

Mark B. Bezilla  
Vice President, Nuclear

419-321-7676

December 26, 2018

L-18-246

Kenneth O'Brien  
Director, Division of Reactor Safety  
U.S. Nuclear Regulatory Commission Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352**SUBJECT:**Davis-Besse Nuclear Power Station, Unit 1  
Docket Number 50-346, License Number NPF-3  
Notification of Completion of Actions for Confirmatory Order EA-16-022

On September 1, 2016, the NRC issued a Confirmatory Order to the FirstEnergy Nuclear Operating Company (FENOC) modifying the Davis-Besse Nuclear Power Station (DBNPS) license. This Confirmatory Order was the result of an agreement reached during an alternative dispute resolution (ADR) mediation session conducted on July 21, 2016. On March 1, 2017, FENOC provided written notification to the NRC of the completion of actions taken under Items 1, 2, 3, 6, 7, and 8 of Section V of the Confirmatory Order to fulfill Action 9 of the order, reference Letter L-17-060. Per Section V.10 of the Confirmatory Order, FENOC is also required to provide written notification of the completion of actions taken under Items 4 and 5 of Section V of the Confirmatory Order no later than December 31, 2018. These actions are complete as detailed in the attachment to this letter.

There are no new regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Patrick J. McCloskey, Manager, Site Regulatory Compliance, at (419) 321-7274.

Sincerely,



Mark B. Bezilla

GMW

Attachment: Completion of Actions for Confirmatory Order EA-16-022

RECEIVED DEC 27 2018

Davis-Besse Nuclear Power Station, Unit 1  
L-18-246  
Page 2 of 2

cc: NRC Document Control Desk  
DB-1 Senior Resident Inspector

Attachment  
L-18-246

Davis-Besse Nuclear Power Station (DBNPS)  
Completion of Actions for Confirmatory Order EA-16-022

Page 1 of 3

The following actions as documented in the Section V of the Confirmatory Order issued September 1, 2016, with an effective date of 30 calendar days after issuance (October 1, 2016) to the FirstEnergy Nuclear Operating Company (FENOC) have been completed as shown below:

- 4. No later than December 31, 2017, FENOC will revise and administer fleetwide plant access training. The revised training shall address the provisions of 10 CFR 50.9 and incorporate facts and lessons learned from the event that gave rise to the Confirmatory Order.**

Due to industry changes in the process for administering plant access training that occurred after the Confirmatory Order Actions were agreed upon, a separate training module was developed to address this Action. The training module reinforced the expectations to comply with 10 CFR 50.9, Completeness and Accuracy of Information and reviewed the lessons learned from the event involving a FENOC licensed Reactor Operator that was found not to be taking medications as required by his NRC license. All personnel on a FENOC site as of December 1, 2017, completed this training.

During development of this notification of completion of actions letter (L-18-246) in December 2018, it was identified the training module regarding the expectations to comply with 10 CFR 50.9 was not established as a continuing action as intended, and therefore personnel badged after December 2017 did not receive the training. Additionally, it was identified that some support groups such as Human Resources, Supply Chain, and Document Control with FENOC protected area badges were not assigned the training module in 2017. This issue was entered into the FENOC Corrective Action Program, the training module was made as a continuing training item, and the subject population of badged personnel have completed the training as of the date of this letter.

- 5. Upon completion of actions taken under items 1, 2, 3, and 4, but in no event later than two years from the effective date of the Confirmatory Order, FENOC shall complete an effectiveness review of those actions.**

A review of the effectiveness of Confirmatory Order actions 1, 2, 3, and 4 was performed. A sampling of individuals applicable to each item was performed, with the intended focus to determine if individuals understood their requirement to report changes in status of medical conditions, and the requirements of 10 CFR 50.9 to be complete and accurate with information provided to the Nuclear Regulatory Commission. The four Confirmatory Order actions were as follows (refer to the Confirmatory Order for due dates of these actions):

1. Davis-Besse operations management will complete discussions with each licensed operator regarding the facts and lessons learned from the event that gave rise to the Confirmatory Order.
2. FENOC will revise [Davis-Besse] operator requalification training materials to incorporate facts and lessons learned from the event that gave rise to the Confirmatory Order.
3. Appropriate FENOC management will communicate expectations and requirements for complete and accurate medical reporting to operations and security personnel subject to those requirements.
4. FENOC will revise and administer fleetwide plant access training. The revised training shall address the provisions of 10 CFR 50.9 and incorporate facts and lessons learned from the event that gave rise to the Confirmatory Order.

For the effectiveness of actions 1 and 2, a sampling of Davis-Besse licensed and non-licensed operators was selected from the five operating crews as well as off-shift staff. All operators interviewed were aware of the issue from over two years ago that gave rise to the Confirmatory Order and knew of their requirement to report changes in medical status. They also knew of the requirements of 10 CFR 50.9 to provide complete and accurate information to the Nuclear Regulatory Commission.

For the effectiveness of action 3, a sampling of licensed and non-licensed operators from the Beaver Valley Power Station (BVPS) and Perry Nuclear Power Plant (PNPP) were interviewed. While personnel from the other FENOC stations did not have specific recollection of the 2016 event, all personnel interviewed were aware of their requirements to report changes in medical status and the need to be complete and accurate when providing information to the Nuclear Regulatory Commission. A sampling of Security personnel from all three FENOC stations were also interviewed, and all were aware of the requirement to report changes in medical status. One individual out of the 43 Security personnel interviewed was not sure that the requirements of 10 CFR 50.9 for completeness and accuracy of information would apply to medical reporting, which was assessed and corrected as an individual issue. All other Security personnel interviewed knew of the requirement to be complete and accurate regarding any changes to their medical status.

For the effectiveness of action 4, a sampling of personnel outside of Operations and Security departments were interviewed. While these personnel do not have a requirement to report changes in medical status as is required by Operators and Security personnel, the individuals interviewed were all aware of the requirements of 10 CFR 50.9 for completeness and accuracy of information, including information provided for medical physicals that may be required for other duties such as a crane operator or use of a respirator.

Attachment  
L-18-246  
Page 3 of 3

Based upon the satisfactory responses received during the interviews of selected licensed and non-licensed operators, security personnel, and other personnel at all three FENOC sites, the actions taken in response to Confirmatory Order items 1 through 4 were effective. In conjunction with the actions previously documented by FENOC in letter L-17-060 dated March 1, 2017, all actions required by Confirmatory Order EA-16-022 issued September 1, 2016 are complete.