March 31, 2000

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

## SUBJECT: PLANT PERFORMANCE REVIEW - DAVIS-BESSE

Dear Mr. Campbell:

The purpose of this letter is to communicate our assessment of your performance and to inform you of our planned inspections at your facility. On March 7, 2000, we completed a Plant Performance Review (PPR) of the Davis-Besse Nuclear Power Station. We conduct these reviews to develop an integrated overview of the safety performance of each operating nuclear power plant. We use the results of the PPR in planning and allocating inspection resources and as inputs to our senior management meeting (SMM) process. This PPR evaluated inspection results and safety performance information for the period from February 1, 1999, through January 31, 2000, but emphasized the last 6 months to ensure that our assessment reflected your current performance. Our most recent summary of plant performance at Davis-Besse was provided to you in a letter dated March 26, 1999, and was discussed with you in a public meeting on June 8, 1999.

The NRC has been developing a revised reactor oversight process that will replace our existing inspection and assessment processes, including the PPR, the SMM, and the Systematic Assessment of Licensee Performance (SALP). We recently completed a pilot program for the revised reactor oversight process at nine participating sites and are making necessary adjustments based on feedback and lessons learned. We plan to begin initial implementation of the revised reactor oversight process industry-wide, including your facility, on April 2, 2000.

This PPR reflects continued process improvements as we make the transition into the revised reactor oversight process. You will notice that the following summary of plant performance is organized differently from our previous performance summaries. Instead of characterizing our assessment results by SALP functional area, we are organizing the results into the strategic performance areas embodied in the revised reactor oversight process. In addition, we have considered the historical performance indicator data that you submitted in January 2000 in conjunction with the inspection results in assessing your performance. The results of this PPR were used to establish the inspection plan in accordance with the new risk-informed inspection program (consisting of baseline and supplemental inspections). Although this letter incorporates some terms and concepts associated with the new oversight process, it does not reflect the much broader changes in inspection and assessment that will be evident after we have fully implemented our revised reactor oversight process.

During the past 6 months, Davis-Besse was typically operated at or near full power with only a few minor challenges to plant operators. Effective actions were taken to address the decline in operational performance which occurred during the previous assessment period. A planned mid-cycle maintenance outage took place from April 24 to May 11, and a planned downpower to 10 percent occurred on October 22-25 to fix a main generator bushing seal leak. Other brief, small power reductions were made once each month for turbine valve testing. Although the NRC noted some performance issues during this assessment period, we note that Davis-Besse continues to operate in a safe manner. In an effort to ensure these issues are addressed, additional inspection resources will be allocated in certain areas as noted in this letter and the attached inspection plan.

In the reactor safety strategic area, no significant inspection findings were identified. The safety system functional failure performance indicator was white in the first quarter of 1999 due to a component cooling water system pump failure and a special inspection was conducted to review this issue. The emergency drill performance indicator was white due to the failure to meet the 15 minute reporting rule for all drill, exercise, and actual event opportunities at least 90 percent of the time. In order to ensure the issues associated with timely and accurate performance of drill, exercise, and actual event opportunities are addressed, a supplemental inspection will be conducted in addition to the baseline inspection program in this area.

We did not identify any significant performance issues in the radiation safety and safeguards strategic performance areas. As a result, only baseline inspections are planned in these strategic areas.

Enclosure 1 contains a historical listing of plant issues, referred to as the Plant Issues Matrix (PIM), that were used during this PPR process to arrive at our integrated view of your performance trends. The PIM for this assessment is grouped by the prior SALP functional areas of operations, maintenance, engineering and plant support, although the future PIM will be organized along the cornerstones of safety as described in the revised reactor oversight process. The attached PIM includes items summarized from inspection reports or other docketed correspondence regarding the Davis-Besse plant. We did not document all aspects of your programs and performance that may be functioning appropriately. Rather, we only documented issues that we believe warrant management attention or represent noteworthy aspects of performance. In addition, the PPR may also have considered some predecisional and draft material that does not appear in the attached PIM, including observations from events and inspections that had occurred since our last inspection report was issued, but had not yet received full review and consideration. We will make this material publically available as part of the normal issuance of our inspection reports and other correspondence.

Enclosure 2 lists our planned inspections for the period April 2, 2000 through March 31, 2001, to allow you to resolve scheduling conflicts and personnel availability in advance of our inspector arrival on site. The inspection schedule for the latter half of the period is more tentative and may be adjusted in the future due to emerging performance issues at Davis-Besse or other Region III facilities. Routine resident inspections are not listed due to their ongoing and continuous nature.

G. Campbell

We will inform you of any changes to the inspection plan. If you have any questions, please contact me at 630/829-9866.

Sincerely,

## /**RA**/

Thomas J. Kozak, Chief Reactor Projects Branch 4 Division of Reactor Projects

Docket Nos. 50-346 License Nos. NPF-3

- Enclosures: 1. Plant Issues Matrix
  - 2. Inspection Plan
- cc w/encls:

B. Saunders, President - FENOC J. Lash, Plant Manager J. Freels, Manager, Regulatory Affairs M. O'Reilly, FirstEnergy State Liaison Officer, State of Ohio R. Owen, Ohio Department of Health C. Glazer, Chairman, Ohio Public **Utilities Commission** C. Emahiser, Ottawa County Sheriff J. P. Greer, Director, Emergency Management Agency S. Isenberg, President, Lucas County Board of Commissioners J. Telb, Lucas County Sheriff B. Halsey, Director, Emergency Management Agency G. Adams, Village Administrator, Genoa The Honorable Robert Purney The Honorable Lowell C. Krumnow The Honorable Robert Skilliter, Jr. The Honorable Peter Macko The Honorable Carleton Finkbeiner The Honorable Thomas Brown C. Koebel, President, Ottawa County **Board of Commissioners** The Honorable Kathleen K. Dziak INPO

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  - J. Lash, Plant Manager
  - J. Freels, Manager, Regulatory Affairs
  - M. O'Reilly, FirstEnergy
  - State Liaison Officer, State of Ohio
  - R. Owen, Ohio Department of Health
  - C. Glazer, Chairman, Ohio Public
  - **Utilities Commission**
  - C. Emahiser, Ottawa County Sheriff
  - J. P. Greer, Director, Emergency Management Agency
  - S. Isenberg, President, Lucas County Board of Commissioners
  - J. Telb, Lucas County Sheriff
  - B. Halsey, Director, Emergency
  - Management Agency
  - G. Adams, Village Administrator, Genoa
  - The Honorable Robert Purney
  - The Honorable Lowell C. Krumnow
  - The Honorable Robert Skilliter, Jr.
  - The Honorable Peter Macko
  - The Honorable Carleton Finkbeiner
  - The Honorable Thomas Brown
  - C. Koebel, President, Ottawa County

Board of Commissioners The Honorable Kathleen K. Dziak

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