

December 2, 2005

EA #03-214

Mr. Mark B. Bezilla
Vice President-Nuclear, Davis-Besse
FirstEnergy Nuclear Operating Company
Davis-Besse Nuclear Power Station
5501 North State Route 2
Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION
NRC SPECIAL INSPECTION - MANAGEMENT AND HUMAN
PERFORMANCE CORRECTIVE ACTION EFFECTIVENESS -
REPORT NO. 05000346/2005016(DRP)

Dear Mr. Bezilla:

On October 19, 2005, the NRC completed a Special Inspection at FirstEnergy Nuclear Operating Company's (FENOC) Davis-Besse Nuclear Power Station. The inspection was to assess the effectiveness of FENOC's corrective actions in response to deficiencies identified through its October 2004 Safety Conscious Work Environment (SCWE) survey and its subsequent 2004 independent Safety Culture (SC)/SCWE assessment, which the NRC's March 2004 Confirmatory Order required.

Following the identification of organizational effectiveness and human performance as one of the principal causes of the reactor pressure vessel head degradation in 2002, the NRC conducted a series of special inspections of the management and human performance area. These inspections were designed to evaluate the effectiveness of FENOC's corrective actions in this area. The overall inspection plan was designed to assure that an appropriate root cause analysis had been completed (Phase 1- Report No. 05000346/2002015, dated February 6, 2003), that appropriate corrective actions had been identified and implemented (Phase 2 Report No. 05000346/2002018, dated July 24, 2003), and that the effectiveness of those corrective actions was assessed (Phase 3 Report No. 05000346/2003012, dated February 27, 2004).

During the final stages of the Phase 3 inspection, FENOC provided the NRC with detailed results from its November 2003 SCWE survey. Because several key departments had responded more negatively to some questions than in the March 2003 survey, a follow up Inspection (Report No. 05000346/2004003, dated March 31, 2004) was conducted to understand the causes for the increase in negative responses. An additional follow-up Inspection (Report No. 05000346/2004013, dated October 17, 2004) was conducted to assess the effectiveness of your corrective actions for the identified deficiencies.

Similar to the November 2003 SCWE survey, the results from both your October 2004 internal SCWE survey and the 2004 independent SC/SCWE assessment indicated key departments had responded more negatively to some questions than in the November 2003 survey.

In response to the continued decline in positive responses, the NRC concluded that a two part inspection would be conducted. Part 1 was designed to review the 2004 internal survey and 2004 independent assessment to understand why there continued to be a downward trend in SC/SCWE. That effort would be followed by Part 2, a detailed inspection into the staff's perceptions after corrective actions were in place. The results of the first inspection were provided in Inspection Report Number 05000346/2005006, dated June 10, 2005.

Part 2 was concluded on October 19, 2005. The NRC independently evaluated FENOC's corrective action effectiveness in addressing the deficiencies from the 2004 SCWE survey and 2004 independent SC/SCWE assessment. In accomplishing the inspection, the NRC evaluated the perceptions obtained from individuals through focused group interviews, keeping in mind that the perceptions may not directly translate to actual performance.

The inspection concluded that the corrective actions implemented at Davis-Besse to improve its SC and SCWE following the 2004 SCWE survey and 2004 independent SC/SCWE assessment have had an overall positive effect, prompted in large part by a change in organizational behavior during the January 2005 mid-cycle outage. The NRC Team noted that for the first time since 2002, Davis-Besse staff pointed to specific management actions that had improved SC and SCWE at the site. However, the team also noted that two departments continued to exhibit negative responses. The negative responses were seen in interviews conducted by the NRC and in a July 2005 licensee survey. In both cases, the continued negative responses appeared to be attributable to issues unique to each department. No findings of significance were identified during the inspection.

Based on the results of this inspection, we have concluded that the SC and SCWE at Davis-Besse are improving and acceptable to support continued facility operation.

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Sincerely,

/RA/

Mark A. Satorius, Director
Division of Reactor Projects

Docket No. 50-346
License No. NPF-3

Enclosure: Inspection Report 05000346/05-16
w/attachments: 1. Supplemental Information

cc w/encls: The Honorable Dennis Kucinich
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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-346
License No: NPF-3

Report No: 05000346/2005016

Licensee: FirstEnergy Nuclear Operating Company

Facility: Davis-Besse Nuclear Power Station

Location: 5501 North State Route 2
Oak Harbor, OH 43449-9760

Dates: September 12 - October 19, 2005

Inspectors: G. Wright, Team Lead, Region III

Team Members: J. Persensky, RES
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Approved by: M. Satorius, Director
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000346/2005016, FirstEnergy Nuclear Operating Company, on September 12 - October 19, 2005, Davis-Besse Nuclear Power Station. Special Inspection.

This report covers a special inspection continuing the NRC's review of the long term effectiveness of the licensee's corrective actions (CA) associated with the deficiencies identified through the October 2004 Safety Conscious Work Environment (SCWE) survey and the 2004 independent Safety Culture (SC)/Safety Conscious Work Environment assessment. The inspection was conducted by NRC inspectors and specialists (Team). The inspection concluded that in general, the CAs were effective, with exceptions noted below.

The results of the inspection indicate that for the first time since 2002, Davis-Besse staff has attributed specific actions by licensee management as having a positive impact on some of the elements impacting safety culture and safety conscious work environment. Specifically, changes in behavior relative to work management during the January 2005 mid-cycle outage, addressing issues with respect to their significance rather than their impact on schedule, and encouraging and recognizing the staff's identification of issues were cited by licensee staff as having a positive impact.

The Team concluded that overall, actions by the licensee have resulted in improvements in the SC/SCWE at Davis-Besse. Notwithstanding the overall positive assessment, two departments continued to exhibit negative responses in the surveys. In addition, the Team was concerned about the perceptions, identified in a number of departments, regarding independence and confidentiality of the Employee Concerns Program (ECP) and the issues raised in one department regarding the identification and prevention of retaliation.

Summaries of the five areas assessed during this inspection are provided below.

Willingness to Raise Concerns and Management Support

Most of those interviewed indicated that they would be willing to raise concerns and that management encourages workers to raise nuclear safety concerns. Further, individuals indicated they would have no concerns about challenging management regarding non-conservative decision making. However, in two specific work groups, several workers stated that they would be hesitant to raise concerns in non-nuclear safety areas.

Overall it appears that the Davis-Besse staff is giving management the opportunity to demonstrate during the upcoming refueling outage, that the behaviors exhibited during the mid-cycle outage are permanent changes in the approach management is taking to operating the facility.

Effectiveness of Corrective Actions

There appears to be overall improvement in the workforce's confidence in the corrective action program that has positively affected the SCWE at the site. However, areas of continued concern were identified during the focus interviews pointing to the need for additional communications in a number of areas.

Employee Concerns Program (ECP)

Improvements in ECP visibility have been made; however, some Davis-Besse staff continue to have concerns regarding the program's independence and confidentiality. The perceptions regarding independence and confidentiality may limit individuals' willingness to use the system and therefore limit the ECP's effectiveness.

Safety Conscious Work Environment Review Team (Ability to detect and prevent retaliation)

There was general improvement in this area; however, it should be noted that in one department, a number of individuals indicated that they observed an act of retaliation. The NRC is concerned that if left unaddressed, the issues in the department of concern have the potential to cause a chilled work environment in the department.

Additional Issues Affecting Safety Culture

The licensee continues to implement a number of initiatives to improve communications between management and staff at Davis-Besse. The initiatives have been shown to be valuable tools for improving communications at the site. However, it appears that the effectiveness of the communication tools has been hampered because the intent and implementation of the tools have not been verified nor actions taken to make adjustments as necessary.

Inspection Details

I. Scope

The inspection was accomplished by a special inspection team consisting of NRC inspectors and specialists (Team). The inspection was designed to assess the licensee's compliance with 10 CFR 50 Appendix B Criterion XVI, by evaluating the effectiveness of the licensee's management and human performance corrective actions (CAs) developed from an assessment of its October 2004 Safety Conscious Work Environment (SCWE) survey and the Confirmatory Order required 2004 independent Safety Culture/Safety Conscious Work Environment assessment. The Team conducted nineteen focus group interviews with six to eight licensee staff in each focus group.

II. Objective

The inspection was designed to independently assess the effectiveness of the licensee's CAs related to the decline in positive responses between the November 2003 and October 2004 SCWE surveys, and issues raised in the Order required 2004 independent SC/SCWE assessment.

III. Assessment Process

A. Inspection Basis

The inspection consisted of a review of the CAs identified by the licensee, an independent assessment of the effectiveness of the CAs, a review of the licensee's assessment method and report, and observations and discussions with individuals from ten licensee departments.

The Team used focus group interviews and discussions with the Teamwork, Ownership, and Pride (TOP) team, along with document review as input to its assessment. The Team also reviewed related documents listed in Attachment 1.

B. Inspection Approach

The Team used the following techniques to perform the inspection:

1. Independent review of documents, e.g.;
 - a. Employee Concerns Program (ECP) survey data
 - b. Monthly Safety Culture (SC) Performance Indicators (PIs)
 - c. Condition Report (CRs) and Corrective Actions (CAs)
 - d. Results from the independent SC/SCWE assessment
2. Focus group interviews were conducted with staff from:
 - a. Operations
 - b. Maintenance
 - c. Chemistry
 - d. Nuclear Quality Assessment (NQA)

- e. Training
- f. Design Engineering
- g. Plant & Equipment Engineering
- h. Work Control
- l. Technical Services Engineering
- j. Security
- k. Supervisors, all departments

3. Discussions with members of the licensee's TOP Team.

IV. Assessment, Observations, and Conclusions

A. Corrective Action Effectiveness

1. Scope

The Team used the focus group interview approach to assess the effectiveness of the licensee's CAs. The Team used the licensee defined four pillars of SCWE: Willingness to Raise Concerns, Normal Problem Resolution Process, Employee Concerns Program, and Preventing and Detecting Retaliation, as the basis for its interviews. This was done to better relate its observations to those survey areas that showed decline.

2. Observations:

Observations are presented by SCWE Pillar.

a. Pillar 1: Management Support - Worker Confidence - Raise Concerns Without Fear of Retaliation

Observations:

During both the focus group interviews and the individual interviews, most of those responding indicated that they would be willing to raise concerns and that management encourages workers to raise nuclear safety concerns. Further, those interviewed said they would freely raise issues or document the issue(s) without fear of retaliation. They also indicated that they would have no concerns about challenging management regarding non-conservative decision making. There is a prevailing opinion in most departments sampled, that the improvement in the willingness to raise issues is due to concerns being addressed more expeditiously because management has made this a priority, management has been more encouraging of raising concerns, and there is no fear among the staff that documenting an issue could result in some form of punishment. Some expressed the opinion that management now exhibits an attitude that they will not shy away from fixing problems and will address issues even if it there was a negative impact on schedule. The pivotal event appears to be the January 2005 mid-cycle outage. Most staff viewed the management behaviors exhibited during the mid-cycle outage positively. They also indicated that continuation of the behaviors would allow for significant improvements in the future and will remove additional barriers to raising concerns.

Examples of this positive approach, provided by Davis-Besse staff, are statements in an all-hands meeting by FENOC's President, that encouraged employees to raise concerns. Many line managers encourage employees to raise concerns and some employees have been recognized and rewarded for their efforts in identifying problems. In one focus group, the employees noted a positive example, when their manager recognized, in the midst of a meeting, that he was demonstrating behaviors that were not conducive of a strong safety culture. The manager stopped, apologized, and then continued the meeting with a positive approach. In another instance a mid-level manager stopped and challenged a more senior manager who was behaving in a manner inconsistent with a strong safety culture and told him - "We don't do that around here anymore." Most often cited during the interviews was that, during the mid-cycle outage, the Work Management group had a "How can we help you?" attitude, rather than focusing solely on schedule. In addition, workers noted that there was more communication on the justification for the operational decisions being made.

Other examples of positive change that encouraged raising concerns were also noted. Some people felt that management was more receptive to conservative decision-making and to opposing viewpoints. Many workers interviewed perceived that improvements in conservative decision-making has had a positive influence on worker willingness to raise issues. Examples of this were prevalent during the mid-cycle outage, but have also been witnessed since then. During the outage, there were issues related to leakage and air voids in the decay heat removal pump. Employees and management knew that proper analysis and repair of the pump would extend the outage. Despite the extension, management proceeded with the corrective action. In a more recent example relative to the auxiliary boiler, maintenance uncovered a problem that required Operations support. Work was stopped temporarily while management was called. Management directed that all work was to be stopped until the equipment problem was resolved so that work could proceed safely. Some groups also indicated that they were more comfortable raising concerns since they have had stable management for a relatively long period.

While there were many examples of support for raising concerns and issues, there were also some negative items stemming from the Team's interviews, especially with specific work groups. Two departments were most negatively outspoken. In one of the departments, individuals indicated an unwillingness to write CRs because there would be no follow through corrective action. In one instance an individual was told not to write anymore CRs on a particular issue because a special report was being prepared on his issues, but nothing was done. Individuals in the same department were also told not to report issues to the site Vice President because the department reported to FENOC headquarters, not to the site Vice President. Staff members from the other department also raised many concerns, but appeared to focus mostly on a work hours schedule change that resulted from the union negotiations. Staff from this department indicated challenging immediate supervisors was viewed as acceptable, but they would be hesitant to challenge higher levels of management. There was also a concern raised again that the CAP program effectiveness is hampered because of volume of issues in the system.

It should be noted that based on feedback from the Team, the licensee immediately initiated an independent review of the issues associated with writing condition reports and not talking to the Site Vice President. While the independent review did not substantiate either issue, the licensee has taken actions to address both issues and the work environment.

A few individuals from other departments also expressed negative views on preparing CRs. Some Maintenance employees indicated that if you write a CR you are expected to prepare the response to it and that takes away from your other assignments, or you have to work on it on your own time or on overtime. There were a few lingering concerns over the "feedwater 780" incident, in that the case study identified the problem as a breakdown in numerous barriers, thereby implicating everyone involved, when the prevailing perception was that one particular individual played the crucial role. In another area, the lack of effective communications regarding the policy on sending individuals home who were involved with an incident was cited as a barrier to raising concerns, though no one indicated that they would not raise a safety concern. Issues related to poor prioritization and low thresholds for writing CRs continue in some departments, though it is not as prevalent as it was in earlier inspections. The Team noted that a new CAP input system (SAP) is being implemented that may reduce this specific concern.

In general the staff voiced a "wait-and-see" attitude on whether the management performance exhibited during the mid-cycle outage would be sustained during the upcoming refueling outage.

Conclusions:

Most of those interviewed indicated that they would be willing to raise concerns and that management encourages workers to raise nuclear safety concerns. Further, they would have no concerns about raising or documenting issues. They also indicate that they would have no concerns about challenging management regarding non-conservative decision making. However, in two specific work groups, there were several workers that stated that they would be hesitant to raise concerns in non-nuclear safety areas.

A wait-and-see attitude exists with regard to the continuation of recent changes in management behaviors into the upcoming refueling outage (RFO 14). Overall, there appears to be improvement in this area from earlier assessments.

b. Pillar 2: Effective Normal Problem Resolution Processes (Effectiveness of Corrective Action Program)

Observations:

Individuals in the focus groups believed that improvements in the effectiveness of the correction action program have had a positive effect on SCWE. Many of the groups interviewed indicated that they have seen improvements in the timeliness of resolving issues and in the feedback they receive on how issues are being resolved. Individuals indicated that they are more confident about

raising issues because they have seen a change in the way issues are addressed. Individuals also said that there has been a reduction in the maintenance backlog. They are seeing an improvement in management's willingness to address concerns, and that it has a direct impact on the amount of work in the backlog. Further, the implementation of a Duty Team, which consists of employees from across the disciplines who are able to quickly resolve concerns, without having to raise concerns through multiple layers of management, has improved the timeliness of issue resolution. For example, instead of an issue being presented to Engineering, assessed, then sent to Operations for resolution, the Duty Team was able to expedite the process because workers from both Engineering and Operations are represented. The Duty Team was seen by employees as very effective in resolving issues in a safe manner and with staff input.

Not all of the feedback during the focus group sessions was positive. The Team heard that the staff is seeing an increase in workload without a corresponding increase in staff to take on extra assignments. This has created a feeling of discontent among many employees. They feel that management isn't providing them with enough resources to accomplish the work done in a timely manner. Many people told the Team they still feel as if "lower priority" issues are taking too long to resolve. While they see an improvement overall in management's ability to address issues, there are still concerns that non-critical or non-safety related items are not being addressed quickly enough. There seems to be some disagreement between management and staff on the priority of issues. Specifically, there were some comments from some departments about poor communication about the prioritization of issues, and the reasons why some concerns were not being addressed. The Team also heard comments regarding the classification of issues, with some believing that the process is overly conservative, that is, items were at times receiving too high a priority given their actual significance. The Team noted that the licensee has recently implemented a revision to its program for documenting deficiencies. The new program (SAP) provides different work paths for deficiencies based on their safety status.

Individuals expressed concern regarding transition from the current CAP input system to the new SAP. Currently, every item or issue is captured in a condition report and placed in the CAP program. The new program will separate items based on significance. Some workers are concerned that the new system would allow issues to "fall through the cracks" because they don't have a direct impact on safety. This has resulted in the staff's perception that there needs to be more effective communication about how management will ensure that all concerns will be addressed.

As previously mentioned, the Team continued to hear that the threshold for writing CR's is still too low. Many felt that the program gets "bogged down" and important issues are not able to be addressed as quickly as they should be. Although this was the perception of some employees onsite, the Team also heard that others were eager to see if the SAP process will be effective in addressing this concern once it is in place.

Conclusions:

There appears to be overall improvement in the workforce's confidence in the corrective action program that has positively affected the SC and SCWE at the site. Areas of continued concern were identified during the focus interviews pointing to the need for additional communications in a number of areas.

c. Pillar 3: Effective Alternate Problem Resolution Processes
(Employee Concerns Program)

Observations:

Based on information gathered by the Team during focus group interviews, there has been minimal change with regard to individual's perceptions of the effectiveness of the Employee Concerns Program (ECP) since the NRC's last inspection into the site's management and human performance corrective action effectiveness (Inspection Report No. 05000346/2004013(DRP)). Most of the staff interviewed were aware of the Employee Concerns Program and the process to follow in order to raise a concern through this Program. Most licensee staff interviewed were also aware of recent efforts to re-familiarize the staff with the ECP and believed that the Program was confidential and effective. There appeared to be improvement, since the site's October 2004 survey and a supplemental SCWE survey conducted in July 2005, regarding the perception of the program's confidentiality.

However, some individuals continued to believe that the program is neither independent nor confidential. These perceptions generally stemmed from an opinion that the ECP was an extension of management and would simply refer issues raised through the Program to line management. Some individuals interviewed were under the impression that because contractors used in the program during 2003 and 2004 had left, the program had reverted to an Ombudsman Program, such as the plant utilized pre-2002, and was not continuing to perform independent investigations. In addition, some employees stated that the program can not be confidential because once an issue is raised through normal channels and then taken to ECP, any investigation by the ECP results in management knowing who brought the issue to the ECP. During an interview with the Team, the Employee Concerns Manager indicated that such perceptions could be addressed through educating the licensee's staff. The education process would help site staff understand how each concern is evaluated and how an investigation plan is developed. Further, the expectations for confidentiality could be clarified by explaining to the staff that while ECP will evaluate concerns and will not release the name of the originating individual, having brought an issue up through the CAP or normal management chain may result in management assuming who raised the issue. The licensee indicated the above issues would be evaluated to identify the most appropriate actions to be taken.

Conclusions:

Improvements in ECP visibility have been made; however, some Davis-Besse staff continue to have concerns regarding independence and confidentiality remain. The perceptions regarding independence and confidentiality may limit individual's willingness to use the system and therefore limit its effectiveness.

- d. Pillar IV: Safety Conscious Work Environment Review Team
(Ability to detect and prevent retaliation)

Observations:

The majority of individuals interviewed believe they are free to raise concerns without fear of retaliation and were not aware of any retaliatory actions being taken against others for raising safety issues. There was, however, some information shared with the Team that indicated perceptions to the contrary. Some people, in various departments, indicated that they believed the re-organization was used as an opportunity to let individuals go that were considered by management to be "too vocal." Additionally, the incident investigation process that involves sending individuals home while the incident review is undertaken, is seen in some cases as retaliatory. Some individuals also perceive that the process is not consistently applied across all departments and departmental levels. This was also given as a reason for the belief that it is retaliatory.

During its review, the Team noted that a SWCE survey question related to individuals' perception of harassment, intimidation, retaliation, and discrimination (HIRD), had been changed between the October 2004 SCWE survey and the July 2005 supplemental SCWE survey. While the change was small, it had a significant impact on the information gathered and the ability to compare information from one survey to the next. Specifically, in the 2004 survey, Question #38 read, "I am aware of others who have been subjected to HIRD within the last 6 months." The July survey changed the question to read, "In the last 6 months I have observed instances of retaliation." The Team noted that the new question may assist the site in identifying specific departments where problems exist; however, by limiting the responses to those who have "observed" HIRD, individuals who believe someone has been retaliated against, but did not observe the act, are removed from the population. Perception alone, that one can be retaliated against for raising safety concerns, can negatively impact an individual's willingness to do so.

The Team noted that in one department, over a third of those responding to the July 2005 survey answered yes to Question #38. Individuals from this department also provided specific examples of actions taken by the department's management that they believed were retaliatory. The licensee is taking actions to address the issue.

Conclusion:

There was general improvement in this area; however, the Team was concerned that valuable information was lost by rewording Question # 38.

The Team noted that in one department, some individuals not only indicated they believe others were retaliated against, they indicated they observed the act. Regarding the specific examples of apparent retaliation, the NRC is concerned that these examples, if left unaddressed, have the potential to cause a chilled work environment in this department. The NRC will continue to monitor the work environment to assess the effectiveness of the licensee's actions.

e. Additional Areas Affecting Safety Culture

Observations:

Since 2002, the licensee has implemented a number of initiatives to improve communications between managers and staff at Davis-Besse. In part, the initiatives were designed to provide staff greater access to managers at all levels, provide more information on activities, provide individuals an understanding of where they fit in the organization including how their efforts contribute to the site's overall success, and provide feedback to management on the effectiveness of their initiatives. Many of the initiatives were implemented with the goal of improving the safety culture at the site.

During the focus group interviews, issues were raised regarding the effectiveness of some of the initiatives. In general, the initiatives were seen by the staff as beneficial, however, a number of issues were raised regarding their overall effectiveness. Specifically, the effectiveness of the TOP Team, 4Cs Meetings, Alignment Meetings, Meeting-less Thursdays, and sharing SCWE survey results was discussed.

The Team noted that the TOP team had not yet implemented its primary functions as outlined in its charter. Specifically, the TOP team was not providing management with feedback on the impact changes in management practices and policies was having on the staff. Most recently, the TOP team was tasked with assisting in developing presentations for the site-wide Alignment Meetings. The Alignment Meetings were designed to help individuals understand where they fit in the overall organization and how their efforts contributed to the overall success of the facility. While the TOP team may have been a logical choice, based on its diverse membership, the assignment delayed the team's implementation of its mission.

The 4Cs Meetings, Alignment Meetings, and Meeting-less Thursdays were initiatives to improve communications between management and staff, and to ensure that messages from senior management were being properly received by the staff. Feedback from the staff, while generally positive, included a number of less positive inputs. For example, those attending 4Cs meetings indicated that they were identifying issues and generating potential solutions, but that actions to implement the solutions were not getting management support. Feedback on

Alignment Meetings ranged from very useful to “completely useless.” The Meeting-less Thursday initiative expected managers to clear their schedule to allow time for staff to discuss issues with them. Feedback to the Team ranged from improvements in, to no change in manager availability. It appeared to the Team that the difference were associated with where the departments’ work was performed. If the work was primarily an in-office function, e.g., engineering, with the manager’s office in close proximity, individuals either saw an improvement or did not see a large change, as the manager was normally available. On the other hand, if the work was primarily out in the facility, e.g., maintenance or operations non-licensed individuals, then the manager being in his/her office did not make a difference because the individuals were not there to take advantage of the additional open time. The Team also noted that a senior management expectation to share and discuss the 2004 survey data with the staff, was not implemented in all departments.

Conclusions:

The licensee continues to implement a number of initiatives to improve communications between management and staff at Davis-Besse. The initiatives have been shown to be valuable tools for improving communications at the site. However, it appears that the effectiveness of the communication tools has been hampered because the intent and implementation of the tools have not been verified nor actions taken to make adjustments as necessary.

V. Exit Meeting

The Team Leader, with members of the Team joining via teleconference line, met with Mr. Mark Bezilla and members of his staff on October 19, 2005, to discuss the results of this inspection. Mr. Bezilla acknowledged the Team’s conclusions.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

FirstEnergy Personnel

| | |
|---------------|--|
| M. Bezilla | Site Vice President |
| B. Boles | Manager, Plant Engineering |
| J. Brunkhorst | Superintendent, Maintenance |
| S. Fox | Senior Project Manager, Site Projects |
| J. Grabnar | Manager, Design Engineering |
| L. Griffith | Manager, Site Human Resources |
| L. Harder | Manager, Radiation Protection |
| D. Haskins | Manager, Leadership Organizational Development |
| R. Hruby | Manager, Fleet Oversight |
| R. Jarosi | ECP Site Representative |
| G. Kendrick | Manager, Maintenance |
| P. McCloskey | Manager, Chemistry - TOP Management Sponsor |
| D. Moul | Manager, Work Management |
| K. Ostrowski | Manager, Operations |
| C. Price | Manager, Regulatory Compliance |
| A. Stallard | Supervisor, Operations Training |
| C. Steagall | Superintendent, Maintenance |
| L. Strauss | Specialist, Regulatory Compliance |
| J. Sturdavant | Senior engineer, Regulatory Compliance |
| R. Wilkins | Manager, Communications |
| D. Wuokko | Supervisor, Regulatory Compliance |

State of Ohio

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| E. Edwards | Ohio Emergency Management Agency |
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DOCUMENT REVIEWED

Tabulated results from the licensee's fall 2004 and supplemental summer 2005 SCWE surveys

Licensee's March 4, 2005, letter resubmitting its Organizational Safety Culture and Safety Conscious Work Environment Independent Assessment Report and Actions Plans for the Davis-Besse Nuclear Power Station.

Davis-Besse SCWE survey Review Team, Internal Independent Assessment Report

Oversight and Process Improvement Nuclear Quality Assessment, Safety Culture and Safety Conscious Work Environment Interviews/Survey performed October 11 through 22, 2004.

Condition Report Number 05-00724 "COIA SC 2004 Safety Culture/SCWE Assessment - Areas for Improvement"

Condition Report Number 05-01260, "Site Protection Review of Recent Surveys and Assessments"

Condition Report Number 04-07262, "Declining Safety Conscious Work Environment Survey Results Culture"

Condition Report Number 05-02201, "Tracking CR for Development of Followup Edventures Map Sessions"

LIST OF ACRONYMS USED

| | |
|--------|---|
| CA | Corrective Action |
| CAP | Corrective Action Program |
| CFR | Code of Federal Regulations |
| CR | Condition Report |
| DRP | Division of Reactor Projects |
| ECP | Employee Concerns Program |
| FENOC | FirstEnergy Operating Company |
| FW | Feedwater |
| HIRD | Harassment, Intimidation, Retaliation, Discrimination |
| NQA | Nuclear Quality Assessment |
| NRC | Nuclear Regulatory Commission |
| PI | Performance Indicator |
| SC | Safety Culture |
| SCWE | Safety Conscious Work Environment |
| SCWERT | Safety Conscious Work Environment Review Team |
| TOP | Teamwork, Ownership, and Pride |