

July 15, 2005

Mr. Joseph M. Solymossy
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - AUDIT
OF THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NOS. MC6522 AND MC6523)

Dear Mr. Solymossy:

An audit of the Nuclear Management Company commitment management program was performed at the Prairie Island Nuclear Generating Station (PINGP) site on May 17 through 19, 2005. The U.S. Nuclear Regulatory Commission (NRC) staff concludes that, based on the audit, (1) PINGP has established an effective commitment management program, (2) PINGP has implemented NRC commitments on a timely basis, and (3) with some minor inconsistencies, which were discussed with the licensee during the exit meeting on May 19, 2005, PINGP has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

The NRC staff appreciates the resources that were made available by your staff for performing the audit. If you have any questions, I may be reached at (301) 415-8371.

Sincerely,

/RA/

Mahesh Chawla, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Audit Report

cc w/encl: See next page

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DATE	7/5/05	7/1/05	7/15/05

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION (NRR)
AUDIT OF NUCLEAR MANAGEMENT COMPANY (NMC) MANAGEMENT OF
REGULATORY COMMITMENTS
MADE BY NMC TO THE NUCLEAR REGULATORY COMMISSION (NRC)
PRAIRIE ISLAND NUCLEAR GENERATING STATION, UNIT 1 AND 2
DOCKET NOS. 50-282 AND 50-306

1.0 INTRODUCTION AND BACKGROUND

On September 7, 2004, NRR Office Instruction LIC-105, Revision 1, "Managing Regulatory Commitments Made by Licensees to the NRC," was published. LIC-105, which is publicly available electronically from the Agencywide Documents Access and Management Systems (ADAMS) Public Electronic Reading Room on the Internet at the NRC website (Accession No. ML042320463), provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made by licensees of commercial nuclear reactors to the NRC staff. The guidance is consistent with the industry guidance prepared by the Nuclear Energy Institute (NEI), NEI 99-04, "Guidance for Managing NRC Commitment Changes."

According to LIC-105, which cites the definition from NEI 99-04, a "regulatory commitment" is an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. LIC-105 further directs the NRR Project Manager to "audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.)." The audit is to be performed every 3 years.

2.0 AUDIT SCOPE AND RESULTS

2.1 Audit Scope

The audit was performed at the Prairie Island Nuclear Generating Station(PINGS) site May 17 through 19, 2005. Since no such audit was performed prior to the issuance of LIC-105, the NRC staff defined the period covered by this audit to encompass approximately 3 to 4 years prior to the date of the audit.

LIC-105 limits the audit of commitments to those made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Prior to the audit, in order to generate a list of items for the audit, the NRC staff

performed Public, Web-Based ADAMS search for commitments listed in licensing action and licensing activity submittals dated in the last 3 to 4 years. From this list, the NRC staff selected a representative sample of regulatory commitments to audit. The selection of the sample list covered variety of systems, disciplines and licensing actions important to NRC staff's decision making process. This list also included commitment changes. The licensee was also asked to provide a list of regulatory commitments related to licensing actions from its commitment management system. The NRC staff again ensured that the sample selected related to the licensee's licensing action and licensing activity submittals and asked the licensee to provide documentation to support the audit.

The licensee provided the list and the documentation to support the NRC staff's audit in each of the sample areas discussed above. The licensee's documentation included summary sheets providing the status of the commitment and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The attached table lists the commitments selected for this audit.

2.2 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit was to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments that had not yet been implemented, the NRC staff aimed to ascertain that they have been captured in an effective program for future implementation.

The licensee's Commitment Management Program is described in the licensee procedure "Control of NRC Commitments", 5AWI 1.7.1, Revision 7, dated January 20, 2004. The licensee enters commitments made to the NRC into a commitment database called "Team Track." This database is used to track all commitments, including the regulatory commitments. However, procedure 5AWI 1.7.1 does not require the program to remind the responsible department when the expected completion date approaches. There is a weekly reminder generated by the Regulatory Affairs Department and is distributed to all the disciplines responsible for the commitments. Individuals assigned for completing a NRC Commitment is responsible for updating Team Track upon completion of the commitment. The NRC staff found that the licensee's procedure 5AWI 1.7.1 is consistent with the guidance provided in NEI 99-04.

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table that are categorized as Commitment Changes, Relief Requests, and PINGS Amendments, to assess the implementation of the licensee's procedure 5AWI 1.7.1, including the status of their completion. For the sample of commitments selected for the audit, the NRC staff found that the licensee's commitment tracking program had captured all of the regulatory commitments with one exception. For remainder of the commitments, Team Track reflected their status consistent with the program. However, the NRC staff noted that implementation of the program had some minor inconsistencies. These observations are described Section 2.4.

2.3 Verification of the Licensee's Program for Managing NRC Commitment Changes

2.3.1 Change Control Procedure Verification

The NRC staff reviewed the licensee's procedure 5AWI 1.7.1, against NEI 99-04, Revision 0.

Although this procedure follows the NEI guidance, it does not take any credit for it. Regulatory Commitment Changes are processed and tracked by Regulatory Affairs Department (Site Licensing) and are approved by the Site Management. Regulatory Commitment Change Worksheet Form (PINGP 1256, Rev. 5) is used to document the evaluation of the commitment change.

The NRC staff found that the licensee's procedure for handling the commitment change is in general, consistent with the guidance in NEI 99-04. There were some minor differences found which have been listed in section 2.4.

2.3.2 Procedure Implementation Assessment

2.3.2.1 Commitment Changes Reported to the NRC

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table that are categorized as Commitment Change. The NRC staff found that, with a few minor inconsistencies, the licensee had properly addressed each regulatory commitment change selected for this audit and that the licensee had implemented an effective program to manage commitment changes. The NRC staff observations and suggestions are described in Section 2.4.

2.3.2.2 Commitment Changes Not Reported to the NRC

The licensee indicated that there were four commitment changes which were not reported to the NRC. The reason for not reporting these to NRC was properly documented in the commitment change worksheets and was done in accordance with NEI 99-04. Two commitment changes were to be reported with 50.59 Annual Report. These changes were reviewed and found to be appropriate and acceptable by the NRC Staff.

2.3.2.3 Notifications to the NRC of Commitment Changes

Three commitment changes were reported to the NRC by the licensee in Once-Per-Cycle Summary Report, dated December 10, 2003. The reason for including these in Once-Per-Cycle Summary Report to the NRC was properly documented in the commitment change worksheets and was done in accordance with NEI 99-04. These changes were reviewed and found to be appropriate and acceptable by the NRC Staff.

2.3.2.4 Traceability of Commitments

Although not specifically stated in the guidance from NEI 99-04, according to LIC-105, traceability of the commitments is advantageous for the licensee's Control of NRC Commitments. The licensee's procedure, 5AWI 1.7.1, defines the process for ensuring that NRC Commitments are completed as stated and in accordance with the established schedule. Commitments are promptly entered in "Team Track" with all the pertinent details. As listed in Section 6.2 Commitment Tracking of 5AWI 1.7.1:

- 6.2.1 For NRC Commitments, the tracking system data base SHALL contain, as a minimum, the following information:
- a. The commitment number (unique identifier)
 - b. The source of commitment (letter date or unique identifier)
 - c. A brief description of the commitment
 - d. The person assigned responsibility for completion
 - e. The date (if any) the commitment is to be completed
 - f. The date the committed action was completed
 - g. A description of actions taken to satisfy the commitment
- 6.2.2 Additional information concerning affected procedures, component identification, system, topic, structures, etc., should be provided if available to enhance the usefulness of the tracking system as a historical record.

The system generates weekly reminders which are distributed to the responsible departments for upcoming due dates. As stated in Section 5.4.3 of 5AWI 1.7.1, the individuals assigned responsible for completion of NRC commitments ensure that these commitments are properly identified and incorporated into plant design features, procedures, and training programs may result in change in procedures.

Procedural steps modified due to a NRC commitments show letter "N" in the left column. The reference section further provides the commitment number corresponding to "N." In case of multiple commitment in the same procedure, they are listed as "N1," "N2" etc. This provides traceability of the commitments to the procedures and vice versa. In case of a procedure revision, Procedure Change Request Form (PINGP 436, Rev. 23) requires you to answer the question if the change is due to a commitment. Also, in Section V.5, the approver has to ensure that the procedure change does not conflict with NRC commitments. Thus, traceability between commitments and procedural changes is maintained.

As an example, procedure 1ECA-1.3, Section A "Purpose" shows "N" in the left column. Reference D2, has the listed commitment as "COM032481." This commitment was made in response to NRC Bulletin 2003-01 to respond to a recirculation sump blockage condition that prevents establishing or maintaining at least one train of emergency core cooling system flow in the recirculation mode. The NRC staff found that the licensee's commitments, with a few minor inconsistencies, were traceable. These inconsistencies are described in Section 2.4.

2.4 Audit Observations and Suggestions

As stated above, the licensee's Control of NRC Commitments in accordance with the procedure 5AWI 1.7.1 is consistent with the NEI Guidance, NEI 99-04. However, the NRC staff has made the following observations during the audit and believes that implementation of suggestions would enhance the process and add consistency to the implementation process:

1. The existing Team Track System does not provide the detailed basis for the commitment. It only provides the reference to the correspondence, generic letter or the bulletin number as the reason for the commitment.

2. The commitments have a priority assigned to them. However, FP-PA-ARP-01, Rev. 7, which is the procedure for assigning these priorities, was revised to remove the definition of priorities. Therefore, the use of the priorities in the Team Track System is not clear since the commitments are tracked by the due dates.
3. There is a checklist for updating the Team Track System once the outgoing correspondence, containing a commitment, is issued. However, this process is not proceduralized and there is no time period specified to update the Team Track System.
4. The Team Track System has fields for "Due Date" and "NRC Commitment Date." However, the system allows the "NRC Commitment Date" to be left blank and also does not have the restriction on the "Due Date" to be on or before "NRC Commitment Date."
5. Procedure 5AWI 1.7.1, Rev. 7, "Control of Commitments" does not emphasize that commitments shall not be issued without a due date, unless the due date is not within the NMC controls. This is possible in case of an evaluation done by a third party such as a Joint Owners group which the plant may commit to review and implement, but a date is dependent upon the third party evaluation.
6. The list of samples provided to the NRC could be traced to Team Track System, except for one commitment which was never entered. However, this commitment was tracked outside the Team Track System and was completed by the due date. As a part of their Corrective Action Program (CAP), licensee generated CAP042588 on May 20, 2005, to address this issue.
7. Section 5.3.3 of 5AWI 1.7.1 requires that Supervisors notify Site Licensing (aka Regulatory Affairs) that a commitment is complete. Section 6.4.3 further specifies that Activity Supervisor SHALL approve commitments to Licensing (Regulatory Affairs). The guidance of 5AWI 1.7.1 was not followed in six of ten examples selected for this audit. Licensee generated CAP042589 on May 20, 2005, to address this issue.
8. Commitment COM027523 was made in the Prairie Island response to NRC Bulletin 2003-01. Subsequently, NRC issued Generic Letter 2004-02. Prairie Island in its response to GL 2004-02, issued Engineering Work Request (EWR) 036255. Since the actions were redundant, Engineering Department closed the commitment to the EWR. However, the level of tracking of commitments is more rigorous than the level of tracking of EWRs, so commitments should not be closed to the other Team Track items. Licensee generated CAP042592 on May 20, 2005, to address this issue.
9. Commitment COM027521 was made in Prairie Island response to NRC Bulletin 2003-01. This commitment was closed out, in part, to revision to Surveillance Procedure (SP)1750 for Unit 1, and SP2750 for Unit 2. However, the procedures do not include the commitment as a reference and do not include an "N" commitment codes related to the commitment. Licensee generated CAP042593 on May 20, 2005, to address this issue.
10. The comparison of Regulatory Commitment Change form with NEI 99-04 Commitment Evaluation Form resulted in the following observations:

No.	NEI 99-04	Prairie Island
1	Section 2.2 has three questions from 10CFR 50.92 (c), (1) through (3) listed individually with Yes/No options	Section 2 only refers to using 10 CFR 50.92 (c) (1) through (3) but does not list them individually with Yes/No options
2	None specified in this guidance	Section 3.B appears to be redundant
3	Section 3.2 - Under "Yes" requires NRC notification of revised commitment date prior to the original commitment date.	This is missing from section 3.A
4	None specified in this guidance	Section 4 refers to basis for safety decision in a NOED.
5	None specified in this guidance	Section 4 has item (4) long term corrective action in response to a NRC Notice of Violation?
6	None specified in this guidance	Under Section 4, if the answer is "Yes" and under this if the further answer is "No", it asks for timely notification of commitment change to NRC

3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) NMC has established an effective commitment management program, (2) NMC has implemented NRC commitments on a timely basis, and (3) with some minor inconsistencies, which were discussed with the licensee during the exit meeting on May 19, 2005, NMC has implemented an effective program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Principal Contributor: Jeff Kivi

Other Contributors : Dale Vincent, Jack Leveille, Gabe Salamon

NRC Principal Contributor: M. Chawla

Date: July 15, 2005

AUDIT OF ENTERGY OPERATIONS, INC. (ENTERGY) MANAGEMENT OF
REGULATORY COMMITMENTS

AT PRAIRIE ISLAND NUCLEAR GENERATING STATION (PINGS), UNIT 1 AND 2

PERFORMED DURING MAY 17 THROUGH MAY 19, 2005

LIST OF COMMITMENTS INCLUDED IN THE AUDIT

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
1	Bulletin 2003-01	COM27516	L-PI-03-063, dt. 8/6/03	NMC will develop and administer training on sump clogging by January 31, 2004.	Closed
2	Bulletin 2003-01	COM27517	L-PI-03-063, dt. 8/6/03	NMC will conduct additional evaluations to determine an appropriate minimum Refueling Water Storage Tank (RWST) liquid level to secure Containment Spray (CS). The results of these evaluations will be factored into the procedures. This evaluation of securing CS and any subsequent procedure changes will be completed by January 31, 2004.	Closed
3	Bulletin 2003-01	COM27519	L-PI-03-063, dt. 8/6/03	NMC will submit an implementation schedule for revising plant emergency operating procedures, where appropriate, to stop or throttle redundant pumps that are not necessary to provide required flow to cool containment and the reactor core within 30 days of issuance of the generic guidance by the Westinghouse Owners group, currently expected by March 31, 2004.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
4	Bulletin 2003-01	COM27520	L-PI-03-063, dt. 8/6/03	NMC will implement a procedure to enhance operator guidance for refilling the RWST from alternative water sources. This procedure will be implemented by January 31, 2004.	Closed
5	Bulletin 2003-01	COM27521	L-PI-03-063, dt. 8/6/03	NMC will enhance containment closeout and foreign materials controls beginning with the next Unit 2 refueling outage 2003.	Closed
6	Bulletin 2003-01	COM27522	L-PI-03-063, dt. 8/6/03	NMC will implement a procedure revision to address potential debris ingestion by January 31, 2004.	Closed
7	Bulletin 2003-01	COM27523	L-PI-03-063, dt. 8/6/03	NMC will perform an evaluation to analyze the emergency core cooling system recirculation functions with respect to the potentially adverse post-accident debris blockage effects on the containment supm, taking into account the recent research findings, to determine compliance with all applicable regulatory requirements. NMC will continue to work with the Nuclear Energy Institute (NEI) to follow Generic Safety Issue 191 resolution methodology currently being developed by NEI. NMC will implement the methodology, as appropriate for Prairie Island.	Closed by EWR 036255 (Not Completed)
8	QA Topical Report	COM000894	dt.10/31/2003 dt 09/22/2004	Implement the QATR at NMC plants by November 12, 2004, or within 6 months of NRC approval, whichever is later. (original commitment) Implementation of the NMC Quality Assurance Topical Report will be completed throughout NMC within 9 months following NRC approval. (Revised commitment)	Open

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
9	QA Topical Report	COM038873	dt.10/31/2003	Statements in the Monticello and Prairie Island Operational Quality Assurance Program (OQAP) concerning quality assurance for Fire Protection will be relocated to applicable site Fire Protection Program Plans, as referenced in the sites' Updated Safety Analysis Reports (USARs).	Open
10	GL 2003-01	COM29564	L-PI-03-114, dt. 12/9/2003	Prairie Island is currently in the process of re-performing the survey of off-site chemicals. This new survey will be completed by July 2004.	Closed
11	GL 2003-01	COM29567	L-PI-03-114, dt. 12/9/03	Prairie Island does commit to submit to the NRC proposed changes to the Technical Specifications that will capture the intent of the current TSTF and final NRC position within 6 months following the approval of the TSTF-448, Rev. 1, for adoption.	Open
12	GL 2003-01	COM29568	L-PI-03-114, dt. 12/9/2003	Prairie Island is committing to perform tracer gas testing in 2004.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
13	Commitment Change	OTH012736 (ACT 19900112)	L-PI-03-102, dt. 12/10/03	<u>Commitment Change 03 - 01</u> GL 89-19 came out to deal with concerns about steam generator overfill protection. One of the items made in response to the generic letter was to take credit for testing of the feedwater isolation function. Five seconds was chosen because feedwater isolation was credited to occur within 5 seconds of receiving the actuation signal in the steamline break analysis. Subsequently the steamline break analysis was revised to incorporate a 7 second (rate of valve closure) input for feedwater isolation. The commitment must be revised to credit testing the valve closure to occur in 7 seconds to allow changing the maximum allowable close time for the main and bypass feedwater control valves.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
14	Commitment Change	OTH007725 (ACT 19850021)	L-PI-03-102, dt. 12/10/03	<p><u>Commitment Change 03 - 02</u> A review of the approved exemptions against the current safe shutdown analysis was completed and documented in Calculation GEN-PI-031, Revision 1, and the results transmitted in LER 1-98-12, Supplement 3. The results of the review identified that various design changes in the mid-90's removed some of the Kaowool fire barriers and the thermal shield, and manual actions were credited in the safe shutdown analysis. To correct these discrepancies, it was recommended that the 1-hr barrier be re-installed around one train of systems. Because a majority of the Train A AFW system components are located outside Fire Area 31, it was determined that protecting Train A safe shutdown cables (in lieu of Train B) with a 1-hr fire barrier met the intent of Section III.G.2.</p> <p>Modification 00FP01 removed the remaining Kawool fire barriers and replaced them with 3M fire barriers (1-hour fire rating), and also installed the 1-hr rated protection (3M fire barrier) around the Train A cables that would require protection from fire damage. This design was completed in 2002.</p> <p>This commitment change only addresses the commitment specifically made in Fire Area 31 to protect Train B safe shutdown conduits with 1-hr fire barrier and to install a thermal shield on top and bottom of cable tray 2SG-LB17. Other commitments made in the approved exemption will continue to be maintained.</p>	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
15	Commitment Change	CAP032174 (EWR006765)	L-PI-03-102, dt. 12/10/03	Commitment Change 03 - 03 We no longer plan to perform secondary side hydrostatic pressure testing of newly installed rerolls.	Closed
16	Amendment	COM34715	L-PI-04-001, dt. 01/20/04	Implement the guidelines of NUMARC 93-01, Revision 3, Section 11.3.6, "Assessment Methods for Shutdown Conditions," Subsection 11.3.6.5 quoted in letter L-PI-04-001 (the License Amendment Request)."	Closed
17	10 Yr ISI	Not Entered in Team Track	L-PI-04-094, dt. 07/23/04	To ensure the extremities of the weld are included in the examination volume, a margin of 0.5 inches will be conservatively added to the scanning path of all transducers in all directions as allowed by component geometry.	Closed
18	ECCS Evaluation	COM35034	L-PI-04-111, dt. 09/24/04	In this letter NMC commits to provide a new Large-Break Loss-of-Coolant Accident analysis for the Prairie Island Nuclear Generating Plant by March 31, 2006.	Open
19	Bulletin 2003-01	COM032480	L-PI-04-050, dt. 05/14/04	NMC will complete implementation of COA#7 by including emphasis on aggressive Cooldown and depressurization in future periodic operator training. This will be incorporated into the operator training materials by July 31, 2004.	Closed
20	Bulletin 2003-01	COM032481	L-PI-04-050, dt. 05/14/04	NMC will complete implementation of COA #9 by implementing the WOG Sump Blockage Control Room Guidance (SBCRG) into plant procedures by April 30, 2005.	Closed

Item No.	Category	Commitment Number	Commitment Letter/Date	Description of Commitment	Status
21	Commitment Change	96-01 ¹	NSP to NRC letter dt. 10/5/81	Using 10 CFR 50.59, relax the LP Turbine rotor inspection interval described in USAR Section 12.2.7.2. As a result of this change, the Unit 1 LP Turbine rotor inspection will not be performed during the January 1996 Unit 1 refueling outage.	Closed
22	Commitment Change	96-06 ¹	NSP to NRC letter dt. 10/5/81	Using 10 CFR 50.59, relax the LP Turbine rotor inspection interval described in USAR Section 12.2.7.2. As a result of this change, the Unit 2 LP Turbine rotor inspection will not be performed during the January 1997 Unit 2 refueling outage.	Closed
23	Commitment Change	02-04 ¹ (OTH017233)	NSP to NRC letter dt. 4/15/83 (GL 82-33)	Commitment Change 02-04 documents the elimination of the Headquarters Emergency Center (HQEC). The facility used as the HQEC also served as backup Emergency Operating Facility (EOF) for Prairie Island and Monticello. The facility (at Renaissance Square) will continue to serve as backup EOF.	Closed
24	Commitment Change	04-03 ¹ (OTH002736)	LER 2-95-02	The commitment will be deleted, and the implementing note prior to step 5.4.17, (referenced above), is no longer required and will also be deleted.	Closed

Note 1 - No NRC notification of this commitment change required.

Prairie Island Nuclear Generating Plant, Units 1 and 2

cc:

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June 2004