



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
10 Center Road
P.O. Box 97
Perry, Ohio 44081

January 30, 2006
PY-CEI/OIE-0662L

Mr. James L. Caldwell
Regional Administrator, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

Perry Nuclear Power Plant
Docket No. 50-440
License No. NPF-58

Dear Mr. Caldwell,

In your letter dated September 28, 2005 which transmitted the Confirmatory Action Letter, you requested First Energy Nuclear Operating Company provide quarterly updates for any completed commitments. This letter provides the requested update for the fourth quarter of 2005. FENOC has completed six (6) commitments that were scheduled for completion in the fourth quarter 2005. The completed commitments are in the areas of Corrective Action Program Implementation Improvement, Excellence in Human Performance, and Emergency Preparedness. The attached table depicts those commitment items completed to date.

During the December 14, 2005 public meeting, FENOC management stated that the training of additional personnel for the Emergency Response Organization was completed. Subsequently, we self-identified that this statement was in error and the issue was entered into the corrective action program. NRC Region III management was notified on 12/16/05 of the error to ensure an accurate depiction of the commitment's status. There is no significant implication for public health and safety or common defense and security with regard to this error. The training was completed and the commitment was met by December 31, 2005.

Also, during the December 14, 2005 public meeting, the subject of additional Emergency Response Organization drills was discussed. Although Perry has completed the commitment for additional Emergency Response Organization drills, we recognize that there is still room for improvement. We intend to conduct additional drills during the first half of 2006.

There are no additional commitments contained in this letter. We will continue to update you on our progress on a quarterly basis per your request. If you have any have questions or require additional information, please contact Mr. Jeffrey Lausberg, Manager, Regulatory Compliance at (440) 280-5940.

Very truly yours,

Frederick van Allen FOR L W PEARCE
Attachment

cc: NRC Document Control Desk
NRC Project Manager
NRC Resident Inspector

PNPP Commitments

Attachment
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ITEMS	DESCRIPTION	QUARTER DUE	STATUS
1.0	IP 95002 Inspection Follow-up Issues		
1.a	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.	Third 2005	Complete
1.b	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.	Third 2005	Complete
1.c	CA 05-03655-03 is to revise Generic Mechanical Instructions (GMI)-0039, "Disassembly/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.	Third 2005	Complete
2.0	Corrective Action Program Implementation Improvement		
2.a	Develop expectations necessary for successful implementation of the corrective action program (CAP). Train the site to the expectations and accountability methods that will be used to improve implementation of the CAP.	Fourth 2005	Complete
2.b	Implement management controls to improve line ownership and accountability at the individual level for successful implementation of the CAP.	Third 2005	Complete
2.c	Establish a management review process that routinely monitors the site's and section level CAP performance. Take action to improve performance when expectations are not met and hold the organization accountable for overall CAP effectiveness.	Third 2005	Complete
2.d	Perform a self-assessment that evaluates the overall health of the CAP, including an aggregate assessment of key performance indicator trends. Assess whether substantial progress has been made in CAP performance.	Fourth 2006	Ongoing
3.0	Excellence in Human Performance		
3.a	Roles and responsibilities of the Site Leadership Team in implementing the human performance program will be defined and communicated.	Fourth 2005	Complete
3.b	Approximately monthly Site Training Advisory Committee and department / section Training Review Committee meetings have been held and will continue to be conducted with a strong focus on human performance through fourth quarter 2005.	Fourth 2005	Complete
3.c	The purpose and key activities of the Human Performance Program will be communicated to Perry Nuclear Power Plant (PNPP) personnel.	Fourth 2005	Complete
3.d	Group-specific needs analyses will be performed by training committees to determine the scope and content of initial and continuing training needs on human performance fundamentals and error prevention tools and training will be provided.	First 2006	Ongoing
4.0	Emergency Preparedness		
4.a	FENOC is expanding the population of qualified EP responders by approximately 125 persons to increase the depth of the emergency response organization.	Fourth 2005	Complete
4.b	Additional drills will be conducted to demonstrate appropriate Emergency Response Organization response times.	Fourth 2005	Complete