

**UTILITY RADIOLOGICAL SAFETY BOARD OF OHIO  
MEETING MINUTES  
JULY 11, 2011**

Ms. Nancy Dragani, Ohio Emergency Management Agency, called to order the July 11, 2011 meeting of the Utility Radiological Safety Board of Ohio at 1:32 p.m.

The first order of business from the agenda was the roll call taken by the URSB Secretary, Tess Pelfrey.

**I. ROLL CALL**

EMERGENCY MANAGEMENT AGENCY  
DEPARTMENT OF HEALTH  
DEPARTMENT OF AGRICULTURE  
PUBLIC UTILITIES COMMISSION  
ENVIRONMENTAL PROTECTION AGENCY  
DEPARTMENT OF COMMERCE

MS. NANCY DRAGANI  
MR. MICHAEL SNEE  
MR. CHUCK KIRCHNER  
MR. DAN FISHER  
MS. CINDY HAFNER  
MR. DEAN JAGGER

A quorum was declared.

**II. READING OF THE APRIL 11, 2011 MINUTES (ADOPTED)**

The Board dispensed with reading of the April 11, 2011 minutes. Director Dragani asked for any additions, corrections or deletions to the minutes. Director Dragani asked for a motion to approve the minutes. Ms. Cindy Hafner of the Environmental Protection Agency moved to adopt the minutes and Mr. Chuck Kirchner of the Ohio Department of Agriculture seconded. The motion carried.

**III. OLD BUSINESS**

**A. Updated Status of the URSB Initiatives**

Mr. Michael Bear of the Ohio Emergency Management Agency reviewed the URSB initiatives, including the Perry Nuclear Power Plant Cross-Cutting Human Performance Issues, the Davis-Besse Nuclear Power Station Exercise, After Action Plan Activities, IZRRAG activities, Reactor Oversight Program for Davis-Besse Nuclear Power Station, Beaver Valley Power Station and Perry Nuclear Power Plant, Technology, State Dose Assessment, KI, REP Guidance and NRC Rulemaking, Procedural Review, and the Joint Inspection Observation Program.

Director Dragani commented that as we migrate from the REP stand-alone plan to the integration of the plan into the State EOP that we make sure that we do not lose the valuable information in the REP plan. Mr. Tim Clark stated that no information will be removed, but all information will be in the EOP, the Incident Annex or the Operations Manual.

**B. Midwestern Committee Report**

Mr. Michael Snee of the Ohio Department of Health reported that the Midwestern Radioactive Materials Transportation Committee met on May 10 in Denver in conjunction with the National Transportation Stakeholders Forum. Mr. Dan Fisher of PUCO and Mr. Snee attended the meeting. The minutes of the meeting are published on the Council of State Government's website for those who are interested. If there are any questions, please feel free to contact Mr. Snee. One

note is on June 10, the Committee issued their comments on the draft report of the Blue Ribbon Commission restoring transportation of spent nuclear fuel high-level waste. The final document is expected at the end of July. The committee is making seven recommendations, including looking at building a facility for spent nuclear fuel, since the Yucca Mountain project seems to be defunct.

#### IV. NEW BUSINESS

##### A. Resolution 2011-01, Thanking Carol O’Claire for her service to the Board

Ms. O’Claire retired on May 31, 2011 and this is a resolution expressing our appreciation for her service to the board. Director Dragani entertained a motion to approve the resolution. Mr. Dan Fisher of PUCO approved the motion and Mr. Mike Snee of the Ohio Department of Health seconded the motion. The motion passed.

##### B. URSB Working Group Quarterly Reports

Each of the participating URSB Working Group agencies provided a report of their respective state agency activities. Each agency’s report is available upon request from the URSB Secretary.

##### C. Nuclear Regulatory Commission

Mr. Allan Barker of the Nuclear Regulatory Commission reported on the following topics: oversight of FENOC Plants, Update of the Davis-Besse License Renewal, NRC Temporary Instruction 2515/183-“Follow-up to the Fukushima Daiichi Nuclear Station Fuel Damage Event, and the Special Inspection, Perry Nuclear Power Plant.

Mr. Barker’s report to the Board is attached at the end of the Board-approved minutes.

##### D. Federal Emergency Management Agency

Mr. Dwaine Warren of the Federal Emergency Management Agency, Region V, provided a FEMA Region V Update.

General discussion topics included future increased FEMA and federal participation, exercise activities, evacuation issues, staffing updates and training courses.

##### E. Utility Reports

Mr. Ricky Collings of First Energy Nuclear Operation Company provided the utility report updates.

1. Beaver Valley Power Station
2. Davis-Besse Nuclear Power Station
3. Perry Nuclear Power Plant
4. FENOC

General discussion topics included the Siren Self-Assessment for Beaver Valley Power Station, the License renewal status, the reactor head replacement update and the Tritium leak from March 29, 2011 for Davis-Besse Nuclear Power Station and the Refueling outage summary, the status of cross-cutting areas of human performance and the NRC special inspections-Source Range Monitor Removal from Reactor Core for Perry Nuclear Power Plant.

Mr. Collings' report to the Board is attached at the end of the Board-approved minutes.

V. MISCELLANEOUS

A. Rotation of the URSB Statutory Meeting locations

There was a discussion regarding rotating the location URSB Statutory meetings to locations in each of the nuclear power plant counties. This is in an attempt to generate more local interest, as the meeting will be closer to the plants and with this change, the public participation in the meetings will increase. The January meeting would be held at Ohio EMA and the other three meetings in the year would be in the field. Plant personnel would be able to attend the meetings, along with subject matter experts. Further discussion of this topic will take place at the October Board meeting.

B. Next Meeting

The next meeting of the URSB will be on October 11, 2011 at 1:30 p.m.

VI. ADJOURNMENT

Director Dragani asked if there was a motion to adjourn. Mr. Dan Fisher, PUCO, motioned to adjourn the meeting at 3:30 p.m. Ms. Cindy Hafner of the Environmental Protection Agency seconded the motion. The motion carried.

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DATE

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NANCY J. DRAGANI, CHAIR  
Utility Radiological Safety Board

## Nuclear Regulatory Commission

Good Afternoon -----I will update the board on the NRC oversight activities at Davis-Besse, Perry and Beaver Valley. In addition, I will report on Davis-Besse License Renewal and the Agency's Temporary Procedure 2515/183,"Follow-up to the Fukushima Daiichi Nuclear Station Fuel Damage Event" inspection results.

### Davis-Besse Nuclear Power Plant

On April 19, 2011, the first quarter integrated inspection report for Davis-Besse was issued. Based on the results of this inspection, one NRC-identified finding, and two self-revealed findings, all being of very low safety significance (GREEN) were identified. The NRC-identified finding was the failure to maintain containment trash gate 3 closed and pinned when required in accordance with plant procedures. The inspectors determined that the finding was very low safety significance because the recirculation sump remained functional even with assuming additional debris in a post-accident environment. The self-revealed findings were as follows:

- The failure to appropriately establish and implement a procedure addressing an act of nature when material adjacent to the Davis-Besse switchyard was displaced by high winds and blown into switchyard equipment causing the loss of one required offsite power circuit.
- A clearance order was inadvertently placed that removed control power to the containment isolation valve of a containment air cooler. Without power, the valve was unable to be closed as required.

### Davis-Besse License Renewal Update

The next regulatory action is to issue the draft supplemental environmental impact statement (SEIS) in October 2011 with a public meeting on the draft SEIS in November 2011.

### Perry Nuclear Power Plant

On April 28, 2011, the first quarter integrated inspection report for Perry was issued. Based on the results of this inspection, one self-revealed finding of very low safety significance (GREEN) was identified. The self-revealed finding was the failure to adequately identify the radiological conditions in the fuel pool cooling and cleanup (FPCC) heat exchanger room prior to a pre-job brief for work in the room and prior to workers entering the room. Specifically, on November 19, 2010, operators involved in tag-out activities for a valve encountered elevated dose rates when they entered an un-surveyed area on the back side of the FPCC heat exchanger. At the time the FPCC room was controlled as a locked high radiation area.

### Perry Nuclear Power Plant Special Inspection

On May 25, 2011, the NRC completed a Special Inspection at the Perry Nuclear Power Plant Unit 1, to evaluate the circumstances surrounding an event, where workers who were removing a Source Range Monitor (SRM) detector and cable from the reactor vessel encountered unexpected high radiation dose rates. This radiological event occurred on April 21, 2011. The inspection report documents a finding

associated with the retraction of a stuck source range monitor SRM-C from the reactor vessel that has preliminarily been determined to be a finding with low-to-moderate safety significance (WHITE). The licensee had declared SRM-C detector inoperable in May of 2010 when operators were unable to withdraw the detector from the reactor core during a reactor startup. The SRM-C detector was left inserted in the reactor core the remainder of the operating cycle.

The maintenance plan consisted of using a disposal cask and associated drive mechanism from the sub-pile floor elevation of the drywell. The plan was to operate a take-up cartridge that would remotely fully withdraw the SRM detector and cabling from the drive tube into a disposal cask. In preparation for the SRM detector and cabling retraction, the licensee needed to disconnect instrument cabling from the detector cabling. Then according to the procedure, the licensee was to pull the SRM cable by hand from drive tube until radiation level rises and/or there was approximately 30 feet of cable left in the drive tube. The workers were then supposed to cut the excess cable. The licensee was then to connect the SRM cable to the take-up cartridge leader cable, exit the sub-pile room area, and remotely operate the drive mechanism to spool the SRM cable onto the take-up cartridge until the SRM detector was in the disposal cask.

During the maintenance activity, workers in the under vessel area experienced an unexpected increase in dose rates while attempting to remove SRM-C from the reactor vessel. Upon receipt of high dose rate alarms the workers immediately left the work area.

The highest dose recorded by the electronic dosimeter (ED) worn by each individual worn was 98 mRem. As part of the work activity, the licensee had attached remote dose rate monitoring instrumentation to a section of the SRM detector drive tube that was in the accessible portion of the under vessel area. This remote monitoring instrumentation indicated dose rates greater than 1000 Rem/hr during this event.

During the SRM removal activity individuals tasked with removing the SRM-C failed to properly track and measure the amount of detector cable length retracted from the reactor vessel. This was the licensee's second attempt at performing this task.

Before the NRC makes its enforcement decision, Perry may either: (1) present to the NRC perspectives on the facts and assumptions used by the NRC to arrive at the finding and its significance at a Regulatory Conference; or (2) submit a position on the finding to the NRC in writing. In either case, the NRC requests that Perry addresses why this issue occurred, and what corrective actions were taken. Additionally, this report documents an inspector identified finding associated with a previous unsuccessful attempted retraction of SRM-C that was preliminarily determined to be (GREEN), a finding of very low safety significance. The following summarizes the inspection results.

- Preliminary White. The NRC identified a finding and three apparent violations of NRC requirements associated with the removal of a source range monitor from the reactor vessel. Specifically, the inspectors identified an apparent violation of Title 10 of the Code of Federal Regulations (CFR) part 20.1501 "Surveys and Monitoring," because licensee failed to appropriately evaluate and assess the radiological hazards associated with retracting a source range monitor from the reactor vessel. Following this event, the licensee instituted several corrective actions including procuring a new shielded retrieval and transport cask, retracting the source range monitor detector and cable into the cask from the carousel instead of the sub-pile room floor, and implementing changes to plant procedures and the plant planning process to more effectively control this work. The inspectors determined that a substantial potential for an overexposure did exist, in that, it was fortuitous that the resulting exposure did not exceed the limits of 10 CFR Part 20.

- Green. The NRC identified a finding of very low safety significance for the licensee's insufficient detail in its instructions to workers, to ensure that the SRM-C cable take-up cartridge was

installed correctly. Additionally, the workers failed to follow procedure in removing a nominal nine feet of excess SRM detector cable.

#### PERRY NUCLEAR POWER PLANT READINESS FOR NRC HUMAN PERFORMANCE CORRECTIVE ACTION INSPECTION

In the Perry Nuclear Power Plant Annual Assessment Letter, dated March 4, 2011, (Adams Accession Number ML110620306), the NRC stated that, prior to the 2011 mid-cycle assessment, the NRC would conduct an inspection of the corrective actions that Perry completed to address the long-standing, human performance substantive cross-cutting issue at Perry. In Perry's letter of June 7, 2011, Perry indicated that the plant was not prepared for the inspection, and requested that the NRC perform the inspection later in calendar year 2011. Perry stated that this would allow for additional assessment and corrective action activities, as well as provide more time to demonstrate sustained performance improvement in the human performance area.

The NRC acknowledged receipt of the Perry June 7, 2011, letter and directed to have in writing, no later than October 1, 2011, Perry's readiness for the NRC to inspect the effectiveness of the corrective actions. The NRC will use the results of this inspection in the 2011 End of Cycle assessment, in part, to evaluate the effectiveness of Perry's corrective actions to address the long standing human performance substantive cross-cutting issue.

#### BEAVER VALLEY

On May 13, 2011, the first quarter integrated inspection report for Beaver Valley Units 1 and 2 was issued. Based on the results of this inspection, two self-revealed findings of very low safety significance (GREEN) were identified.

- Technicians inadvertently caused an auxiliary feed water actuation when the plant was shut down for refueling. Specifically, the procedure used to inject simulated steam generator water signals was inadequate, which resulted in the technicians erroneously inserting signals causing actuation of auxiliary feed water.
- Chemistry procedures failed to provide adequate detail to ensure timely completion of required sampling of the spray additive system. Specifically, failure to complete timely sampling and analysis of the chemical addition tank resulted in reasonable doubt of the operability of the spray additive system for 13 days.

#### Temporary Instruction 2515/183 Follow-up to the Fukushima Daiichi Nuclear Station Fuel Damage Event

The objective of this TI is to independently assess the adequacy of actions taken by licensees in response to the Fukushima Daiichi nuclear station fuel damage event. The inspection results from this TI will be used to evaluate the industry's readiness for a similar event, and to aid in determining whether additional regulatory actions by the NRC are warranted.

The NRC has summarized its inspectors' recent examination of the nation's 104 operating nuclear power plants' abilities to deal with power losses or damage to large areas of a reactor site following extreme events. The inspections reaffirm that every plant has the capability, including the use of so-called "B5b" strategies (developed in response to NRC Orders after 9/11 to maintain reactor safety following large

explosions or fires) to effectively cool down reactor cores and spent fuel pools following such events. Out of 65 operating reactor sites, 12 had issues with one or more of the requirements during the inspections; many of these discrepancies deal with training. Three of the 12 sites have already resolved their issues and the remaining sites are actively working to resolve theirs.

The NRC's inspectors examined the plants' B5b strategies, as well as plans for dealing with the effects of flooding or the loss of all the plant's alternating-current power (a station blackout). The inspectors found nine sites had issues regarding some details of their B5b strategies, while three sites had issues with their strategies for dealing with a station blackout. Two sites had issues with strategies for dealing with extreme flooding events. None of these issues undermine the plants' abilities to respond to extreme events.

The NRC carried out the inspections in the aftermath of the March 11 earthquake and tsunami in Japan, and the resulting damage to the Fukushima nuclear power plant. The NRC will use its Reactor Oversight Process to further evaluate the inspection results and ensure any remaining issues are fixed. The agency task force that is examining what lessons can be learned from events at Fukushima will also review every inspection report, currently available on the NRC's website [www.nrc.gov](http://www.nrc.gov).

FENOC Update to URSB  
July 11, 2011

1) Beaver Valley

a) Initial Notification Form.

On June 8th 2011 Beaver Valley implemented a new fleet standard Initial Notification Form. This form is a simplified, streamlined, single page form that will be provided manually in the same manner as current procedures dictate. Training for the onsite personnel who use the form was conducted and applicable offsite stakeholders were included in the change management for this initiative.

b) Siren upgrade project

Beaver Valley is currently in the final stage of its siren upgrade project which will finish in August 2011. At the conclusion of this project all 119 Alert and Notification System sirens will have been replaced and all will have battery backup capability in order to ensure continued functionality in the event of a loss of power.

2) Davis-Besse

a) License Renewal

NRC License Renewal Audit and Inspection Schedule (2011):

- Scoping and Screening Audit held the week of January 24
- Aging Management Programs Audit held the weeks of February 14 and 21
- Environmental Audit held the week of March 7
- License Renewal Inspection held the weeks of April 25 and May 9.
- A follow-up Inspection is schedule for the week of August 22.

A “Request for Hearing” by interveners was sent to the NRC to express their concern regarding environmental aspects of the LRA. A public hearing was held at the Ottawa County Courthouse on March 1, 2011, regarding admissibility of the contentions raised by the interveners. The Atomic Safety and Licensing Board (ASLB) 3-Judge Panel ruled that the Davis-Besse License Renewal Application contentions are admissible as revised by the Board, and that all four Petitioners have standing. FirstEnergy submitted an Appeal to clarify the contentions; the Appeal is under review by the NRC Commissioners.

NRC began sending License Renewal “requests for additional information” (RAIs) in February 2011. FirstEnergy responses to the requests have been submitted to the NRC as scheduled. Strong site support is being provided to ensure a successful License Renewal Project.

b) Reactor Head replacement

The new Reactor Vessel Head is being moved from the temporary storage facility to the new Temporary Assembly Building (TAB) during the week of 7/5/11. It has been stored there since it arrived at Davis-Besse from France in November of last year. In the TAB the Reactor Vessel

Head will be modified for a new continuous vent line, will have the new Integrated Head Assembly that is in its final fabrication stages installed, and will have 61 new Control Rod Drive Mechanisms installed as part of the preparations for installation in October. Activities are on schedule to have the new Reactor Vessel Head and Integrated Head Assembly ready to support installation.

c) Tritium Leak – March 29, 2011

The station determined the cause for elevated tritium in Davis-Besse sampling wells was from a valve mis-positioning which allowed secondary steam/condensate containing tritium to enter the storm sewer system. This condition existed for more than 2 months before it was discovered. A short time after the valve was closed and the source of tritium was stopped, the tritium in the wells began to decrease, and has continued to decrease. Normal semi-annual sampling will take place again in September, and the 5 additional wells of interest will be included to verify the continued downward tritium trend. Corrective Actions included actions to heighten the awareness of operators and supervisors when work has the potential to release water containing tritium. Included in the actions were training and an evaluation by Operations of ways to better control work processes.

3) Perry Nuclear Power Plant

a) Refueling Outage Summary (1R13)

Commenced April 18, 2011 @0001

Completed June 7, 2011 @ 0035

Total dose during the Outage was 268 Rem, (goal of 260 Rem). A total of 1462 work orders were completed during the Outage. Major work activities improving the Plant reliability included:

- Replaced Main Generator Stator
- Replaced “A” Reactor Feed Pump Turbine Rotor
- Replaced 6 Local Power Range Monitor Dry Tubes
- Replaced 10 Control Rod Blades
- Replaced 19 Control Rod Drive Mechanisms
- Replaced 2 Drywell Air Cooling Fans
- Replaced Source Range Monitor “C” Detector
- Replaced Source Range Monitor “B” & “C” cabling
- Rebuilt Division 2 Diesel Engine
- Replaced an Extraction Steam Manifold Header
- Replaced “A” Reactor Feed Booster Pump Motor
- Replaced “A” Reactor Recirculation Pump Seal

b) Status of Cross-Cutting Areas of Human Performance

The current Perry Nuclear Power Plant (PNPP) status in regards to the Nuclear Regulatory Commission (NRC) Reactor Oversight Process is as follows:

The PNPP operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the assessment period (2010) was within the Licensee Response column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all Performance Indicators indicating performance at a level requiring no additional NRC oversight (Green). The next NRC update is expected in the mid-cycle assessment letter which should be issued in early September 2011 and will address plant performance through June 30, 2011.

For the current assessment period from January 1, 2010, through December 31, 2010, the total number of inspection findings with documented cross-cutting aspects remained constant at 14. Performance at the Perry Nuclear Power Plant during the assessment period continued to exhibit weaknesses in the area of human performance. The NRC's assessment of the findings identified an additional cross-cutting theme in the human performance area, based on four findings with a cross-cutting aspect of documentation/procedures (H.2(c)). In addition, while the number of findings in the work planning (H.3 (a)) cross-cutting aspect decreased from four to three during the most recent assessment period, the NRC concluded it was apparent that actions to date have not resulted in sustainable positive improvement in the area of work planning.

Therefore, the NRC determined the human performance substantive cross-cutting issue will remain open until the number of findings in the H.2(c) and H.3 (a) aspects are reduced and PNPP demonstrates the implementation of effective corrective actions that result in sustained performance improvement in the human performance area.

c) NRC Special Inspection – Source Range Monitor Removal

Root Cause Analysis - Failure to recognize the risk associated with Source Range Monitor Detector C removal as evident by the less than adequate preparation, review, procedural guidance, and job performance actions to address an unknown, high dose rate condition.

The potential dose rate from the Source Range Monitor being stuck in the core at power operations was not accurately estimated. The resultant review and controls established in the detector removal procedure, Order, ALARA Plan, ALARA Action Plan, RWP, and associated briefings were insufficient to address the dose rates seen from the Source Range Monitor.

Corrective Actions

Prevent Recurrence Action 1 - Revise NOP-OP-4107, "Radiation Work Permit (RWP)" to require that the following actions are taken when removing an incore nuclear instrumentation detector:

- Request a dose rate assessment, via calculations or decay curve, for estimation of potential dose rates.
- Until actual dose rates are determined for incore detectors, require that engineering or administrative controls be established to prevent unplanned over exposures or unexpected dose rate conditions.
- Incore probes shall not be removed within 48 hours of insertion in a neutron field.

Prevent Recurrence Action 2 - Revise NOP-WM-1001, "Order Planning Process" to provide guidance on performing a dose rate assessment, via calculation or decay curve, and establishing engineering or administrative controls when the work activity involves removal of a Nuclear Instrument Detector (Incore & Excore).

Prevent Recurrence Action 3 - Revise the procedural guidance in IMI-E2-0028 to address a detector stuck in the core. Include the following issues:

- Ensure a dose rate calculation or decay curve is completed.
- Ensure the disposal cask is sufficient for the potential dose rate.
- Perform the evolution from the carousel location.
- Establish conservative controls on withdrawal rate and set appropriate stopping points to check for dose rate changes.

- Establish the locations and equipment to be used to measure for any dose rate changes.
- Consider workers egress paths when setting up work locations.
- Discuss immediate actions needed to place the equipment in a safe condition; i.e. when removing the cable by hand, reinsert the detector cable if higher than expected dose rates are seen.
- Clarify the directions for installing the take up reel cartridge in the disposal cask to ensure proper orientation.
- Clarify the directions for cutting the 9 feet of cable and provide a recommended method for measuring the cable length to be cut.
- Include cautions or radiological hold points immediately prior to steps that could cause a significant increase in work area dose rates (per SOER 2001-01).

#### 4) FENOC

##### a) Common dose assessment update

FENOC ERS personnel have supplied raw data from the current dose assessment software programs to the contractor. They are assimilating the data and migrating it into the new MIDAS software.

On going actions include:

- Development of a single fleet level procedure to implement MIDAS software. (NOP-OP-5007).
- FENOC is obtaining information from OEMA and PEMA on 10 EPZ EPRA boundary lines for FENOC nuclear facilities.
- IT Business Analyst working on integration links to auto populate the program from site computers.
- Work to finalize a common/standard FENOC follow-up/periodic notification form.

##### b) E-data update

- Beaver Valley – Unit 1 and 2 actual plant data continues to be available live time. Unit 1 and 2 simulator data has been networked and the web pages are in testing on FENOC's Developmental Server. Expected to move on to the Production server and be available for drills and exercises in early August.
- Davis-Besse – Simulator is available during drills and exercises. Plant data is networked. Working to provide data to the Developmental server for testing. Changes to simulator and actual plant data screens (3 points) are being made at the same time. Expect live plant data to be on line by the end of August.
- Perry – Live plant data remains available as does the simulator data for drills and exercises.

##### c) WebEOC

FENOC has developed the following elements of WebEOC:

- Single site priority board
- Initial Notification and Follow up Notification form boards
- EOF, TSC, OSC and JIC task boards (tracks actions to support over all site priority board items).

The products are in final testing prior to being presented to the stations for use by the ERO members. Feedback will be obtained and incorporated into changes (if needed). The final products will go live when the new EOF's are put into service in early 2012. The tool will be available for the Beaver Valley Evaluated Exercise.

The fleet expects to contact state and local partners in late summer 2011 to coordinate the use of WebEOC to provide Initial and Follow up Notification forms electronically.

d) New Emergency Operations Facilities/Technical Support Centers

Ground breaking ceremonies have occurred at Beaver Valley and Perry. Davis-Besse is planned for late July or early August. Actual construction begins the week of July 11, 2011 at Perry. One final permit is needed at Beaver Valley and one at Davis-Besse with both expected by the 7/15/11. Equipment for the facilities is on order with no delivery challenges and no impact on the projected schedules expected. Communications and data (including running additional fiber optic cable) solutions are in progress. Emergency Plans and supporting procedure reviews and changes are underway including the preparation of the necessary 10 CFR 50.54 (q) evaluations. No decrease in effectiveness have been are expected to be identified.

e) County Liaison Back-up Plan

The individuals needed to back up existing FENOC personnel have been identified and in most cases those individuals have been to the counties for indoctrination. The actions are contained and tracked by the FENOC Excellence Plan. No challenges are seen to implementation of the plan.