October 13, 2000

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

SUBJECT: DAVIS-BESSE - NRC INSPECTION REPORT 50-346/2000013(DRS)

Dear Mr. Campbell:

On September 22, 2000, the NRC completed a routine baseline inspection at your Davis-Besse Nuclear Power Station. The enclosed report presents the results of that inspection. The results of this inspection were discussed with Mr. H. Bergendahl and other members of your staff on September 22, 2000.

The inspection was an examination of activities conducted under your license as they relate to the Safeguards Strategic Performance Area and compliance with the Commission's rules and regulations and with the conditions of your license. Within this area, the inspection consisted of a selected examination of procedures and representative records, observation of activities, and interviews with personnel. Specifically, this inspection focused on performance involving your access control and access authorization programs, and plant protection performance indicators.

Based on the results of this inspection, it was determined that the programs examined met NRC requirements.

In accordance with 10 CFR 2.790 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 Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,

/RA/

James R. Creed
Safeguards Program Manager
Division of Reactor Safety

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

Enclosure: Inspection Report 50-346/2000013(DRS);

See Attached Distribution

cc w/encl: B. Saunders, President - FENOC
H. Bergendahl, Plant Manager
D. Lockwood, Manager, Regulatory Affairs
M. O'Reilly, FirstEnergy
State Liaison Officer, State of Ohio
R. Owen, Ohio Department of Health
A. Schriber, Chairman, Ohio Public
Utilities Commission

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Sincerely,
/RA/
James R. Creed
Safeguards Program Manager
Division of Reactor Safety

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

Enclosure: Inspection Report 50-3462000013(DRS);

See Attached Distribution

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DATE	10/12/00		10/12/00		10/13/00					

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cc w/encl: B. Saunders, President - FENOC
H. Bergendahl, Plant Manager
D. Lockwood, Manager, Regulatory Affairs
M. O'Reilly, FirstEnergy
State Liaison Officer, State of Ohio
R. Owen, Ohio Department of Health
A. Schriber, Chairman, Ohio Public
Utilities Commission

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DRSIII
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-346
License No:	NPF-3
Report No:	50-346/2000013(DRS)
Licensee:	FirstEnergy Nuclear Operating Company
Facility:	Davis-Besse Nuclear Power Station
Location:	5501 North State Route 2 Oak Harbor, OH 43449-9760
Dates:	September 18 - 22, 2000
Inspector:	Gary Pirtle, Physical Security Inspector
Approved by:	James R. Creed, Safeguards Program Manager Division of Reactor Safety

NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas) reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
● Initiating Events	● Occupational	● Physical Protection
● Mitigating Systems	● Public	
● Barrier Integrity		
● Emergency Preparedness		

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

SUMMARY OF FINDINGS

IR 50-346/2000013(DRS); on 09/18-22/2000; FirstEnergy Nuclear Operating Company, Davis-Besse Nuclear Power Station, Unit 1, Security Specialist Report. This inspection was conducted by a regional security specialist.

Cornerstone: Physical Protection

The Access Authorization and Access Control programs met NRC requirements.

Report Details

1. REACTOR SAFETY

Cornerstone: Physical Protection

1PP1 Access Authorization (AA) Program (IP 71130.01)

a. Inspection Scope

The inspector interviewed five licensee supervisors and five non-supervisors employees to determine their knowledge of fitness-for-duty and behavior observation responsibilities. Procedures pertaining to the Behavior Observation Program and Fitness-for-Duty semi-annual test result reports were also reviewed. The inspector reviewed a sample of licensee self-assessments, audits, and security logged events. In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

No findings were identified.

1PP2 Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorization) (IP 71130.02)

a. Inspection Scope

The inspector reviewed testing and maintenance procedures, observed licensee testing activities, and interviewed and monitored security personnel regarding the staffing and operational requirements for protected area search equipment, to include explosive detectors, metal detectors, and X-ray machines. The inspector also conducted random observations and interviewed selected security personnel responsible for access control measures for packages that entered the protected area. The inspector reviewed a sample of licensee self-assessments, audits, maintenance request records, and security logged events for identification and resolution of problems. In addition, the inspector interviewed security managers to evaluate their knowledge and use of the licensee's corrective action system.

b. Findings

Some special purpose search equipment test procedures were not adequate to identify all potential equipment malfunctions. The test procedure for explosive detectors did not identify adequate pass/fail criteria because the procedure did not include the requirement that the alarm from the test source be received prior to the detector exit light activating. Additionally, the "slide test" procedure for the X-ray machine did not identify adequate pass/fail criteria (Section 8.4 of procedure IS-DP-04003) because the criteria did not address the conditions that resulted from the tests conducted. The appropriate procedures were revised and implemented prior to the close of the

inspection. Explosive detectors, metal detectors and X-ray machines observed during the testing process performed as designed.

An unresolved item pertaining to access to vital areas was identified. 10 CFR 73.55(d)(7) requires access to vital areas to be limited to personnel who need access to the areas to perform non-emergency duties. Section 1.6.1.1 of the Davis-Besse security plan states the level of access granted is determined by assigned responsibilities. A nine month card history was run for six randomly selected persons and a comparison was made to the vital areas authorized and entry into those areas for the nine month period. This review showed that in all cases personnel had been granted access to one or more vital areas that they had not entered within the past nine months. One of the selected individuals had not entered eight vital areas granted unescorted access to since November 1999. The Quality Assurance Department noted the same issue during one of their reviews and identified a finding in their report (Condition Report No. 2000-2221). The unresolved item is: if frequency of access to a vital area needs to be considered when determining work-related need for vital area access, particularly since a program existed for granting temporary access as needed (50-346/2000013-01). Resolution of this issue will be addressed by separate correspondence.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (IP71151)

a. Inspection Scope

The inspector verified the data for the Physical Protection Performance Indicators (PI) pertaining to Fitness-For-Duty Personnel Reliability, Personnel Screening Program, and Protected Area Security Equipment. Specifically, a sample of plant reports related to security events, fitness-for-duty reports, and other applicable security records were reviewed for the period between January and June 2000.

b. Findings

No findings were identified.

4OA5 Other

.1 Temporary Instruction 2515/144, "Performance Indicator Data Collecting and Reporting Process"

a. Inspection Scope

The inspector reviewed the performance indicator data collecting and reporting process for the "Fitness-For-Duty/Personnel Reliability," "Personnel Screening Program," and "Protected Area Security Equipment" performance indicators. The review included data collecting and reporting process, definition of terms, calculation method, and consistency with industry guidance document NEI-99-02, Revision 0. The station prepared a procedure entitled "NRC Performance Indicator Guideline" which was

effective March 3, 2000. This procedure addressed responsibilities and instructions pertaining to the NRC Performance Indicators.

b. Findings

During review of the plant procedure for performance indicator (PI) collecting and reporting, three errors were identified as described below, which could have resulted in incorrect PI data if the errors within the procedure were followed. The personal knowledge of reporting requirements of the security staff members preparing and verifying the PI data inputs compensated for the errors. The issue was entered into the licensee's corrective action program (Condition Report No. 2000-2302).

Table 2 of the procedure identified an incorrect threshold for increased regulatory response for the Protected Area Security Equipment performance indicator. The security equipment performance however was within the green band.

Attachment 1 (Performance Indicator Data Input Sheet) to the licensee's procedure for the Physical Protection Cornerstones specified one hour reports for both 10 CFR 73.56 and 10 CFR Part 26 events as the source of data for the Personnel Screening and Fitness-For-Duty performance indicators. Neither referenced section addresses one hour reporting to the NRC. The errors did not cause FFD or Personnel Screening PI index values to be outside of the green response band because no reportable events had occurred during the period of review.

4OA6 Management Meeting

Exit Meeting Summary

The inspector presented the inspection results to Mr. H. Bergendahl, and other members of licensee management at the conclusion of the onsite inspection on September 22, 2000. The licensee representatives acknowledged the findings presented and did not identify any information discussed as proprietary or safeguards information.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

H. Bergendahl, Plant Manager
M. Bentley, Manager, Work Control
S. Coakley, Outage Manager, Work Management
L. Harder, Supervisor, Access Control
D. Lockwood, Manager, Regulatory Affairs
J. Michaelis, Manager, Supply Chain
D. Miller, Supervisor Compliance
C. Mincheff, Supervisor, Security Shift
S. Moffitt, Director, Technical Services
W. Mugge, Training Manager
A. Schumaker, Supervisor, Security Support
G. Skeel, Manager, Security
M. Stevens, Maintenance Manager
H. Stevens, Manager, Quality Assurance
J. Vetter, Supervisor, Quality Assurance
L. Worley, Director, Support Services

NRC

D. Simpkins, Resident Inspector, NRC Region III

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-346/2000013-01	URI	Unescorted Access For Vital Areas

Closed

None

Discussed

None

PARTIAL LIST OF DOCUMENTS REVIEWED

The following is a list of licensee documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort.

Security Event Logs - January - August 2000
Toledo Edison Security Department Procedure IS-DP-04005, "Operational Test for Walk-Through Explosive Detector,", Revision 5, approved March 10, 1997
Toledo Edison Security Department Procedure IS-DP-04001, "Operational Test for the Walk-Through Metal Detector," Revision 2, approved September 30, 1996
Toledo Edison Security Department Procedure IS-DP-04002, "Performance Test for the Walk Through Metal Detector," Revision 3, approved September 30, 1996
Toledo Edison Security Department Procedure IS-DP-04003, "Performance Test for the X-Ray Device," Revision 3, approved September 30, 1996
Toledo Edison Security Implementing Procedure IS-DP-00506, "Lock and Key Procedure," Revision 4, approved December 18, 1997
Toledo Edison Security Implementing Procedure IS-DP-00504, "Personnel Control for Protected/Vital Areas," Revision 9, approved May 4, 2000
Toledo Edison Security Implementing Procedure IS-AC-00516, "Unescorted Access Requirements," Revision 9, approved January 30, 1998
Toledo Edison Nuclear Group Procedure NG-IS-00004, "Fitness For Duty Program," Revision 6, approved November 12, 1997
Card Reader History Reports For Six Randomly Selected Personnel for a Nine Month Period (November 1999 through August 2000)
Fitness-For-Duty Training Completion Listing for Six Randomly Selected Supervisors
Evaluation/Fitness-For-Duty Program Performance Data Six Months Reports, dated January 28, 2000 and August 3, 2000.
Listing of Security-Related Condition Report between January and August 2000
Condition Report No. 2000-0276 Pertaining to Protected Area Access, dated March 16, 2000
Condition Report No. 2000-2221 Pertaining to Access to Protected and Vital Areas, dated September 13, 2000
Condition Report No. 2000-2302 Pertaining to NRC Performance Indicator Guideline, dated September 21, 2000