



FirstEnergy Nuclear Operating Company

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June 24, 2008
L-08-194

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 Engineering Program Effectiveness 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) 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," (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 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 22, 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 by October 17, 2008. The final assessment report and action plans, if required, will be submitted to the NRC within 45 days following the final debrief.

RECEIVED JUN 25 2008

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".

Barry S. Allen

LJS

Enclosure:

- A Engineering Program Effectiveness 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-08-194

**Engineering Program Effectiveness
Independent Assessment Plan for the
Davis-Besse Nuclear Power Station - 2008**

(17 pages to follow)

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

NUMBER:

COIA-ENG-2008

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 2007 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 2007 assessment (Permanent and Temporary Modifications)

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

- 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

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- c. The Assessment Team will review selected Condition Reports related to Engineering Section performance initiated since the 2007 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 Nuclear Oversight Reports and Audits 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.
- f. Review progress to date of Davis-Besse's initiative to develop and implement an integrated approach to improving engineering quality, including corrective actions taken in response to the cross-cutting aspects of Human Performance/Resources/Long-Term Plant Safety associated with the Green Non-Cited Violations identified during the 2007 NRC Component Design Basis Inspection. This review will assess the comprehensiveness of the actions identified, progress on implementation of the actions, and an assessment of their effectiveness to date.

6. Corrective actions taken in response to the Areas in Need of Attention (ANAs) identified during the 2007 Independent Assessment of the Davis-Besse Engineering Program Effectiveness

The Assessment Team will evaluate the responses to the five (5) Areas in Need of Attention (ANAs) identified during the 2007 Independent Assessment:

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

- 1 ANA Waivers of Design Interface Evaluation (DIE) Reviews
- 2 ANA Equipment Reliability (ER) Program – Forecast of Preventive Maintenance (PM) Strategy Workload, Single Point Vulnerability (SPV) Analysis
- 3 ANA System Health Activities – Plant Computer, 480 V AC, Radiation Monitors
- 4 ANA Analysis of Process-Related Weaknesses
- 5 ANA Assessment Strategy and Implementation

INDEPENDENT ASSESSMENT TEAM:

- John Garrity, Marathon Consulting Group, Team Leader
- Harold Baumberger, Marathon Consulting Group
- Charles Bergeron, Marathon Consulting Group
- Rod Filipek, Peer Assessor, Engineering Manager, St. Lucie Nuclear Plant, Florida Power and Light
- Bruce E. Beuchel, Peer Assessor, Project Engineer, Seabrook Station Nuclear Power Plant
- Rodney G. Pickard, Peer Assessor, Engineering Program Supervisor, Donald C. Cook Nuclear Plant

Biographies attached.

SCHEDULE:

- July 8, 2008: Send selected documentation to team members to begin off-site preparations.
- September 2, 2008 to September 12, 2008: Offsite (in office) review in preparation for onsite assessment.
- September 21, 2008: Assessment team will assemble at the plant for final assessment preparations.
- September 22, 2008 to October 3, 2008: Conduct onsite assessment and provide Davis-Besse with preliminary results prior to leaving site.
- October 17, 2008: Draft team assessment report and final debrief (marks the completion of the assessment) will be provided to Davis-Besse.
- October 24, 2008: Final team assessment report provided to Davis-Besse.
- December 1, 2008: 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.

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

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”

**Engineering Program Effectiveness Assessment Plan for the Davis-Besse
Nuclear Power Station – Year 2008**

- NOP-CC-2003, Engineering Changes
- NOP-CC-3002, Calculations
- NOP-LP-2001, Condition Report Program
- Action items from NRC inspection reports issued since September 21, 2007, 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 21, 2007
- Davis-Besse Nuclear Oversight Reports and Audits 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: 6/23/08
John H. Garrity, Assessment Team Lead

Approved by: Lori J. Strauss Date: 6/24/08
Lori J. Strauss, Project Manager

Approved by: Jeanne M. Rinckel Date: 6/24/2008
Jeanne M. Rinckel, Executive Sponsor

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

BIOGRAPHIES

**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 areas 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 led high impact teams to resolve problems.
 - Team Leader, Davis-Besse Independent Assessment of Engineering Programs Effectiveness 2004, 2005, 2006, and 2007
- 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 and 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.

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

John H. Garrity (continued)

- 1984-1988: *Maine Yankee Atomic Power Co*; Plant Manager/Senior Site Manager - Responsible for site operations.
- 1984: *Maine Yankee Atomic Power Co*; Assistant Refueling Manager - Special assignment, monitored several dozen engineering projects and coordinated activity with overall refueling effort.
- 1980-1984: *Maine Yankee Atomic Power Co*; Director, Nuclear Engineering and Licensing - Responsible for overall coordination of reload design, plant safety analysis and nuclear engineering analysis of plant systems, emergency planning, and radiological monitoring.
- 1975-1980: *Central Maine Power Co.*; Principal Nuclear Engineer for Central Maine Power Co. (1976 –1980), project engineer for two new reactor sites (1975)
- 1970-1974: *Maine Yankee Atomic Power Co.*; performed primary/reactor and secondary plant systems performance monitoring (1973-1974), Reactor Engineer & Startup Test Supervisor for commissioning of the Maine Yankee reactor (1970-1972)

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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 Plant’s 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, 2006, and 2007.
 - 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 (QA) 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.
 - Performed assessment of Design Basis programs at Vermont Yankee, including Design Basis document program development.

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Harold E. “Rusty” Baumberger (continued)

- 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 Province 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.

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

Charles Bergeron
Senior Consultant
Marathon Consulting Group

- 1995 – present: *Marathon Consulting Group*; Senior Consultant
 - Team Member - Davis-Besse Independent Assessment of Engineering Programs Effectiveness in 2006
 - Palisades – single point vulnerability studies, electrical and I&C systems
 - Nine Mile Point - provided consulting for Electrical Switchyard upgrades and support to the power systems assessment and single point vulnerability assessment tasks associated with the Equipment Reliability Improvement Program.
 - Florida Power and Light - prepared specifications for the procurement of replacement Control Rod Drive Motors (CRDM) associated with the reactor vessel head replacement project at Turkey Point and St. Lucie.
 - Nine Mile Point - provided industry expertise and acted as a “White Team” member and critical reviewer for regulatory actions required by NRC IMC 0305 for White Performance Indicators at Units 1 & 2. Assisted in the successful preparations for the NRC Inspection Procedure 95001 Inspections at both Units.
 - Performed a Digital Control Complex Upgrade Survey/Study performed for a Japanese Utility and consulted on their plans for a plant control room upgrade.
 - D. C. Cook Nuclear Plant - provided design review, licensing support, and construction coordination of Control Room HVAC Systems improvements to conform to new Lake Temperature requirements.
 - Wolf Creek Nuclear Station - provided computer systems consulting for the Y2K issue and assisted the Project Manager in meeting project goals by expediting problem areas.
 - Clinton Nuclear Power Station - Detailed Design Review Team member for an Engineering Quality Assessment performed to support the Restart Program.
 - Central Maine Power (CMP) - reviewed Business Plan development activities to assess the overall company position to address stockholders concerns and prepare for deregulation.
 - Cooper Station / Nebraska Public Power District - participated in the Configuration Management Assessment Project.
 - South Texas Project - developed a re-engineered approach to Quality Assurance (QA) Procedures and participated in a training assignment for the Training Department in Project Management.
 - Maine Yankee - participated on corporate engineering Independent Safety Assessment Response Team. Conducted a review of a Maine Yankee’s FSAR to current design basis, identifying and resolving apparent discrepancies. Prepared FSAR changes, Design Basis Summary Document updates, plant modification packages, and other engineering information as needed to completely resolve issues found during reviews.
- 1988 – 1995: *Grove Engineering, Inc.* - Vice President and Director - founded and managed the Boston Office, which specialized in Power Plant Life Extension, Severe

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

Charles Bergeron (continued)

Accident Analysis, Information Management Systems, and innovative solutions to industry problems. Acted as Project Manager at Maine Yankee as for major outage modifications, including main electric generator replacement, containment penetration replacement, and radiation monitoring system upgrades.

- 1987: *FIW Corp*; COO, Vice President and Director - responsible for overall management of administrative, retail, contracts, and finance, with specific responsibility for the profitability of the company and acquisition strategy.
- 1984 – 1987: *Stone & Webster Engineering Corp.*; Consultant - performed numerous studies for plant life and license extension efforts. Managed special Task Force for Nuclear Safety Studies and was Special Projects Manager for Maine Yankee Atomic Power Station.
- 1979-1983: *Stone & Webster Engineering Corp.*; Supervisor - responsible for the Nuclear Safety Group, Nuclear Safety Task Force, Engineered Safety Systems and Analysis (Thermal-Hydraulic) Group, and the Emergency Planning Group.
- 1978-1979: *Stone & Webster Engineering Corp.*; Senior Engineer - responsible for management systems development, corporate I&C standards, problem reporting system, and other Design Review Board functions.
- 1974-1978: *Stone & Webster Engineering Corp.*; Control Engineer - Lead Engineer for Control Systems on fossil and nuclear powered electric plants.
- 1972-1973: *Stone & Webster Engineering Corp.*; Engineer - responsible for I&C section of engineering and design of a dual unit nuclear power station.
- 1970-1971: *Stone & Webster Engineering Corp.*; Field Engineer - responsible for construction and testing of I&C systems for a natural gas fired power plant.
- 1967 – 1970: *Bettis Atomic Power Laboratory*; Joint Test Group member / Bettis Technical Advisor - responsible for on-site direction of testing of nuclear power plants for naval vessels and directed decontamination of two nuclear reactors with personal onsite control of the evolution, including emergency response management.

Engineering Program Effectiveness Assessment Plan for the Davis-Besse Nuclear Power Station – Year 2008

Bruce E. Beuchel
Project Engineer
FPL Energy Seabrook, LLC

- Aug 2005 - Present: *Seabrook Station Nuclear Power Plant*; Project Engineer – Responsible for engineering activities on major projects. This includes coordination of FPLE resources and oversight/contract management of contracted engineering resources. Ongoing projects include, Digital Turbine Controls, Loose Parts Monitoring System Replacement, Incore Detector System Replacement, and planning for Digital Feedwater Controls. Recently completed projects include Generator Protective Relaying, P-9 Setpoint Change, Steam Generator Level Control Enhancements, CADD System Upgrade, RWST Silica Removal System, and Thermal Camera Modification for Security System. Also prepared procedure infrastructure for station Capital Projects Engineering Group and created an introductory guide for contracted engineers to improve contractor efficiency.
- Jul 1998 - Aug 2005: *Seabrook Station Nuclear Power Plant*; Project Manager - Responsible for the completion of major projects ranging in value from \$0.1M to \$17.1M. Projects have included the installation of several camera systems, two large building air conditioning systems, and the addition of a partial flow Condensate Polisher System. For several years during this period also responsible for the performance controls group (cost reporting and estimating) and other project managers.
- Aug 1996 - Jul 1998: *Seabrook Station Nuclear Power Plant*; Engineering Performance Manager - Responsible for Reliability and Safety Engineering Group, including Plant Safety Assessment (PRA); Program Support Group (ASME code testing requirements and Predictive Maintenance programs); and Configuration Management Group (responsible for drawing maintenance, and records retention of original engineering documents).
- Jan 1996 – Aug 1996: *Millstone Point Unit 1*; Temporary assignment as the Design Engineering Manager - Part of the initial recovery team to restore Millstone Unit I to operation. Reorganized the design engineering department and identified the scope of the work necessary for restart. The effort included both design basis reconstitution, and identification and preparation of modifications. Initiated changes in the design engineering organization in the area of work planning and time reporting, increased the technical standards, and worked on resolution of infrastructure deficiencies, such as equipment data bases.
- Oct 1994 - Jan 1996: *Seabrook Station Nuclear Power Plant*; Engineering Performance Manager - The responsibilities were essentially the same as indicated for the period of Aug. 1996 to July 1998 and also included the Engineering Services Group which was responsible for engineering assurance and provided the administrative support to the entire engineering department.
- Jan 1994 - Oct 1994: *Seabrook Station Nuclear Power Plant*; Temporary assignment as the Mechanical Design Engineering Manager - Responsible for Mechanical Engineering Group (civil/structural engineering, pipe stress analysis, support design and stress analysis, seismic analysis, etc.); NSSS System Engineering Group (system design, pumps, valves, system interactions, etc. for the piping systems supplied by the

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Bruce E. Beuchel (continued)

NSSS vendor); and Balance of Plant System Engineering Group (similar responsibilities to the NSSS group, but on systems supplied by the architect engineers). These groups prepared design modifications for the station and responded to day to day questions with regard to the design bases of mechanical systems for the station.

- Dec 1988 - Jan 1994: *Seabrook Station Nuclear Power Plant*; I&C Engineering Supervisor - Responsible for the supervision and technical direction of I&C engineering, responsible for preparing all I&C design change packages. Recipient of the utility's "Values for Excellence" Award in 1990.
- Mar 1985 - Dec 1988: Assigned to the -Seabrook Project in Framingham/Bolton office for Yankee Atomic Electric Co. - Member of group responsible for oversight of architect engineering I&C work for the completion of construction of Seabrook Station. Performed initial verification of technical values in Seabrook Technical Specifications. Following construction, responsible for preparation of I&C design changes.
- Aug 1984 - Mar 1985: *General Electric Company*; Engineer in Startup, Test and Operations Group - Completed SRO Certification on Black Fox BWR-6 simulator. Assigned as a test engineer at Shoreham for three months.
- Nov 1980 - Aug 1984: *Seabrook Station Nuclear Power Plant*; Senior I&C Engineer
- Jun 1975 - Oct 1980: U S Navy; Division Officer on board the USS Tecumseh (SSBN 628) - Qualified to stand watch as Engineering Officer of the Watch (EOOW) responsible for the operation of the nuclear power plant and as Officer of the Deck (OOD) responsible for the operation of the entire ship. Passed Engineer's Exam for Navy Nuclear program.

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Rod Filipek **Engineering Manager, Performance and Improvement** **St. Lucie Nuclear Power Plant, Florida Power & Light**

- April 2008 – Present: *St. Lucie Nuclear Plant, Florida Power and Light*; Engineering Manager - Performance and Improvement – Manage the training, CAPCO, budget, planning and HU personnel for Engineering.
- January 2006 – April 2008: *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.

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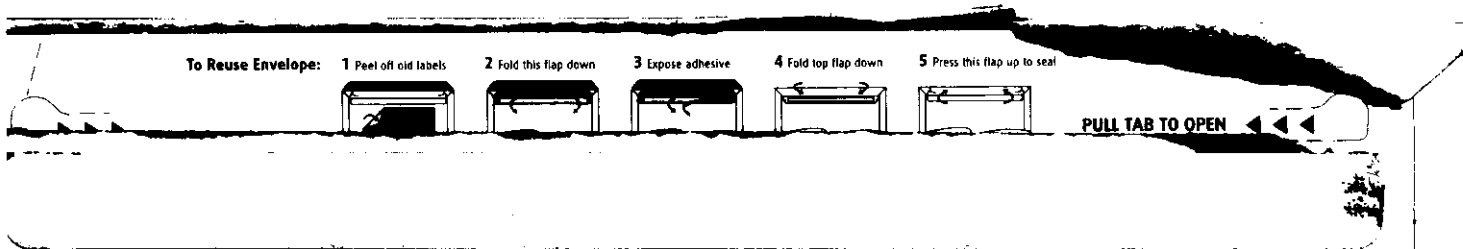
Rodney G. Pickard
Engineering Programs Supervisor
Donald C. Cook Nuclear Plant, American Electric Power

- June 1997 – Present: *Donald C. Cook Nuclear Plant, American Electric Power:*
 - August 2006 – Present: Engineering Programs Supervisor - Responsible for the implementation of various Engineering Programs to ensure compliance with applicable technical specification, ASME code requirements, INPO best practices, and industry standards including:
 - In-Service Inspection
 - In-Service Testing
 - Flow Accelerated Corrosion
 - Steam Generator Tube Integrity
 - Boric Acid Corrosion Control
 - Appendix J
 - Welding
 - GL 89-13 and BOP Heat Exchanger Inspections
 - Tank Inspections
 - Notable accomplishments include
 - Two industry records for completion of containment integrated leak rate tests
 - Implementation of risk informed in-service inspection
 - June 2003 – August 2006: Probabilistic Risk Assessment Engineer –
 - Development and application of probabilistic risk models for Donald C. Cook Nuclear Plant
 - Perform maintenance rule (a)(4) configuration risk assessments for planned activities
 - Analyze plant events in accordance with the Significance Determination Process
 - Preparation of risk basis for emergency technical specification changes
 - Train Engineering and Operations personnel on PRA methods and risk informed applications
 - June 2001 – June 2003: Training Supervisor –
 - Administer the accredited training program for Donald C. Cook Nuclear Plant engineering personnel
 - Evaluate the effectiveness of the engineering training program, curriculum, materials, facilities, and instructional staff to develop continuing improvement plans
 - Implementation of the Systematic Approach to Training
 - Provide the infrastructure necessary for maintaining an adequate supply of well-trained, qualified individuals to meet the operational and outage needs of the plant
 - Responsible for hiring decisions and conducting performance evaluations

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Rodney G. Pickard (continued)

- June 1997 – June 2001: Nuclear Fuel Safety and Analysis Engineer --
 - Purchase uranium concentrates, conversion services, and enrichment services for Cook Nuclear Plant
 - Negotiate and maintain a portfolio of intermediate and short term contracts for the supply of nuclear fuel and related services
 - Project management of cycle specific reactor core design, fuel fabrication, delivery, and installation
 - Preparation of design change packages
 - Fuel cycle management and fuel safety analysis subject matter expert
 - Reactor engineering support for plant startup physics testing, initial criticality, and power ascension
 - Reactor physics analyst for the emergency response organization



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