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Fax: 419-321-7582Docket Number 50-346  
License Number NPF-3  
Serial Number 1-1452

February 27, 2006

Mr. James L. Caldwell  
Regional Administrator, Region III  
U. S. Nuclear Regulatory Commission  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352Subject: Revision of 2004 Engineering Program Effectiveness  
Areas for Improvement Action Plans

Dear Mr. Caldwell:

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," requires the FirstEnergy Nuclear Operating Company (FENOC) to contract with independent outside organizations to conduct comprehensive assessments, one of which is engineering program effectiveness.

In accordance with the Confirmatory Order, an independent assessment of engineering program effectiveness at the Davis-Besse Nuclear Power Station (DBNPS) was conducted from October 11 to October 22, 2004. The assessment results and the DBNPS-proposed action plans to address Areas for Improvement (AFI) were submitted to the NRC under letter Serial Number 1-1394, dated December 6, 2004.

This letter provides a revision to the AFI action plans regarding two actions. Specifically, the DBNPS is removing the following two actions:

1. The long term solution to the current less than adequate tracking of engineering change status between issuance to the field and return to engineering for closure will be addressed through the inclusion of engineering changes into SAP. This will provide a common platform for managing the design as well as the implementation stages of engineering changes and provide improved monitoring of the engineering change process. This change will be completed by the fourth quarter of 2005. (AFI COIA-DB 1.2.2)
2. A future revision of NOP-CC-2003, Engineering Changes, will include a common engineering change close-out process. This revision is currently in progress through the fleet engineering programs manager and is expected to be issued by the end of the fourth quarter 2005. (AFI COIA-DB 1.2.4)

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These two actions are part of an action plan in response to the following AFI identified by the assessment team:

AFI DB 1.2 – Modification Tracking and Closure

Initiation and closeout of documentation associated with plant modifications are untimely and inefficient.

Both actions rely on a Fleet-approach of tracking modifications through the SAP process. However, the SAP process, which is an aspect of the Fleet business plan, is currently not in place to support the completion of these two actions. The specific issue is the timely closure of the backlog of projects/modifications. This has been managed without utilizing the SAP process; and therefore, these two enhancement actions can be eliminated.

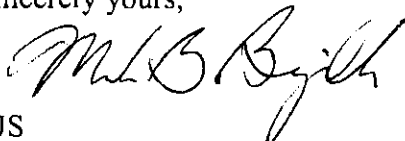
The intent of these two actions has been met as demonstrated by the results of the 2005 Independent Assessment – Engineering Programs Effectiveness, which reviewed corrective actions taken to address 2004 Independent Assessment AFIs. Section 1.5.2.1, Modifications, of the Assessment Team's final report states:

The finding from the 2004 COIA was addressed, the backlog of open modifications is decreasing, and the design department continues to produce quality modifications. . . The engineering change process has improved since the 2004 assessment . . . This reduction is a result of more timely modification closeout and the voiding of modifications or modification requests that are no longer needed.

This revision was discussed with Ms Christine Lipa, NRC Region III Chief, Branch 4, Division of Reactor Projects, and Mr. C. Scott Thomas, NRC Davis-Besse Senior Resident Inspector, on December 23, 2005. Attached are revised pages to the action plans previously submitted under letter Serial Number 1-1394, dated December 6, 2004.

If you have any questions or require further information, please contact Mr. Clark A. Price, Manager – Regulatory Compliance, at (419) 321- 8585.

Sincerely yours,

  
LJS

Attachments

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cc: USNRC Document Control Desk  
C.A. Lipa, Branch Chief, Region III  
DB-1 NRC/NRR Project Manager  
DB-1 Senior Resident Inspector  
Utility Radiological Safety Board

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### COMMITMENT LIST

The following list identifies those actions committed to by FENOC's Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions by the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Manager - Regulatory Compliance (419-321-8585) at the DBNPS of any questions regarding this document or associated regulatory commitments.

#### COMMITMENTS

#### DUE DATE

None. Serial No. 1-1452 contains no new commitments. N/A

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Attachment 2

Revised Pages to the  
2004 Engineering Program Effectiveness  
Areas for Improvement Action Plans  
(2 pages follow)

## **SECTION 2**

### **Action Plans for Identified Areas for Improvement**

The Areas For Improvement (AFI) Action Plans contained in this section were developed by the Davis-Besse Nuclear Power Station (DBNPS) in response to the AFIs identified in Section 1 by the Independent Assessment team.

The Confirmatory Order assessment provided an independent and comprehensive review of Engineering Programs at the Davis-Besse Nuclear Power Station. The assessment team identified three "Areas for Improvement" (AFI). These AFIs have been entered in the Corrective Action Program. The AFIs and the associated Action Plans are presented in this Section. In addition to the AFIs, there were several "Noteworthy Items" documented by the assessment team. These Noteworthy Items have been captured in the Corrective Action Program.

### **AFI COIA-DB 1.2 – Modification Tracking and Closure**

***Initiation and closeout of documentation associated with plant modifications are untimely and inefficient.***

Action plan:

1. Classify the approximately 550 identified unclassified proposed engineering change requests by the end of Cycle 14. Progress will be monitored utilizing the status of open engineering changes monthly through the monthly Performance Report and quarterly through the Design Basis Assessment Report (DBAR).
2. Deleted.
3. The planning organization has placed additional focus on processing through for closure the engineering changes that are essentially field complete. The actual status of the approximately 57 identified engineering changes requiring closeout will be confirmed and dispositioned properly by the end of the second quarter 2005. In the interim, Operations will re-review these open engineering changes to ensure no adverse impact to safe plant operations by

February 28, 2005. The total number of engineering changes issued for implementation will be monitored monthly through performance indicators included in the Monthly Performance Report.

4. Deleted

### **AFI COIA-DB 2.2 - Calculation Improvement Program**

*Calculation Improvement Program is not receiving sufficient management focus to ensure timely completion*

**Action Plan:**

1. The Calculation Improvement Plan is updated on a quarterly basis through the Design Basis Assessment Report (DBAR). Several enhancements to the DBAR will be made, these changes include:
  - a) Improve the DBAR report content to include an overall trend and summary to focus management attention to problem areas. This report content change will be made in the 1<sup>st</sup> quarter 2005 DBAR.
  - b) The current status of the calculation improvement plan will be reviewed against the recent level of calculation quality. Due dates will be reconfirmed and rebaselined and adjustments will be made as necessary and the plan will be updated in the 1<sup>st</sup> quarter 2005 DBAR.

### **AFI COIA-DB 6.2 Utilization Of The Self Assessment Process**

*The Self-Assessment Process is not being fully utilized to improve Engineering Performance.*

**Action Plan:**

1. FENOC Fleet ownership for Self-assessments has been established.
2. Engineering efforts will be focused to better utilize the Self-Assessment process in regards to planning and completion of self-assessments. The 2005 Self-assessment focus areas and owners have been identified and