FENOC
FirstEnergy Nuclear Operating Company

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Docket Number 50-346
License Number NPF-3
Serial Number 1-1495

June 12, 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 Engineering Program Effectiveness Independent Assessment Plan for the Davis-Besse Nuclear Power Station - 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) Engineering Program effectiveness. 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 ninety (90) days prior to the assessment.

In accordance with the Confirmatory Order, the FirstEnergy Nuclear Operating Company (FENOC) is submitting the Engineering Program Effectiveness Independent Assessment Plan, including the identification and qualifications of the assessors. The onsite portion of the assessment is scheduled to commence on September 10, 2007, with this portion of the assessment lasting approximately two weeks. A final debrief with the DBNPS staff, marking the end of the assessment, will be conducted by October 5, 2007. The final assessment report and action plans, if required, will be submitted to the NRC within 45 days following the final debrief.

If you have any questions or require further information, please contact Mr. Raymond A. Hruby, Jr., Manager - Regulatory Compliance, at (419) 321-8000.

Sincerely yours,

LJS

Attachment 1 - Commitment List
Enclosure 1 - Davis-Besse Nuclear Power Station Engineering Program Effectiveness Independent Assessment Plan – Year 2007
Enclosure 2 - Davis-Besse Nuclear Power Station Engineering Program Effectiveness Independent Assessment – Year 2007 Assessors and Qualifications

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

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 Manager - Regulatory Compliance (419-321-8000) at the DBNPS of any questions regarding this document or associated regulatory commitments.

COMMITMENTS	DUE DATE
None.	N/A

Docket Number 50-346
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Enclosure 1

Davis-Besse Nuclear Power Station
Engineering Program Effectiveness Independent Assessment Plan – Year 2007

(5 pages to follow)

FENOC Davis-Besse Engineering Assessment Plan - 2007

NUMBER:
COIA-ENG-2007

ASSESSMENT AREAS:

Engineering program effectiveness of modifications, calculations, system engineering, and corrective action program utilization.

PURPOSE:

The purpose is to provide an independent and comprehensive assessment of the Engineering program effectiveness 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 No. 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. The assessment will also be used to assess the rigor, criticality, and overall quality of available Davis-Besse internal self-assessment activities in the Engineering program areas listed above. The final assessment report will provide an overall concluding statement on the Engineering program effectiveness as rated utilizing the assessment categories of DBBP-VP-0009.

SCOPE:

The Independent Assessment Team will assess the following Engineering program areas:

1. Plant Modification process
2. Calculation process
3. System Engineering Programs and Practices
4. Implementation of the Corrective Action Program (CAP) by Engineering
5. Effectiveness of self-assessments
6. Corrective actions taken in response to the Areas in Need of Attention (ANAs) identified during the 2006 Independent Assessment of the Davis-Besse Engineering Program Effectiveness

The Assessment Team will assess conduct of the following activities:

1. Plant Modification Process

The team will perform a review of activities to assess the effectiveness of the plant modification process:

a. Selection and prioritization of potential modifications, including assessment of delayed modifications on plant and operating personnel
b. Owner acceptance sub-process (review of contracted work)
c. Quality of modification packages since the 2006 assessment (Permanent and Temporary Modifications)
d. Closeout of modification packages and supporting document updates

e. Effectiveness of modifications
f. Interaction and support from parallel processes
g. Workload management

2. Calculation Process

The team will assess the following attributes of the plant calculation process:

a. Workload management, including appropriateness of work priorities
b. Acceptance criteria and owner acceptance sub-process (review of contracted work)
c. Margin management and allocation
d. Linkages and consistency with other calculations
e. Preservation of design bases
f. Documentation/traceability/attribution
g. Calculation health and improvement program
h. Interaction and support from parallel processes
i. Systems descriptions design information
j. Engineering rigor and attention to detail

3. System Engineering Programs and Practices

The team will investigate the following items:

a. System Engineering alignment and plant support
b. System Health evaluation and reporting
c. Process for prioritizing, communicating, and resolving health deficiencies and program deficiencies
d. Equipment Reliability Improvement Program as reflected in the FirstEnergy Nuclear Operating Company (FENOC) Excellence Plans
e. Maintenance Rule system monitoring and trending
f. Experience and expertise, including use of operating experience
g. Margin awareness and margin allocation
h. Interaction and support from parallel processes
i. Access to knowledge of Engineering information in calculations
j. Workload management

4. Implementation of the Corrective Action Process by Engineering

The Assessment Team will assess the following:

a. Condition Report ownership and appropriate initiator involvement
b. Quality of root and apparent causes produced by Engineering and associated management behavior and guidance
c. The Assessment Team will review selected Condition Reports related to Engineering Section performance initiated since the 2006 Independent

Assessment of Engineering Performance and independently assess the corrective actions taken

5. Effectiveness of Davis-Besse Assessment Activities

The Assessment Team will evaluate the effectiveness of the Davis-Besse Nuclear Power Station's assessment activities associated with the implementation of Engineering programs as follows:

a. Planning of assessments over the short and long term for ongoing assessment of Engineering performance
b. Review the results of the Davis-Besse Quarterly Quality Assessments that evaluated Engineering. Determine if the assessments were comprehensive and if effective actions were taken to correct problems or weaknesses identified.
c. Evaluate the effectiveness of self-assessment capability by reviewing corrective actions associated with self-assessment reports, audits (including audits of the offsite safety committee activities), and evaluations conducted of Engineering program implementation.
d. Determine if the Engineering staff is aggressive in correcting self-assessment and assessment findings, and determine whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results.
e. Determine the receptivity and responsiveness of management and staff to issues raised in self-assessments and assessments.

6. Corrective actions taken in response to the Areas in Need of Attention (ANAs) identified during the 2006 Independent Assessment of the Davis-Besse Engineering Program Effectiveness

The Assessment Team will evaluate the responses to the seven (7) Areas in Need of Attention (ANAs) identified during the 2006 Independent Assessment:

- 1 ANA Inattention to detail in calculations
- 2 ANA Implementation of requirements from calculations
- 3 ANA Equipment Reliability Program
- 4 ANA Red plant health systems
- 5 ANA Employee Concerns Program (ECP) Revision Reviews
- 6 ANA Follow-ups to assessments and last year's COIA-ENG- 2005
- 7 ANA Management of engineering workload

INDEPENDENT ASSESSMENT TEAM:

- John Garrity, Marathon Consulting Group, Team Leader
- Paul Borer, Marathon Consulting Group
- Harold Baumberger, Marathon Consulting Group

- Rod Filipek, I&C Design Supervisor, St. Lucie Station, Florida Power & Light Co.
- Joseph Pechacek, Manager, Engineering Programs, FitzPatrick Nuclear Station, Entergy Northeast
- Mark Flaherty, Manager, Engineering Services, Calvert Cliffs Nuclear Power Plant, Constellation Energy

Biographies attached.

SCHEDULE:

- July 10, 2007: Send selected documentation to team members to begin off-site preparations.
- July 16, 2007 to September 7, 2007: Offsite (in office) review in preparation for onsite assessment.
- September 9, 2007: Assessment team will assemble at the plant for final assessment preparations.
- September 10, 2007 to September 21, 2007: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- October 5, 2007: Draft team assessment report and final debrief (marks the completion of the assessment) will be provided to Davis-Besse.
- October 12, 2007: Final team assessment report provided to Davis-Besse.
- November 19, 2007: Final Davis-Besse assessment report and action plans (if required by findings) will be submitted to the NRC within 45 days of the completion of the on-site assessment.

ASSESSMENT METHODS:

The Independent Assessment Team will use DBBP-VP-0009 "Management Plan for Confirmatory Order Independent Assessments"

The assessment methodology may include, but is not limited to, 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 will apply to the assessment of Davis-Besse Engineering program implementation:

- Modification and Calculations reflect in-depth reviews of problems and resolutions that support a high level of nuclear safety.
- Engineers demonstrate knowledge and understanding of the design basis, including maintenance of design basis documentation.

- System engineers demonstrate intolerance for failures of critical equipment.
- Engineers maintain clear ownership of corrective actions from initiation through resolution.
- A rigorous approach to problem solving and application of engineering procedures and methods is used.

The Assessment Team will review the referenced procedure/documents during the preparation period prior to site arrival.

The Assessment Team will identify in its final report, as applicable, areas of strength, areas in need of attention, and areas for improvement as defined in Davis Besse Business Practice DBBP-VP-0009. The Team will provide an overall concluding statement on the Engineering program effectiveness as rated utilizing the assessment categories of DBBP-VP-0009.

REFERENCES:

- Confirmatory Order dated March 8, 2004
- DBBP-VP-0009 "Management Plan for Confirmatory Order Independent Assessments"
- NOP-CC-2003, Engineering Changes
- NOP-CC-3002, Calculations
- NOP-LP-2001, Condition Report Program
- Action items from NRC inspection reports issued since September 22, 2006, that are applicable to the areas assessed (i.e., condition reports, corrective actions, responses to findings and non-cited violations)
- Applicable self-assessments performed since September 22, 2006
- QA Quarterly Assessments/Reports for past three quarters
- CNRB meeting minutes from last three CNRB intervals.
- Applicable Section or area Performance Indicators

ASSESSMENT PLAN APPROVALS:

Prepared by: John H Garrity Date: 6/5/07
John H. Garrity, Assessment Team Lead

Approved by: Lori J. Strauss Date: 6/8/07
Lori J. Strauss, Project Manager

Approved by: Jeannie M. Rinckel Date: 6/8/07
Jeannie M. Rinckel, Executive Sponsor

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Enclosure 2

Davis-Besse Nuclear Power Station
Engineering Program Effectiveness Independent Assessment – Year 2007

Assessors and Qualifications

(8 pages to follow)

John H. Garrity
President and Chief Executive Officer
Marathon Consulting Group

- 1994-present: *Marathon Consulting Group*; President and CEO –
  - Responsible for Marathon client service operations, and selected personal consulting engagements. Engaged in expert consulting in the area of process performance monitoring and improvement, management mentoring, process centered team formation and compensation, configuration management, business plan and corporate strategy development, process improvement training, and project management training. Also conducted root cause and collective significance analyses of client situations, and participated or lead high impact teams to resolve problems.
  - Team Leader, Davis-Besse Independent Assessment of Engineering Programs Effectiveness 2004, 2005, and 2006
- 1993-1994: *New York Power Authority*; Resident Manager - Placed in charge after unit was shut down under NRC confirmatory action letter and on problem plant list. Responsible for developing and executing plan to resolve problems in context of intense political pressure and company senior management turnover. Numerous escalated enforcement actions from actions of earlier periods mitigated by effective, aggressive management investigations and corrective actions.
- 1992: *TVA Bellefonte*; Site Vice President - Responsible for all ongoing activities necessary to reactivate the project from deferred status.
- 1990-1992: *TVA, Watts Bar*; Site Vice President - Responsible for all activities necessary to progress completion of the Watt's Bar units, including engineering, construction, startup, operational readiness, and commissioning. Formulated management objectives for restart of construction following stand down and significant regulatory involvement. Reengineering of design engineering and construction processes, restart of construction, outsourcing construction labor, engineering, and management. Instituted management performance accountability through site wide self-monitoring program, based on principles of TQM. Significant improvement of site nuclear performance, left site positioned for successful completion. Credibility with NRC restored. Significant process performance improvement results in engineering design, engineering analysis, construction engineering, construction, and corrective action.
- 1990: *Maine Yankee Atomic Power Co*; Assistant to President - Special projects assignment, including work on low level waste disposal options available to company and state.
- 1989-1990: *Maine Yankee Atomic Power Co*; Vice President Engineering and Licensing - Responsible for nuclear engineering, plant engineering, licensing, and operations support.
- 1988-1989: *Maine Yankee Atomic Power Co*; Assistant Vice President Engineering and Quality Programs - Responsible for quality assurance, nuclear engineering, licensing and plant engineering.
- 1984-1988: *Maine Yankee Atomic Power Co*; Plant Manager/Senior Site Manager - Responsible for site operations.

Paul J. Borer
Senior Vice President
Marathon Consulting Group

- 2002-present: *Marathon Consulting Group*
  - Performed safety culture and engineering effectiveness assessments, assessment of a foreign nuclear station overall processes and performance, provided executive oversight of a multi-year program to introduce US system engineering process concepts to a foreign nuclear power station fleet, USNRC Inspection Procedure 95-003 (Supplemental Inspection for Repetitive Degraded Cornerstones) process readiness reviews
  - Team Member - Davis-Besse Independent Assessment of Engineering Programs Effectiveness in 2004 and 2005.
- 1986-2002: *Institute of Nuclear Power Operations (INPO)*-Held the following positions:
  - Senior Representative for Assistance - Management consulting role. Responsible for formulating performance improvement plans for several nuclear stations. Provided direct feedback to senior station management on performance issues. Prioritized deployment of INPO assistance resources.
  - Division Director, Plant Operations Division - a technical INPO division responsible for evaluation of Operations, Chemistry, and Radiation Protection areas. Involved in setting standards for evaluations, responsible for the evaluator training program, and assisting the industry in attaining standards of excellence.
  - Detroit Edison Vice President - Nuclear Generation (On - loan from INPO 1997-1998) Responsible for all aspects of Operation, Maintenance, and Engineering of a large scale BWR. Led a plant staff of approximately 500.
  - Vice President, Nuclear Engineering - New York Power Authority (On - loan from INPO 1993-1994). Responsible for Design Engineering at two nuclear generating stations. Developed and implemented a plan to deploy corporate design engineering resources to the stations in order to be more responsive to station needs.
  - Department Manager - Managed four INPO departments (Emergency Preparedness, Operating Experience Applications, Technical Support, and Operations) - Responsible for the evaluation of their respective areas of plant performance and various assistance programs. Also functioned as a Team Manager and lead teams of 15-20 INPO and industry professionals during performance-based nuclear plant and corporate evaluations.
  - Held a Senior Reactor Operator's License - Boiling Water Reactor and Licensed Professional Engineer - Mechanical.
- 1985: *Engineering, Planning, and Management, Inc.*; Project Manager - Responsible for the overall conduct of work, sales, budget, schedule, client relationship, and quality of products for EPM clients in the Southeastern U.S.
- 1983-1984: *Smith Barney, Harris Upham, and Company*; Account Executive - Responsible for retail securities sales, client development, securities research, financial planning advice.
- 1976-1983: *Cooper Nuclear Station*; Served in various management positions, all reporting to the site manager. (Operations Manager, Engineering Manager, Chemistry and Radiation Protection Manager)
- 1970-1976: *U. S. Navy;* Completed the Naval Nuclear Power Training Program and served aboard a nuclear submarine.

Harold E. "Rusty" Baumberger
Vice President and Director, Performance Assessment
Marathon Consulting Group

- 1996-present: *Marathon Consulting Group*; Responsibilities include the following:
  - Vice President and Director, Performance Assessment - Responsible for business areas of independent assessment, INPO evaluation and NRC inspection support, Design Basis assessments, Corrective Action Program assessments, and Maintenance Rule implementation. Also serve as Marathon's Quality Assurance Manager.
  - Team Member, Palo Verde ImPACT Review Team, root cause evaluation and corrective action program area, responsible for review of programs and practices in preparation for NRC 95003 Inspection.
  - Consultant, responsible for assessment of Perry Corrective Action Program for effectiveness of past actions, current status, performance monitoring and goals, and ongoing 95003 recovery plans.
  - Team Member - Davis-Besse Independent Assessment of Engineering Programs Effectiveness in 2004, 2005, and 2006.
  - Project Lead of the Master Equipment List (MEL) Update Project at Millstone - Managed the validation and update of the MEL database.
  - Executive Lead, Transition for the Vermont Yankee Nuclear Power Corporation - Managed the implementation of the sale agreement and transition of the Vermont Yankee station to new ownership. Reported directly to the President & CEO.
  - Quality Assurance Manager - Developed and implemented Quality Assurance Program, obtained NUPIC certification, trained and certified lead auditors. Provided interface with client QA Managers.
  - Configuration Management Supervisor at Cooper Nuclear Station - Worked in environment of high regulatory scrutiny to improve Engineering performance and develop recovery strategies. Responsible for maintaining Design Basis and resolving Design Basis and Configuration Control issues. Managed Modification Process, Design Criteria Program, Equipment Classification Program, Equipment Data File, and Drawing Control Program.
  - Served as a Safety System Functional Evaluation team member in the area of Operations at Beaver Valley - Reviewed the 4kV Electrical Distribution and Emergency Diesel Generator systems for Unit 2.
  - Provided expert consulting related to INPO-related issues at River Bend - Participated in major assessment covering the new INPO Performance Objectives, existing INPO findings, and items from the Long Term Performance Improvement Program.
  - Participated in a component-level design basis review of non safety-related systems and outage work at Dresden - Documented review of over 7000 components against Design Basis, FSAR requirements, original system and component specifications, and vendor-supplied data.
  -

Harold E. "Rusty" Baumberger (Continued)

- Performed assessment of Design Basis programs at Vermont Yankee including Design Basis document program development.
- Participated on corporate Engineering Independent Safety Assessment Response Team at Maine Yankee.

- 1990-1996: *Independent Consultant*; Provided services to nuclear utilities and Department of Energy (DOE) contractors in management, safety review, quality assurance and performance areas. Performed audits and independent assessments of overall performance, outage management, maintenance, and configuration management programs.
- 1988-1990: *Liberty Consulting Group*; Senior Consultant - Led evaluations of management capability at nuclear power plants in all areas of facility operation. Conducted assessment of plant performance against INPO standards.
- 1980-1988: *Institute of Nuclear Power Operations* (INPO); Evaluator/Senior Evaluator - Performed evaluations of more than 50 commercial nuclear power stations in areas of maintenance, Engineering Support, and Organization and Administration. Participated in accreditation reviews of utility training programs.
- 1977-1980: *Nuclear Power Consultants*; Consultant – Provided services to nuclear utilities and government agencies conducting reviews and audits in areas of operations, maintenance, engineering, quality assurance, nuclear fuel fabrication and procurement, and licensing. Project manager for the update of Fort St. Vrain Final Safety Analysis Report. Participated in the review of Ontario Hydro's heavy water production costs and uranium fuel requirements for the Providence of Ontario.
- 1967-1977: *U. S. Naval Submarine Service*; Naval Nuclear Propulsion Officer – Responsible for supervision, operation and maintenance of nuclear propulsion plant and ship's auxiliary systems. Certified Navy Nuclear Propulsion Engineer Officer. Participated in refueling, pre-operational testing, and startup of two reactors following extended outages, including one after a change of NSSS.

Rod Filipek
Supervisor, Instrument and Control (I&C)/Digital Design Engineering
St. Lucie Nuclear Power Plant, Florida Power & Light

- January 2006 - Present: *St. Lucie Nuclear Power Plant, Florida Power and Light;* I&C and Digital Design Engineering Supervisor - Supervise the production of I&C design Modifications and support the recently-installed Distributive Control System (DCS). Acted as Shift Design Engineering Manager during the last two Unit outages.

- January 2004 - December 2005: *St. Lucie Nuclear Power Plant, Florida Power and Light;* Procurement Engineering and Configuration Management Supervisor -Supervised Procurement Engineering and Configuration Management activities for the station. Team Lead for Configuration Management Self-Assessment. Mid-cycle INPO Plant Evaluation Team Member for St. Lucie.

- October 1990 - December 2003: *St. Lucie Nuclear Power Plant, Florida Power and Light;* I&C Design Engineering Supervisor - Supervised production of I&C design modifications for the station. For periods of time was also the Electrical Design Engineering Supervisor.

- October 1989 - October 1990: *St. Lucie Nuclear Power Plant, Florida Power and Light;* I&C Design Engineer - Prepared I&C design modifications for the station.

- December 1985 - October 1989: *Fermi II Nuclear Power Plant, Detroit Edison Company;* I&C Engineer - Head of I&C Plant Maintenance and Technical Department. System Engineering Supervisor - Supervised I&C and Electrical System Engineering groups. Member of the Detroit Edison Company Nuclear Speaker's Bureau.

- April 1979 - December 1985: *Fermi II Nuclear Power Plant, General Electric Company;* Co-Startup Test Engineer - Supported pre-operation and startup testing. Obtained General Electric (GE) Boiling Water Reactor Senior Reactor Operator certification and Professional Engineering License.

- January 1978 - April 1979: *General Electric Company;* Field Engineering - Provided training and testing support at the GE Power Generation Control Complex and training facilities in San Jose, California.

- July 1977 - January 1978: *General Electric Company;* Field Engineering - Training and field training assignments.

Joseph A. Pechacek
Manager – Program and Component Engineering
James A. FitzPatrick Nuclear Power Plant, Entergy Nuclear Operations

- 1995-present: *Entergy Nuclear Operations, James A. FitzPatrick Nuclear Power Plant;*

  - Manager-Program and Component Engineering - Responsible for leadership of Program and Component Engineering Department consisting of twenty engineers and technicians. Department responsibilities include performance monitoring and trending of station components; administration and maintenance of the station's preventive maintenance program; conduct of equipment failure evaluations; and administration and maintenance of engineering programs, e.g. fire protection, Motor-Operated Valve (MOV)/Air-Operated Valve (AOV), Flow Accelerated Corrosion (FAC), Appendix J. Direct reports consist of three engineering supervisors in the areas of Code Programs, Component Engineering and Procurement Engineering.

  - Manager-Design Engineering - Provided leadership of Design Engineering Department consisting of twenty-five engineers, technicians, drafters and clerical staff. Department responsibilities included development of both commercial and nuclear design changes, maintenance of engineering configuration, and maintenance of plant design basis. Direct reports consisted of five engineering supervisors in the areas of Mechanical, Civil / Structural, Electrical, Instrumentation and Controls, and Engineering Configuration.

  - Manager – Engineering Support - Provided leadership of Engineering Support Department consisting of fifteen engineers, technicians and drafters. Department responsibilities included Procurement Engineering, Modification Design, Vendor Manual and Plant Equipment Database maintenance, and design drafting. Direct reports consisted of three supervisors.

  - Fire Protection and Safety Coordinator - Provide leadership for the implementation and maintenance of the station Fire Protection and Industrial Safety Programs in accordance with NRC, NEIL/NSO, Factory Mutual (FM), New York State Uniform Fire Code, and NYOSH/OSHA guidelines and regulations. Responsibilities included supervision of five Fire Protection and Industrial Safety Technicians and oversight of day-to-day fire protection and industrial safety activities.

  - Senior Fire Protection Engineer - Maintained the station Fire Hazards Analysis (FHA); 10CFR50, Appendix R Safe Shutdown Analysis and Fire Protection Design Basis Document. Performed reviews and developed evaluations for NFPA code deviations and fire barrier deviations per NRC Generic Letter 86-10. Performed hydraulic calculations of suppression fire systems and assessed plant features using computer fire models. Prepared 50.59 Nuclear Safety Evaluations to support resolution of Final Safety Analysis Report (FSAR) deviations.

- 1994-1995: *IBEX Engineering Services;* Fire Protection Supervisor - Served as Fire Protection Supervisor at the James A. FitzPatrick Nuclear Power Plant. Supervised staff of four Fire Inspectors and approximately thirty fire watch personnel.

- 1992-1994: *Engineering, Planning, and Management Inc., (EPM)*; Fire Protection Engineer - Evaluated plant fire protection systems and features for compliance with NFPA codes, evaluated findings, and recommended corrective actions.

- 1989-1992: *Robson and Woese, Inc.,* Fire Protection Engineer - Designed fire suppression and detection systems for commercial and institutional projects which included preparation of specifications and drawings. Performed fire hazards analyses which included the use of compartment fire and heat transfer models.

Mark D. Flaherty
Manager, Engineering Services
Calvert Cliffs Nuclear Power Plant, Constellation Energy

- April 2006 – present: *Calvert Cliffs Nuclear Power Plant, Constellation Energy;* Manager, Engineering Services - Responsible for providing engineering services to site including system, design, program, and equipment reliability functions. Manage a staff of over 100 engineers, technicians, and supervisors

- February 2006 - April 2006: *Constellation Energy;* Vice President, Technical Services (Acting) - Responsible for providing oversight for corporate technical functions including Fuels, Corporate Engineering, Probabilistic Risk Assessment, and Licensing. Supervised managers of identified corporate functions; participated in senior leadership meetings and councils

- June 2004 - Feb 2006: *Constellation Energy;* Manager, Fleet Licensing - Responsible for: interfacing with Nuclear Regulatory Commission (NRC) management; creating and implementing standard Licensing processes and procedures; providing interface to INPO and NEI; serving on site Nuclear Safety Review Boards. Supervised three site Licensing Directors and staff, including two corporate personnel. Managed oversight of successful recovery of Nine Mile Point License Renewal Project - $3M effort. No NRC violations at any site greater than green during this time period, closed two existing white findings

- July 2001 - June 2004: *R.E. Ginna Nuclear Power Plant,* Rochester Gas and Electric Corporation (RG&E); Manager, Nuclear Safety and Licensing - Responsible for interfacing with NRC personnel including preparing License Amendment Requests (LARs) and responding to correspondence (e.g., Orders, Bulletins, etc.). Supervised staff of eight personnel (imaging, licensing, risk, and software engineers). Managed conversion of configuration management computer system from mainframe to local server based - $0.5M project.

- October 1998 - December 2001: *R.E. Ginna Nuclear Power Plant, RG&E;* Manager, Configuration Support Engineering - Implemented Design Basis Document (DBD) Program which provided electronic copies of design related information on employee computers - $3.5M project. Supervised staff of eight personnel (imaging, design, risk, and software engineers). Implemented new 10CFR50.59 and 10CFR50.65(a)(4) Programs. Shift Technical Advisor (STA), 2000. INPO Plant Evaluation Team Member for Point Beach, 2000. Participated as an International Atomic Energy Agency (IAEA) PRA expert to Krsko (Croatia) and Dukovany (Czech Republic) in 1991 and 1992, respectively.

- February 1997 - October 1998: *R.E. Ginna Nuclear Power Plant, RG&E;* Senior Licensing Engineer - Senior Reactor Operator (SRO) Certification. Developed and implemented risk models for Ginna Station using Equipment Out Of Service (EOOS) software.

- February 1989 - February 1997: *R.E. Ginna Nuclear Power Plant, RG&E;* Licensing Engineer - Developed and managed Improved Technical Specifications (ITS) Program - (Ginna Station was first and oldest Westinghouse plant to convert) and received Senior Nuclear Executive Award - $1.5M project. Developed probabilistic risk assessment (PRA) models and programs; managed program beginning 1995; $3M project. Responsible for multiple licensing tasks (research licensing basis, LARs)

- September 1986 - February 1989: *Davis-Besse Nuclear Power Station, Toledo Edison Company;* Probabilistic Risk Analysis Engineer

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