



FirstEnergy Nuclear Operating Company

"Designated Original"
per
Roger Doornbos

Perry Nuclear Power Station
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October 31, 2006
PY-CEI/OIE-0678L

Mr. James L. Caldwell
Regional Administrator, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Perry Nuclear Power Plant (PNPP)
Docket No. 50-440
License No. NPF-58

Subject: Third Quarter 2006 - Update of Confirmatory Action Letter (CAL) Commitments

Dear Mr. Caldwell,

In your letter dated September 28, 2005, which transmitted the CAL commitments, you requested FirstEnergy Nuclear Operating Company (FENOC) to provide quarterly updates for any completed commitments. This letter provides the requested update for the third quarter of 2006. At the July 11, 2006 public meeting, FENOC indicated that there was one remaining CAL commitment that would be completed in fourth quarter, 2006. That remaining commitment is to perform a self-assessment to evaluate overall health of the Corrective Action Program. Although the self-assessment has been performed, senior management has not reviewed and approved the final closure of the commitment. The senior management review is scheduled to occur in early fourth quarter, 2006. Therefore, FENOC has one remaining CAL commitment that will be completed in fourth quarter, 2006. The attached table depicts the completed commitments for the Corrective Action Program Implementation Improvement activities.

There are no additional commitments contained in this letter. If you have any have questions or require additional information, please contact Mr. Jeffrey Lausberg, Manager, Regulatory Compliance at (440) 280-5940.

Very truly yours,

J. William Pearce for LWP

Attachment

cc: NRC Document Control Desk
NRC Project Manager
NRC Resident Inspector
E. Duncan, NRC RIII

IE35
Rec'd on
5/24/07

PNPP Commitments

Attachment
PY-CEI/OIE-0678L

ITEMS	DESCRIPTION	QUARTER DUE	STATUS
1.0	IP 95002 Inspection Follow-up Issues		
1.a	To date, one hundred eight (108) of the one hundred nineteen (119) procedures have been updated and issued. The remaining maintenance procedures have been updated and are currently going through the owner's review and acceptance review process.	Third 2005	Complete
1.b	CA 05-03655-01 is to revise Nuclear Quality Assurance Instruction NQI-1001, "QC Inspection Program Control," to specify a method by which classification can be established for additional inspection attention items that have experienced repeat failures. This method will include consideration of failure analysis, the risk-significance of the item, and the probability of failure occurrence in determining the extent of inspection activity.	Third 2005	Complete
1.c	CA 05-03655-03 is to revise Generic Mechanical Instructions (GMI)-0039, "Disassembly/Re-assembly of Divisions I and II Emergency Service Water Pumps," and GMI-040, "Disassembly/Re-assembly of Division III Emergency Service Water Pump," to include QC inspection points for work activities associated with pump shaft couplings, as specified by QC.	Third 2005	Complete
2.0	Corrective Action Program Implementation Improvement		
2.a	Develop expectations necessary for successful implementation of the corrective action program (CAP). Train the site to the expectations and accountability methods that will be used to improve implementation of the CAP.	Fourth 2005	Complete
2.b	Implement management controls to improve line ownership and accountability at the individual level for successful implementation of the CAP.	Third 2005	Complete
2.c	Establish a management review process that routinely monitors the site's and section level CAP performance. Take action to improve performance when expectations are not met and hold the organization accountable for overall CAP effectiveness.	Third 2005	Complete
2.d	Perform a self-assessment that evaluates the overall health of the CAP, including an aggregate assessment of key performance indicator trends. Assess whether substantial progress has been made in CAP performance.	Fourth 2006	In Review
3.0	Excellence in Human Performance		
3.a	Roles and responsibilities of the Site Leadership Team in implementing the human performance program will be defined and communicated.	Fourth 2005	Complete
3.b	Approximately monthly Site Training Advisory Committee and department / section Training Review Committee meetings have been held and will continue to be conducted with a strong focus on human performance through fourth quarter 2005.	Fourth 2005	Complete
3.c	The purpose and key activities of the Human Performance Program will be communicated to Perry Nuclear Power Plant (PNPP) personnel.	Fourth 2005	Complete
3.d	Group-specific needs analyses will be performed by training committees to determine the scope and content of initial and continuing training needs on human performance fundamentals and error prevention tools and training will be provided.	First 2006	Complete
4.0	Emergency Preparedness		
4.a	FENOC is expanding the population of qualified EP responders by approximately 125 persons to increase the depth of the emergency response organization.	Fourth 2005	Complete
4.b	Additional drills will be conducted to demonstrate appropriate Emergency Response Organization response times.	Fourth 2005	Complete