

November 16, 2005

Mr. W. Pearce  
Acting Vice President  
FirstEnergy Nuclear Operating Company  
Perry Nuclear Power Plant  
10 Center Road, A290  
Perry, OH 44081

SUBJECT: UPCOMING PERRY NUCLEAR POWER PLANT CONFIRMATORY ACTION  
LETTER (CAL) FOLLOWUP INSPECTION - IP 95002 ACTION ITEM REVIEW

Dear Mr. Pearce:

On January 9, 2006, the NRC will begin a review of your actions to address issues related to our previous IP 95002 and IP 95003 inspection findings and observations at your Perry Nuclear Power Plant as part of our September 28, 2005, Confirmatory Action Letter followup activities.

In particular, the inspection has the following objectives: (1) Determine whether licensee corrective actions to address maintenance procedure adequacy issues are adequate, (2) Determine whether licensee corrective actions to address emergency service water (ESW) pump coupling assembly concerns are adequate, and (3) Determine whether licensee corrective actions to address training are adequate.

In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a request for documents needed for the inspection. The documents should be ready for NRC review by December 14, 2005.

If there are any questions about the material requested, or the inspection in general, please call Eric Duncan at (630) 829-9628.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public

W. Pearce

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Sincerely,

**/RA/**

Eric R. Duncan, Chief  
Branch 6  
Division of Reactor Projects

Docket No. 50-440  
License No. NPF-58

Enclosure: Request for Information Regarding  
CAL Followup Inspection - IP 95002  
Action Item Review

cc w/encl: G. Leidich, President - FENOC  
J. Hagan, Chief Operating Officer, FENOC  
D. Pace, Senior Vice President Engineering and Services, FENOC  
Director, Site Operations  
Director, Regulatory Affairs  
M. Wayland, Director, Maintenance Department  
Manager, Regulatory Compliance  
T. Lentz, Director, Performance Improvement  
J. Shaw, Director, Nuclear Engineering Department  
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Ohio State Liaison Officer  
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## **Requested Information to Support**

### **CAL Followup Inspection - IP 95002 Action Item Review**

#### Procedure Adequacy

- Commitment Item 1.a/DAMP Item B.2.2.3.1: "To date, one hundred eight (108) of the one hundred nineteen (119) procedures have been updated and issued. The remaining maintenance procedures have been updated and are currently going through the owner's review and acceptance review process."

Provide three (3) copies of a list of the revised maintenance procedures. Identify frequency in which procedure is accomplished and next two (2) scheduled performance dates, if available.

Provide three (3) copies of all work orders for any of the procedures that have been implemented after the procedures were revised.

Provide three (3) copies of the closure documentation associated with the subject Commitment/DAMP Item, including corrective action program closure documentation, if available.

- Commitment Item 1.b/DAMP Item B.2.2.3.2: "CA 05-03655-01 is to revise Nuclear Quality Assurance Instruction NQI-1001, 'QC Inspection Program Control,' to specify a method by which classification can be established for additional inspection attention items that have experienced repeat failures. This method will include consideration of failure analysis, the risk-significance of the item, and the probability of failure occurrence in determining the extent of inspection activity."

Provide three (3) copies of the revised NQI-1001, "QC Inspection Program Control," as well as three (3) copies of the previous (original) procedure revision.

Provide three (3) copies of the closure documentation associated with the subject Commitment/DAMP Item, including corrective action program closure documentation, if available.

#### ESW Pump Coupling Assembly Concerns

- Commitment Item 1.c/DAMP Item B.2.2.3.3: "CA 05-03655-03 is to revise Generic Mechanical Instruction (GMI)-0039, 'Disassemble/Re-assembly of Divisions I and II Emergency Service Water Pumps,' and GMI-040, 'Disassembly/Re-assembly of Division III Emergency Service Water Pump,' to include QC inspection points for work activities associated with pump shaft couplings, as specified by QC."

Provide three (3) copies of the revised GMI-0039 and GMI-0040 procedures as well as three (3) copies of the original procedure revision. Provide revision sheets which identify the specific changes accomplished.

Provide three (3) copies of the closure documentation associated with the subject Commitment/DAMP Item, including corrective action program closure documentation, if available.

- DAMP Item B.2.2.5: "Based on the results of the maintenance procedure upgrade plan for key critical components, develop a long term Maintenance Procedure Upgrade Plan and incorporate actions into the FENOC Business Plan (05-04586-01)."

Provide three (3) copies of the subject Maintenance Procedure Upgrade Plan and FENOC Business Plan.

Provide three (3) copies of the closure documentation associated with the subject Commitment/DAMP Item, including corrective action program closure documentation, if available.

#### Training

- Review the corrective action of "...development of proper planning for work management to ensure strict compliance of job planning to eliminate misdirection during conduct of the job," described in Perry letter PY-CEI/NRR-2897L dated August 17, 2005.

Provide three (3) copies of the revised job planning procedures, if applicable.

Provide three (3) copies of the closure documentation associated with the subject corrective action, including corrective action program closure documentation, if available.

- Review the corrective action of "...plant manager to discuss 'push back' in the daily plant updates. This discussion will promote a challenging attitude from the employees," described in Perry letter PY-CEI/NRR-2897L dated August 17, 2005.

Provide three (3) copies of the "lesson plan" used to conduct the subject training.

Provide three (3) copies of available records, such as attendance sheets, which identify the individuals who attended the subject training and when the training was attended.

Provide three (3) copies of the closure documentation associated with the subject corrective action, including corrective action program closure documentation, if available.

- Review the corrective action of "...new human performance tools have been rolled out which reinforce use of human performance during stressful times. These tools are discussed in the following human performance procedures: (1) NOBP-LP-2601, 'Human Performance Program'; (2) NOBP-LP-2603, 'Human Performance Tools and Verification Practices'; (3) NOBP-LP-2604, 'Job Briefs'; and (4) NOP-LP-2601, 'Procedure Use and Adherence.'"

Provide three (3) copies of human performance procedures NOBP-LP-2601, NOBP-LP-2603, and NOP-LP-2601

Provide a listing of plant personnel in the maintenance and operations departments.