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February 12, 2008
L-08-040

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

Subject:
Davis-Besse Nuclear Power Station, Unit 1
Docket Number 50-346, License Number NPF-3
Submittal of the Operations Performance Independent Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

The purpose of this letter is to submit the assessment plan and related information for the year 2008 independent assessment of the Davis-Besse Nuclear Power Station (DBNPS) Operations Performance. 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," (letter DBNPS Log Number 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.

Therefore, in accordance with the Confirmatory Order, FENOC is submitting the Operations Performance Independent Assessment Plan, including the identification and qualifications of the assessors. The onsite portion of the assessment is scheduled to commence on May 12, 2008, with this 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 following the final debrief.

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There are no regulatory commitments included in this letter. If there are any questions or if additional information is required, please contact Mr. Raymond A. Hruby, Jr., Manager – Site Regulatory Compliance, at (419) 321-8000.

Sincerely,

Mark B. Bezilla

LJS

Enclosure:

A Operations Performance Independent Assessment Plan for the Davis-Besse Nuclear Power Station – 2008

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

Enclosure A
L-08-040

Operations Performance Independent Assessment Plan for the Davis-Besse Nuclear Power Station - 2008

(9 pages to follow)

OPERATIONS PERFORMANCE INDEPENDENT ASSESSMENT PLAN FOR THE DAVIS-BESSE NUCLEAR POWER STATION – 2008

NUMBER:
COIA-OPS-2008

ASSESSMENT AREA:
Operations Performance

PURPOSE:

The purpose of this assessment is to provide an independent and comprehensive assessment of Operations Performance 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 that require 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 Operations performance area. The final assessment report will provide a conclusion of the effectiveness of the assessed areas, using the rating categories contained in Business Practice DBBP-VP-0009. In addition, the assessment will compare this year's Operations Performance with that observed during the 2007 assessment.

SCOPE:

The Independent Assessment Team will evaluate the following Operations activities occurring during the assessment period using current industry standards and applicable Davis-Besse procedures:

- Shift turnover;
- Control manipulations;
- Communications, including management's expectations in accordance with the Conduct of Operations Procedure;
- Interdepartmental interfaces;
- Procedural use;
- Operations Procedure revision backlog;
- Awareness of plant and equipment status and workarounds;
- Pre-job/activity briefings;
- Non-shift Operations management interface and oversight;
- On-shift personnel manning and scheduling, including implementation of the Davis-Besse Nuclear Power Station Operations Long Range Staffing Plan;
- Shift management command and control;
- Shift management's evaluation, prioritization, and disposition of maintenance activities and emergent issues;
- Operations behaviors in the areas of questioning attitude and safety;
- Shift handling of off-normal operations;
- Observation of operator simulator training to compare crew performance, demeanor, and communication skills with actual control room operations.

SCOPE (cont.):

The Assessment Team will review selected Condition Reports related to Operations Section performance initiated since the 2007 Independent Assessment of Operations Performance and independently assess the corrective actions taken.

The Assessment Team will review the Condition Reports initiated to address the Areas in Need of Attention that were identified during the 2007 Operations Performance Assessment.

The Assessment Team will review Davis-Besse's implementation of reactivity management procedures during plant evolutions.

The Assessment Team will also evaluate the effectiveness of the Davis-Besse Nuclear Power Station's self-assessment activities associated with Operations Performance since the 2007 Independent Assessment of Operations Performance, as follows:

a. Review the results of Davis-Besse Fleet Oversight Quarterly Performance Assessments that evaluated Operations Performance. Determine if the assessments were comprehensive and if effective actions were taken to correct problems or weaknesses identified.
b. Evaluate the effectiveness of self-assessment capability by reviewing corrective actions associated with self-assessment reports, including fleet assessments and offsite safety review board activities. Evaluate the significance of a sample of other self-assessment findings to determine the effectiveness of the self-assessment effort.
c. Determine if the Davis-Besse Operations staff is aggressive in correcting self-assessment findings and determine whether the corrective actions are adequate, timely, properly prioritized, and that effectiveness reviews are ensuring the desired results.

INDEPENDENT ASSESSMENT TEAM:

- Larry E. Briggs, Independent Consultant to Silver Fox Synergies, LLC, Team Leader
- Paul H. Bissett, Independent Consultant to Silver Fox Synergies, LLC
- Mark Shaffer, Industry Peer, PSEG Nuclear
- Gregory A. Evans, Industry Peer, Watts Bar Nuclear Power Station

Biographies attached.

SCHEDULE:

- February 12, 2008: Submit assessment plan to NRC.
- April 14, 2008: Send selected documentation to team members to begin off-site preparations.
- May 11, 2008: Assessment Team will assemble near the plant for final assessment preparations.
- May 12 through May 23, 2008: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- The Assessment Team will provide a draft assessment report to and conduct a Final Debrief with Davis-Besse within 14 days (June 6) after the completion of the assessment execution week(s). The Final Debrief will conclude the assessment.
- The final assessment report will be provided to Davis-Besse within seven (7) days (June 13) following completion of the Final Debrief.
- The final Davis-Besse assessment report and action plans (if required by findings) will be submitted to the NRC by Davis-Besse within 45 days (July 21) of the completion of the assessment.

ASSESSMENT METHODS:

The independent assessment team will use the listed references as guidance to evaluate performance of the Operations section. The assessment methodology will include, but is not limited to the following:

1. Observe Control Room, Non-Licensed and Operations Management personnel in the performance of their assignments. Assessment team member shift assignments will overlap shift turnovers to compare consistency of crew operations.
    - Observe portions of at least three (3) day shifts, two (2) backshifts, and two (2) weekend shifts.
    - Observe portions of at least two (2) shifts of non-licensed activities.

2. Interview selected Control Room, Non-Licensed, and Operations Management personnel.
    - Minimum of five (5) licensed, five (5) non-licensed, and two (2) management.

3. Review selected Condition Reports (CR) and corrective actions to evaluate safety perspective, appropriate cause determination, and corrective action effectiveness. An index of Operations-related CRs will be provided for review during the off-site preparation weeks.
    - Minimum of five (5) Condition Reports.

4. Review Corrective Actions initiated to address the Areas in Need of Attention that were identified during the 2007 Operations Assessment to evaluate the scope and effectiveness of the corrective actions implemented.

ASSESSMENT METHODS (cont.):

5. Observation of simulator training during routine and abnormal operating conditions using NUREG-1021 as guidance and as a comparison with actual Control Room observations. The team will observe and evaluate licensed and non-licensed operator continuing training classroom instruction, including resolution of feedback concerning student comments.

6. Review Davis-Besse's Operations' department implementation of reactivity management during plant evolutions.

REFERENCES:

- DB-OP-00000, "Conduct of Operations"
- DB-OP-00004, "Operator Aids Control"
- DB-OP-00006, "Night Orders and Standing Order Log"
- DB-OP-00016, "Temporary Configuration Control"
- DB-OP-00018, "Inoperable Equipment Tracking Log"
- DB-OP-00200, "Shift Engineer"
- DB-OP-01002, "Component Operation and Verification"
- DB-OP-01003, "Operations Procedure Use Instructions"
- DB-OP-01200, "Reactor Coolant Leakage Management"
- NOP-WM-0001, "Work Management Process"
- NOP-OP-1009, "Immediate and Prompt Operability Determination"
- NOP-WM-2001, "Work Management Scheduling/Assessment/Seasonal Readiness Processes"
- NOP-LP-2001, "Corrective Action Program"
- NOP-OP-1002, "Conduct of Operations"
- NOP-OP-1004, "Reactivity Management"
- NOPL-OP-01002, "Reactivity Management"
- NOBP-LP-2604, "Effective Job Briefs"
- Work Process Guideline (WPG) – 2, "Operation's Equipment Issues"
- NRC Inspection Procedure (IP) 71715, "Sustained Control Room and Plant Observation"
- NRC IP 71707, "Plant Operations"
- NRC IP 93802, "Operational Safety Team Inspection (OSTI)"
- NRC IP 93806, "Operations Readiness Assessment Team Inspections"
- DBNPS Operations Long Range Staffing Plan, July 2006
- An index of Condition Reports, sorted for Operations Department involvement, June 23, 2007 through April 13, 2008
- The "Work Week Schedule" for the on-site assessment weeks
- The licensed operator on-shift schedule for the on-site assessment weeks
- The licensed operator training schedule for the on-site assessment weeks
- Last three Quality Assurance quarterly assessments
- Applicable recent internal Operations self-assessments since the 2007 Operations Assessment
- Applicable Company Nuclear Review Board minutes from last three CNRB intervals

ASSESSMENT PLAN APPROVALS:

Prepared by: Larry E Briggs Date: 2/11/2008
Larry E. Briggs, Assessment Team Lead

Approved by: Lori J Strauss Date: 2/12/2008
Lori J. Strauss, Project Manager

Approved by: Jeannie M. Rinckel Date: 2/11/2008
Jeannie M. Rinckel, Executive Sponsor

Larry E. Briggs
Independent Consultant
Silver Fox Synergies, LLC

- 2005 thru 2007 - *Silver Fox Synergies, LLC*; Team Lead, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order.
- 2004 - *Silver Fox Synergies, LLC*; Team Lead, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.
- 2001 - *Onsite Inc.*; Senior Consultant - Developed NRC written examination for the Oyster Creek Facility (May 2002 examination).
- 1977 - 2001: *U. S. Nuclear Regulatory Commission (NRC)*; Held various positions with the NRC. Duties included: Senior Operations Engineer (Chief License Examiner and Senior Inspector) - Certified Chief Examiner on General Electric (GE), Westinghouse, and Combustion Engineering plants. Responsible for review, oversight, and administration of licensed operator examinations. Scheduled and made personnel assignments for Region I licensed operator examinations and re-qualification inspections. Responsible for leading team inspections as assigned, such as maintenance rule and for cause re-qualification inspections. Also led numerous NRC routine operator licensing examination teams and re-qualification inspections. Participated in nuclear event response both in Region 1 and at the facility.
- NRC Senior Resident Inspector - Responsible for NRC inspection program at assigned facility and maintained constant interface with utility and NRC concerning plant activities and status; Senior Engineer - Responsible for oversight of NRC pre-operational testing inspection program for Region I facilities; Project Engineer - Responsible for general inspection of assigned NRC Region I facilities and coordinated NRC inspection activities at assigned facilities.
- 1972 - 1977: *Burns and Roe Inc*; Senior Startup Engineer - Responsible for development, implementation, and coordination of pre-operational test and startup procedures for assigned systems at Three Mile Island (TMI) Units 1 and 2. Also, provided on-site engineering resolution to Unit 2 problem reports during construction.
- 1960 - 1972: *U. S. Navy*; Leading CPO (USS Whale SSN 638) for Reactor Control Division. Leading In-hull instructor/Reactor Control Division Officer on D1G Prototype. Engineering Office of the Watch (EOOW) qualified on D1G Prototype. Qualified on S3G Prototype, S2Wa, and S5W Navy power plants.

Paul Bissett
Independent Consultant
Silver Fox Synergies, LLC

- 2005 thru 2007 - *Silver Fox Synergies, LLC*; Team Member, Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order.
- 2004 - *Silver Fox Synergies, LLC*; Davis-Besse Nuclear Power Station (DBNPS) Operations performance area independent assessment to identify areas for improvement and other improvement opportunities as required by the DBNPS Restart Confirmatory Order. A similar Operations performance assessment was conducted at the Perry Nuclear Power Plant.
- 2004 - *Performance, Safety & Health Associates, Inc.;* Independent Consultant – Assisted in the conduct of Licensed Operator audit examinations at the St. Lucie Nuclear Power Plant.
- 1989-2003: *U. S. Nuclear Regulatory Commission (NRC)*; Senior Operations Engineer (Chief License Examiner/Inspector) - Certified Chief Examiner on Babcock and Wilcox (1990), Westinghouse (1988) and General Electric (1999) facilities. Effectively led and conducted licensing examinations, and requalification examinations / inspections at Region I facilities.

  Assisted in the administration of operator licensing examinations in Region II (Surry) and Region III (Davis-Besse).

  Responsible for leading team inspections, including, but not limited to, operator licensing requalification, maintenance rule, problem identification and resolution, Event-V, PRA, Emergency Operating Procedure (EOPs) and operational startup inspections.

  Participated in numerous Region I plant restart inspections (TMI-1, IP-2, Salem 1/2, etc.), primarily focusing on operational safety assessments.
- 1982-1989: *U. S. Nuclear Regulatory Commission (NRC)*; Responsible for the conduct of reactor operations inspections, including the areas of maintenance, surveillance and calibration, and in-service testing of pumps and valves, including the review and approval of a licensee's 10 year In-service Test program submittal. Responsible for the review of licensee QA plan submittals and subsequent inspection of licensee QA/QC programs.
- 1977-1982: *U. S. Nuclear Regulatory Commission (NRC);* Responsible for the accountability and security of special nuclear materials at fuel fabricating facilities, including the decommissioning of one major nuclear facility, utilizing non-destructive assay techniques.
- 1970-1976: *U. S. Navy*; Four year assignment on the USS California (CGN-36) included the participation in the construction and testing of the engineering plant, nuclear core installation, pre-critical testing, initial criticality, power range testing and sea trials. As the Leading Machinery Watch (LMW), supervised aft engine room mechanical work activities. Administered preventive maintenance program.

Mark A. Shaffer
PSEG Nuclear
CFAM - Operations / Chemistry

- 1990 - Present: *PSEG Nuclear:*

  Corporate Functional Area Manager (CFAM) - Operations / Chemistry. July 2007 to present: Responsible for governance and oversight of Salem and Hope Creek Operations and Chemistry programs and processes. Ensure PSEG processes are aligned with industry best practices. Perform periodic review and assessment to ensure best practices are implemented and alignment between the stations.

  Operations Staff Superintendent. April 2007 to July 2007: Support shift coverage, Operations support of projects including Extended Power Uprate, observations to identify gaps to excellence, support of department initiatives for the Hope Creek Operations department.

  INPO Loanee - Senior Evaluator, Operational Focus. October 2005 to April 2007: Performed observations and evaluations at nine domestic nuclear plants and two international plants in support of INPO / WANO using the INPO Performance Objectives and Criteria. This included in plant and simulator observations of crew performance in all aspects, and observation of station support to ensure proper operational focus.

  Senior Reactor Operator – Hope Creek. October 1996 to October 2005: Performed the roles of Control Room Supervisor and Shift Manager, with increasing levels of responsibility for station operations and operations oversight.

  Operations Training. January 1990 to October 2006: Responsibilities and roles included simulator configuration control and testing (1990 – 1995), licensed operator instructor (1995), operations training supervisor (1996).

- 1987 – 1990: *General Physics;* Supported simulator certification of the E.I. Hatch simulator to ANSI standards. Additionally, performed classroom instruction for Hatch operator requalification and new General Physics hires for instructor certification.

- 1985 - 1987: *General Electric;* Senior Reactor Operator (SRO)-certified instructor performing classroom and simulator training and material development for various stations.

- 1977 - 1985: *United States Navy;* Machinist Mate with increasing levels of responsibility, including staff instructor at prototype (1978 – 1980), and leadership roles aboard a United States submarine, both at sea and in a shipyard overhaul.

Gregory A. Evans
Tennessee Valley Authority - Watts Bar Nuclear Plant
Shift Manager

- October 1990 to Present: *Tennessee Valley Authority – Watts Bar Nuclear Plant*

  Shift Manager. April 2006 – Present: Decision-making authority during the shift to provide instructions and guidance to operation and station personnel to ensure plant activities are conducted in an effective, safe, and consistent manner in accordance with the operating licenses, plant procedures, regulatory requirements, and established standards.

  Senior Reactor Operator/Shift Technical Advisor. January 2003 - April 2006: Performed the duties of the Unit Supervisor, Shift Technical Advisor, Work Control Center SRO and Fuel Handling SRO.

  Senior Reactor Operator training program. April 2001 - January 2003

  Program Manager Radiological Control. May 1999 – April 2001: Supervised the Radiation Control Technical Staff. Responsible for: As Low As Reasonably Achievable (ALARA) program, Radiation Work Planning, Instrumentation, Respiratory Protection, Dosimetry, and Source Control. As the Operations Staff Supervisor - Responsible for: the daily implementation of work plans, Radiation Work Permits (RWP), providing and coordinating the radiological controls necessary to support plant operations and activities. Outage support included: serving as the lead for the Containment Coordination Hit Team for Refueling Outage 3 (RF03); served as the Upper Containment Coordinator for RF03 and RF04.

  Radioactive Waste Supervisor/Engineer. October 1990 – May 1999: Developed and implemented the Radioactive Waste Management Program. Outage support included: Lower Containment Coordinator for RF01; and Upper Containment Coordinator for RF02.

- April 1986 – October 1990: *Entergy Operations, Inc. Grand Gulf Nuclear Station*

  Radioactive Waste Specialist. June 1986 – October 1990: Managed and administered the radioactive waste program.

  Radiological Control Technician. April 1986 – June 1986: Responsible for radiological controls program implementation, RWP development, job planning, and job coverage.

- April 1980 – April 1986: *United States Navy;* Leading Engineering Laboratory Technician/Engine Room Supervisor. Managed radiological and chemistry controls during operational and overhaul periods. Responsible for dosimetry control and exposure records. Supervised operational and shutdown personnel standing watch, performing duties in nuclear, steam, and other fluid systems and components.