000); Various positions and responsibility levels in Quality Assurance, In Service Inspection, and Non-Destructive Examinations.
 - Supervised QC services related to 90+ plant modifications during a plant outage, as well as routine maintenance and operations activities.
 - Corporate NDE Administrator/Level III for New York Power Authority (NYPA). Responsible for training/certification and day to day operations of NYPA and contract personnel related to: NDE, welding, mechanical and visual inspection for plant maintenance, In-Service Inspection, In-Vessel Reactor inspections, nuclear fuels receipt, modification and construction activities at two nuclear, various Non-Nuclear, and the corporate facilities.
 - Contract and bid proposal review and approval (up to 3+ million) recommendation to Sr. VP regarding safety related contracts and services.
 - Receipt Inspection activities and vendor surveillance visits to over 30 vendor facilities.
 - Oversight of Material Dedication Program.
 - Corrective Action Coordinator - Supervise the activities of three personnel for the trending, tracking, and statistical evaluation of the IP3 Nuclear Power Plant Corrective Action Program prior to organization of a formal Operations Review Group.
 - Conceptualized and developed Integrated Verification Program.
 - Shoreham Nuclear Metrology Laboratory - oversee test equipment calibration.

Wayne Rheume

- 1989-2001; Various Training positions and responsibilities.
 - JAF INPO Training Program Recovery Team (during program probation) Assessment Lead. Developed a Master Effectiveness Assessment Plan and led teams of internal and external technical specialists to assess correctness, completeness, and effectiveness of corrective actions taken by the Training Recovery Team.
 - Successfully led Engineering Training Program weakness correction effort
 - Corporate Nuclear QA Training Coordinator - Administrative responsibility for the development and implementation of a QA Training Program for two nuclear power plants and the corporate facility.
 - INPO Human Performance Continuing Training Advisory Committee Member
 - Subject Matter Expert several areas – qualified training instructor
 - Developed and/or implemented training for all NYPA nuclear and non-nuclear sites including: Human Performance Advanced Fundamentals, In-Service Inspection, ASME Code Section XI, All NDE Methods Levels I, II, and III, Self Assessments, Interviewing Skills, Observation Skills, Performance Based Auditing, Lead Auditor training for various plants throughout the Northeast, Engineering Support Personnel Training.
 - Developed Integrated Training Program and conceptualization of Qualification Card Program

- Additional Operation and Performance Improvement duties, including root, apparent, common cause analysis of plant events / discrepancies / trends; Tracking and trending of site level performance metrics; Corporate due diligence evaluations; and Benchmarking of other utilities and industries

- CERTIFICATIONS (Current and previous). ANSI N2.23 Lead Auditor; SNT-TC-IA Level III in four disciplines: MT, PT, UT, VT; Level IIA ET, RT Level I, ASNT Cert #MM-1306; Level III ASME Code Section XI Visual (EPRI) / Mechanical / Welding.