FENOC

FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
10 Center Road
Perry, Ohio 44081

Mark B. Bezilla
Vice President

440-280-5382
Fax: 440-280-8029

June 7, 2011
L-11-196

ATTN: Mr. Steven West
Director, Division of Reactor Projects, Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

SUBJECT:
Perry Nuclear Power Plant
Docket No. 50-440, License No. NPF-58
Readiness for NRC Human Performance Inspection

In the Perry Nuclear Power Plant (PNPP) Annual Assessment Letter dated March 4, 2011, you stated, in part, "Prior to the 2011 mid-cycle assessment, the NRC will conduct an inspection of the long-standing, human performance substantive cross-cutting issue, beyond the baseline inspection program. Following the receipt of a letter from you informing us of Perry's readiness for inspection, the NRC will perform an inspection to assess the effectiveness of your corrective actions in addressing the human performance substantive cross-cutting issue, and specifically the theme in work planning (H.3a). The inspection will focus on evaluating Perry's progress in developing and implementing those corrective actions and the metrics and measures used to determine performance improvement effectiveness."

The PNPP staff has developed and taken action to address shortfalls in human performance, specifically in the area of work planning (H.3a). However, several human performance shortfalls were experienced in the recent 1R13 refueling outage that warrant further review, evaluation and corrective measures. A common cause analysis (CCA) assessment of PNPP's human performance will be performed at the conclusion of 1R13. The CCA will utilize site, fleet and external resources to look for further causes in performance shortfalls and recommend additional corrective actions to further strengthen PNPP's human performance.

As a result, PNPP requests that the NRC retarget the inspection activities described in the March 4, 2011, letter until just prior to the 2011 end-of-cycle assessment in the late November to early December time frame. This would allow time for additional assessment and corrective action activities, as well as provide more time to demonstrate sustained performance improvement in the human performance area.

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There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Robert Coad, Manager - Regulatory Compliance, at (440) 280-5328.

Sincerely,

Mark B. Bezilla

cc: NRC Regional Administrator, Region III
NRC Project Manager
NRC Resident Inspector
NRC Document Control Desk

FENOC

Perry Nuclear Power Plant
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FirstEnergy Nuclear Operating Company

Regulatory Compliance Section
Mail Stop - A210

06/08/2011

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