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June 6, 2008
L-08-193

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 Organizational Safety Culture and Safety Conscious Work Environment
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) Organizational Safety Culture and Safety Conscious Work Environment (SCWE). 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.

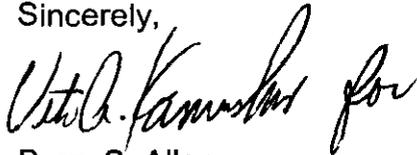
Therefore, in accordance with the Confirmatory Order, the FirstEnergy Nuclear Operating Company (FENOC) is submitting the Organizational Safety Culture and Safety Conscious Work Environment Independent Assessment Plan, including the identification and qualifications of the assessors. The onsite portion of the assessment is scheduled to commence on October 27, 2008, with this portion of the assessment lasting approximately one week. A final debrief marking the end of the assessment will be conducted with the DBNPS staff by December 12, 2008. 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. Dale R. Wuokko, Acting Manager – Site Regulatory Compliance, at (419) 321-7120.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry S. Allen for". The signature is written in a cursive style.

Barry S. Allen

LJS

Enclosure:

A Organizational Safety Culture and Safety Conscious Work Environment
Independent Assessment Plan for the Davis-Besse Nuclear Power Station – Year
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-08-193

**Organizational Safety Culture and Safety Conscious Work Environment
Independent Assessment Plan for the
Davis-Besse Nuclear Power Station – Year 2008**

(11 pages follow)

**ORGANIZATIONAL SAFETY CULTURE AND SAFETY CONSCIOUS WORK
ENVIRONMENT INDEPENDENT ASSESSMENT PLAN – YEAR 2008**

NUMBER:

COIA-SC-2008

ASSESSMENT AREA:

Organizational Nuclear Safety Culture, including Safety Conscious Work Environment

PURPOSE:

The purpose is to provide an independent and comprehensive assessment of the status of the existing Organizational Nuclear Safety Culture, including the Safety Conscious Work Environment (SCWE), at the Davis-Besse Nuclear Power Station (DBNPS). 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 and observations for other improvement opportunities. The assessment will review the areas for improvement that were identified in the 2007 Independent Assessment and it will also be used to assess the rigor, criticality, and overall quality of the DBNPS internal self-assessment activities in this performance area.

The final assessment report will provide an overall concluding statement of the effectiveness of the Organizational Safety Culture using the rating categories of DBBP-VP- 0009.

SCOPE:

The Independent Assessment Team will evaluate the following areas associated with Organizational Nuclear Safety Culture, including the SCWE:

1. The Overall Organizational Nuclear Safety Culture at the DBNPS, including the following key cultural elements and sub-elements:
 - a. Nuclear Safety Values, Behaviors and Practices
 - Nuclear Safety Standards and Expectations
 - Nuclear Safety as Top Priority
 - Operational Nuclear Safety
 - Identification of Potential Nuclear Safety Issues
 - Timely Resolution of Identified Nuclear Safety Issues
 - Effective Resolution of Identified Nuclear Safety Issues
 - Continuous Improvement of Nuclear Safety Performance
 - Confidence in the Effectiveness of the Corrective Action Program for the Identification and Resolution of Adverse Trends
 - Adverse Effects of Workload on Nuclear Safety

- b. Safety Conscious Work Environment (SCWE)
 - Indicators and precursors of a potentially chilled work environment, including personal experience of receiving negative reactions for having raised potential Nuclear Safety issues or concerns.
 - Influence of the General Site Environment on the SCWE
 - Influence of Peers on the SCWE
 - Influence of Supervision on the SCWE
 - Influence of Functional Organization Management on the SCWE
 - Influence of Site Senior Management on the SCWE
 - Demonstrated Willingness to Take Appropriate Action
 - Willingness to Inform Supervision or to Document a Potential Nuclear Safety Issue/Concern
 - Willingness to Escalate a Potential Nuclear Safety Issue/Concern to Management
 - c. Employee Concerns Program (ECP) Effectiveness
 - ECP as an Acceptable Alternative Path for Reporting/Pursuing Potential Nuclear Safety Issues or Concerns
 - Overall Employee Confidence in the ECP
 - Bases for Employee Confidence in the ECP
2. The Overall Nuclear Safety Culture, including the following key cultural elements and sub-elements, which correspond to the NRC RIS 2006-13 Safety Culture Components, will also be assessed:
- a. Human Performance Cross-Cutting Components
 - Decision-Making
 - Resources
 - Work Control
 - Work Practices
 - b. Problem Identification and Resolution Cross-Cutting Components
 - Corrective Action Program
 - Operating Experience
 - Self and Independent Assessments
 - c. Safety Conscious Work Environment Cross-Cutting Components
 - Environment for Raising Concerns
 - Preventing, Detecting and Mitigating Perceptions of Retaliation
 - d. Other Safety Culture Components
 - Accountability
 - Continuous Learning Environment
 - Organizational Change Management
 - Safety Policies

3. The Nuclear Safety Culture Assessment (NSCA) will also include an assessment of key elements of the General Culture and Work Environment (GCWE) at the DBNPS, as industry experience indicates that low GCWE ratings are frequently precursors of potential future challenges to the Nuclear Safety Culture (NSC). In this regard, the NSCA will address environmental and programmatic areas that are important to overall performance and morale and that may have an interdependent relationship with the NSC.
4. The NSCA will also include an assessment of the following two key cultural metrics related to Leadership, Management and Supervisory Behaviors & Practices because they are indirectly related to the SCWE. Low metric ratings may be leading indicators of potential future challenges to the SCWE.
 - Quality of Communications with the Workforce
 - Environment of Trust and Mutual Respect
5. Evaluation of the effectiveness of the DBNPS actions to address previously-identified Areas for Improvement in the Nuclear Safety Culture, including the Safety Conscious Work Environment. This evaluation will include the Areas for Improvement and the Areas in Need of Attention that were identified in the 2007 Independent Assessment as they relate to Nuclear Safety Culture and Safety Conscious Work Environment.
6. Evaluation of the effectiveness of DBNPS self-assessment activities and self-identification of performance weaknesses.

INDEPENDENT ASSESSMENT TEAM:

- John C. Guibert, SYNERGY Consulting, Team Leader
- Timothy K. Snyder, SYNERGY Consulting
- Dennis A. Winchester, SYNERGY Consulting Associate
- Aldo Capristo, Nuclear Management Company (industry peer)
- George M. Kusnik, Exelon – Dresden Nuclear Power Station (industry peer)

The FirstEnergy Nuclear Operating Company (FENOC) has selected SYNERGY Consulting Services Corporation (SYNERGY) to perform the 2008 Assessment.

SYNERGY has extensive experience in conducting Nuclear Safety Cultural Assessments for the commercial nuclear industry, having performed more than 100 Nuclear Safety Cultural Assessments, including 48 nuclear power plant sites, 76 nuclear power plants and 3 nuclear fuel cycle facilities. By virtue of the extent of SYNERGY's Nuclear Safety Culture Assessment activities, they are in a position to provide a meaningful frame of reference for the assessment results.

Mr. John Guibert will serve as the Team Leader for the Independent Assessment. He will be assisted by Mr. Timothy Snyder. Both of these individuals are principals of SYNERGY Consulting Services Corporation. Mr. Dennis Winchester, an Associate of SYNERGY, will also participate in the Assessment. Mr. Aldo Capristo and Mr. George Kusnik will serve as industry peer members of the Independent Assessment Team.

Biographies of the Assessment Team members are attached.

SCHEDULE:

- June 6, 2008: Develop, review and submit assessment plan to the NRC.
- September 4 through September 21, 2008: Administration of the Nuclear Safety Culture Assessment Survey to DBNPS employees and long-term contractors.
- October 27 through October 31, 2008: Personnel interviews and behavioral observations conducted onsite.
- December 12, 2008: Draft Assessment Report provided to FENOC/DBNPS management and conduct of final debrief (marking completion of the assessment).
- December 19, 2008: Final Assessment Report provided to FENOC/DBNPS management.
- Final 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 Assessment Team will utilize the following methods for the conduct of the Independent Assessment. The information obtained through each method will be integrated to reach conclusions and to identify potential Areas of Strength, Areas for Improvement (AFIs), Areas in Need of Attention (ANAs) or other opportunities for continued improvement.

1. A Nuclear Safety Culture Assessment survey developed by SYNERGY will be used. The survey questionnaire will be very similar to that used for the 2006 and 2007 Independent Assessments in order to ensure coverage of all of the necessary cultural attributes and to provide a sound basis for 2006-2007-2008 direct trending information. All DBNPS employees and long-term contractors will be provided the opportunity to participate in this survey.

SYNERGY will utilize cultural assessment models and reporting formats to analyze and report the numerical results of the written survey. Results will be provided at various organizational levels. Individual Functional Organizations that are considered to be “organizational outliers” will be identified.

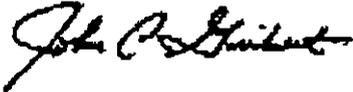
2. The Nuclear Safety Culture Assessment survey will include several opportunities for participants to provide write-in comments. The write-in comments will be analyzed by SYNERGY to validate the numerical survey results, to identify recurring themes, to obtain additional insights related to the underlying reasons for the numerical survey ratings and to identify (if applicable) additional issues not previously identified through the survey ratings.
3. The Assessment Team will conduct confidential personnel interviews of selected (by the Assessment Team) DBNPS personnel. These interviews will support a variety of assessment objectives, including the following:
 - To validate survey numerical results through the use of structured interview questions in interviews of a broad cross-section of the DBNPS organization with individuals that will be randomly selected by the Assessment Team.
 - To obtain information to support an assessment of the effectiveness of corrective actions taken by DBNPS to address the ANAs identified through the 2007 Independent Assessment of the NSC and SCWE.

- To obtain information to support an assessment of the rigor, criticality, and overall quality of the DBNPS internal self-assessment activities related to the NSC/SCWE.
 - To obtain information on RIS 2006-13 attributes that are not amenable to being assessed through an “all hands” survey of the workforce.
 - To validate/obtain information on the underlying reasons for low numerical survey ratings provided by individual Functional Organizations identified by SYNERGY as 2008 outliers with respect to industry norms criteria.
 - To validate that the numerical survey ratings provided by individual Functional Organizations with low survey participation are representative for those organizations.
4. The Assessment Team will conduct documentation reviews. Documents that will be reviewed include, but are not limited to, the following categories:
- Policies and programs related to the Nuclear Safety Culture and the Safety Conscious Work Environment.
 - Information related to the effectiveness of corrective actions taken by DBNPS to address the ANAs identified through the 2007 Independent Assessment of the NSC and SCWE.
 - Information related to the rigor, criticality, and overall quality of the DBNPS internal self-assessment activities related to the NSC/SCWE.
 - Information related to RIS 2006-13 attributes that are not amenable to being assessed through an “all hands” survey of the workforce.

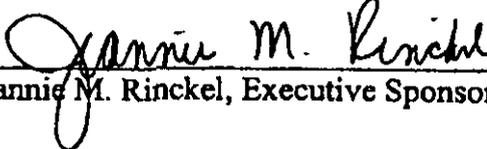
These documentation reviews will be complemented by personnel interviews with personnel responsible for the implementation and oversight of such policies, programs and activities.

5. The Assessment Team will observe selected DBNPS activities to supplement information obtained from the above methods:
- Annual DBNPS Self-Assessment of the Nuclear Safety Culture
 - DBNPS Company Nuclear Review Board (CNRB) meeting
 - DBNPS CNRB Sub-Committee meetings
 - Multiple DBNPS Management Alignment and Ownership Meetings
 - Corrective Action Review Board (CARB) Meeting
 - Supervisory Briefing
 - Multiple Work Management meetings
 - Multiple Field Observations of Maintenance (including supervisor briefings, pre-job briefs and conduct of maintenance) – I&C Maintenance, Electrical Maintenance and Mechanical Maintenance

ASSESSMENT PLAN APPROVALS:

Prepared by:  Date: June 3, 2008
John C. Guibert, Team Lead

Approved by:  Date: 6/5/08
Lori J. Strauss, Project Manager

Approved by:  Date: 6/6/2008
Jeannie M. Rinckel, Executive Sponsor

Biographies of Independent Assessment Team Members

The following biographies are summary in nature. Additional details will be provided upon request.

Mr. John C. Guibert
Independent Consultant and Assessment Team Leader
SYNERGY Consulting Services Corporation (Principal)

Mr. Guibert will serve as the Team Leader for the 2008 Independent Assessment of the NSC/SCWE at DBNPS. He previously served as Team Leader for the 2006 and 2007 Independent Assessments of the NSC/SCWE at DBNPS. He has previously served in this capacity for more than fifty similar Cultural Assessments.

Mr. Guibert has 40 years of nuclear experience. He is a graduate of the United States Naval Academy and Catholic University (MSNE). Currently, he is a principal and founder of SYNERGY Consulting Services Corporation (founded in 1992). He co-developed SYNERGY's Comprehensive Cultural Assessment methodology - a process that establishes objective measures of nuclear safety and general culture based upon models of high performing enterprises.

He was formerly Senior Vice President and Chief Operating Officer of a major technical and management consulting firm serving the commercial nuclear power industry. Prior to that, he was responsible for the development and management of a nuclear consulting practice focused on improving the performance of operating nuclear power plants. His other previous experience includes management positions with another major nuclear consulting firm, technical and management positions with the Nuclear Regulatory Commission and service as an officer in the Navy's nuclear power program.

Mr. Timothy K. Snyder
Independent Consultant
SYNERGY Consulting Services Corporation (Principal)

Mr. Snyder has over 35 years of experience in providing management and engineering consulting services to the nuclear power and other industries. He is a graduate of the University of California – Berkeley. In January of 2006, he became a principal of SYNERGY Consulting Services Corporation.

During the preceding eight years, Mr. Snyder worked as an Associate of SYNERGY, participating in the performance of comprehensive cultural assessments and improvement projects at more than twenty nuclear power and fuel processing facilities. In his consulting practice, he has specialized in management consulting focused on producing significant organizational performance improvements. His areas of management expertise include operational performance, safety and workplace culture, effective management practices, work process analysis and design, information system management, and procedure effectiveness. Mr. Snyder has also worked as an Associate of Little Harbor Consultants in the performance of safety culture assessment and improvement projects for a nuclear facility, a major oil pipeline, and a DOE nuclear waste management contractor. In his early career, he held positions with two major nuclear consulting firms.

Mr. Dennis A. Winchester
Independent Consultant
SYNERGY Consulting Services Corporation (Associate)

Dennis A. Winchester provides consulting services to the commercial nuclear power industry, specializing in the areas of nuclear oversight, safety culture assessment and safety culture-related programs and processes.

Mr. Winchester has previously participated on the Independent Assessment Teams for the safety culture assessments at Davis-Besse Nuclear Power Station (2006), Palo Verde Nuclear Generating Station (2007) and Perry Nuclear Power Plant (2008). He was also responsible for managing safety culture assessment activities at the Salem and Hope Creek Generating Stations (2006).

From May 2005 through July 2007, Mr. Winchester served as PSEG Nuclear's Vice President of Nuclear Assessment. In that capacity, he was responsible for providing leadership and oversight for nuclear assessment activities at the Salem and Hope Creek Generating Stations. In addition, he had executive responsibilities for implementation of the work environment improvement initiatives associated with the safety conscious work environment and employee concerns program improvements.

Mr. Winchester has 25 years of nuclear power plant experience. Prior to joining PSEG Nuclear, he served as the acting Nuclear Oversight Vice President, the Director of Nuclear Oversight Programs and the Ombudsman for Exelon Corporation. Mr. Winchester has worked in a quality assessment management capacity for Exelon Corporation and Commonwealth Edison (merged to form Exelon) in successively increasing levels of responsibility since 1982. In these roles, he made important contributions for performance assessment and improvement of the nuclear facilities owned and operated by Exelon and Commonwealth Edison.

Mr. Winchester has been actively involved in Industry Quality leadership forums. He participated as a working committee member in the ANS 3.2 Operating Quality Standard and sits on the Main Committee of the ASME Quality Standard, NQA-1. He was Chairman of the Nuclear Quality Management Leadership forum. Mr. Winchester is also an active participant in the Employee Concerns Program forum.

Mr. Aldo Capristo
Industry Peer Reviewer
Nuclear Management Company

Mr. Capristo has 27 years of nuclear power experience. He currently is serving as the Fleet Business Planning Director for Nuclear Management Corporation (NMC). During the past ten years, he has served as the NMC Fleet Employee Concerns Program Director, the Point Beach Nuclear Plant (PBNP) Business Support Manager, the PBNP Regulatory Affairs Manager, the PBNP Nuclear Oversight Manager and the PBNP Employee Concerns Program Manager. Prior to joining NMC, Mr. Capristo served in positions of increasing responsibility in the nuclear power programs of two other commercial nuclear power utilities and in the US Navy's nuclear propulsion program.

Mr. Capristo previously:

- Served as an industry peer on the team that conducted the 2004 and 2005 Independent Assessments of the NSC/SCWE at DBNPS
- Served as Project Manager for the conduct of an Independent Assessment of the NSC throughout the NMC Fleet (6 stations and corporate headquarters)
- Served as co-chairman of the national Employee Concerns Program Forum

Mr. George M. Kusnik
Industry Peer Reviewer
Exelon Corporation – Dresden Nuclear Power Station

Mr. Kusnik is employed with Exelon Nuclear Corporation and has 35 years of nuclear power experience with current responsibilities as an auditor and Employee Concerns Investigator within the Nuclear Oversight Department. Mr. Kusnik's background and job responsibilities during his career have also included mechanical maintenance activities, quality control inspector (i.e. welding, maintenance, structural), training instructor, mechanical maintenance first line supervisor, and station security manager.

Since late 2000, Mr. Kusnik has served as Assessor, Auditor and Employee Concerns Program Site Representative in the Nuclear Oversight Department at the Dresden Nuclear Power Station.

Mr. Kusnik previously served as an industry peer reviewer for the 2008 Independent Nuclear Safety Culture Assessment of the Perry Nuclear Power Station.