

April 18, 2006

Mr. Christopher M. Crane  
President and Chief Executive Officer  
AmerGen Energy Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - AUDIT OF THE  
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC  
NO. MC8310)

Dear Mr. Crane:

The Nuclear Regulatory Commission (NRC) staff is required to audit a licensee's commitment management program once every 3 years, in accordance with the NRC Office of Nuclear Reactor Regulation Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." LIC-105, which is publicly available electronically from the Agencywide Documents Access and Management Systems Public Electronic Reading Room on the Internet at the NRC web site (Accession Number ML042320463), provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made to the NRC staff by licensees for commercial nuclear reactors. The guidance is consistent with the industry guidance prepared by the Nuclear Energy Institute (NEI) in NEI 99-04, "Guidance for Managing NRC Commitment Changes."

An audit of AmerGen Energy Company, LLC's (AmerGen's) commitment management program for the Three Mile Island Nuclear Station, Unit No. 1 was performed at AmerGen's office in Kennett Square, Pennsylvania, on January 11 and 12, 2006. Based on this audit, the NRC staff concludes that: (1) the licensee had implemented NRC commitments on a timely basis; and (2) the licensee had implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

C. Crane

-2-

The NRC staff appreciates the resources that were available by your staff, both before and during the audit. If you have any questions, please have your staff contact me at (301) 415-1447.

Sincerely,

*/RA/*

Farideh E. Saba, Project Manager  
Plant Licensing Branch I-2  
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Docket No. 50-289

Enclosure:  
As stated

cc w/encl: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
REGULATORY COMMITMENTS MADE BY AMERGEN ENERGY COMPANY, LLC TO  
THE NUCLEAR REGULATORY COMMISSION  
THREE MILE ISLAND NUCLEAR GENERATING STATION, UNIT NO. 1  
DOCKET NO. 50-289

1.0 INTRODUCTION AND BACKGROUND

On September 7, 2004, the U.S. Nuclear Regulatory Commission (NRC) published the Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," Revision 1. LIC-105 provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made to the NRC staff by licensees for commercial nuclear reactors. The guidance is consistent with the industry guidance issued by the Nuclear Energy Institute (NEI) in NEI 99-04, "Guidance for Managing NRC Commitment Changes." The current revision to LIC-105 is publicly available electronically from the Agencywide Documents Access and Management Systems (ADAMS) Public Electronic Reading Room on the Internet at the NRC web site (Accession Number ML042320463).

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 PROCEDURE AND RESULTS

The audit of the Amergen Energy Company, LLC (AmerGen or the licensee) commitment management program for the Three Mile Island Nuclear Station, Unit No. 1 (TMI-1) was performed at the AmerGen offices in Kennett Square, Pennsylvania, on January 11 and 12, 2006. 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 4-to-5 years prior to the date of the audit. In accordance with LIC-105, audits consist of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

Enclosure

## 2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is 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.

### 2.1.1 Audit Scope

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.). Accordingly, the audit excluded the following types of commitments:

- Commitments made on the licensee's own initiative among internal organizational components.
- Commitments that pertain to milestones of licensing actions/activities (e.g., response to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

Prior to the audit, in order to generate a list of items for the audit, the NRC staff performed public, web-based ADAMS searches for commitments listed in licensing action and licensing activity submittals from 2000 through 2005. From this list, the NRC staff selected a representative sample of regulatory commitments to audit. The selection of the sample list covered a variety of systems, disciplines and licensing actions important to NRC staff's decision-making process. This list also included commitment changes. The NRC staff 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 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 summarizes the licensee's commitments that were audited by the NRC staff and the current status of licensee commitments.

### 2.1.2 Audit Results

The licensee's commitments are tracked by a total of three programs: Plant Information Management System Commitment Tracking, Passport, and Lotus Notes. The proliferation of tracking programs has to do with the fact that ownership of TMI-1 was acquired from the former owner and transferred to AmerGen, an Exelon subsidiary. AmerGen/Exelon is continuing the

effort of converting the processes, including the commitment tracking programs, to the “Exelon way.” The NRC staff, therefore, aimed to ascertain that commitments had not “fallen through the cracks” because of multiple tracking programs, and the past transfer of ownership. During the audit, the NRC staff reviewed reports generated by all three tracking programs, and other documents related to the commitments.

The NRC staff reviewed reports generated by one or more of the three tracking programs for the commitments listed in the attached table to evaluate the status of completion. The NRC staff found that the licensee’s commitment tracking programs had captured all the regulatory commitments that were identified by the NRC staff before the audit. The NRC staff also reviewed plant procedures that had been revised as a result of commitments made by the licensee to NRC.

The NRC staff noted that some of the new/revised procedures have annotations to refer to commitments. These annotations would serve to prevent future procedure writers from inadvertently deleting or altering an item without having gone through the commitment change process. However, the older procedures have not been annotated. The licensee indicated that the former owner and operator of TMI-1 did not have requirements for commitment annotations in the procedures. The “Writer’s Guide for Exelon TMI Procedures,” Revision 6 states that this guidance, including commitments in Section 6.3 of the guidance and annotation guidance on page 13 of the guidance, is applicable to all new procedures, or procedure revisions affecting 30% or more of content, or at the discretion of the site functional area manager for revisions that affect less than 30% of content.

The NRC staff noted one instance in which a procedure that was impacted by a regulatory commitment was revised, however, the NRC was not informed. AmerGen, in its letter dated August 6, 2003, committed to “improve the containment closeout inspection procedure to specifically address dirt, dust and small debris accumulation.” This commitment had been originally implemented in the applicable procedure. However, subsequent to the transition to the corporate procedure, the original procedure was replaced by a new procedure. During the NRC staff’s audit of the licensee’s regulatory commitments, the NRC staff indicated that the current procedure does not specifically address the cleanup of dirt, dust, and small debris accumulation. As a result, the licensee issued a condition report to initiate revision to the applicable procedures to ensure that “dirt, dust, and small debris accumulations” are appropriately addressed in the containment closeout inspections, and to flag this as a commitment.

## 2.2 Verification of the Licensee’s Program for Managing NRC Commitment Changes

The NRC staff reviewed the licensee’s procedure entitled “Commitment Management,” LS-AA-110, Revision 3, against NEI 99-04. In particular, in regard to managing a change or deviation from a previously-completed commitment, Subsection 4.5.1 specifically refers to the guidance of NEI-99-04. Attachments 1 and 2 of LS-AA-110, Revision 3, provide details regarding making changes to a commitment. In general, LS-AA-110, Revision 2, follows closely the guidance of NEI-99-04: it sets forth the need for identifying, tracking and reporting commitments, and it provides a mechanism for changing commitments. The licensee submits

its commitment revision report to the NRC biennially. There are no changes to the regulatory commitments that have been made during years audited by the NRC staff.

In LS-AA-110, Section 3, the licensee states that the Site Vice President has overall responsibility for the commitment tracking program. Licensing director/regulatory assurance managers designate the commitment tracking coordinators that are responsible for ensuring that commitments are properly captured in a commitment tracking database (CTD). The NRC staff reviewed procedures LS-TM-110-1003, "Commitment Tracking Program for Use with Lotus Notes," and LS-AA-110-1001, "Commitment Tracking Program T&RM for Use with Passport," that describe the licensee's commitment tracking programs and establish the responsibilities, authorities, processes, and organizational interfaces for tracking and assuring compliance with the regulatory commitments.

As set forth in Section 2.1 above, the NRC staff found that the licensee had properly addressed each regulatory commitment selected for this audit. As a result of this review of the licensee's information, as well as information from other sources, the NRC staff found no reason to differ from the licensee's reported status of the audited commitments. Therefore, the NRC staff surmises that the procedures used by the licensee to manage commitments are appropriate and effective.

### 3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) the licensee had implemented or is tracking for future implementation regulatory commitments; and (2) the licensee had implemented an effective program to manage regulatory commitment changes.

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

D. Distel

Principal Contributor: F. E. Saba

AUDITED TMI-1 COMMITMENTS  
(2000 THROUGH 2005)

<b>TMI-1 Submittal</b>	<b>Submittal Date</b>	<b>NRC TAC No.</b>	<b>Summary of Commitment</b>	<b>TMI-1 Tracking Number</b>	<b>Implementation Status</b>
5928-05-20102	May 03, 2005	MB6475 MC7001	The proposed TMI-1 Updated Final Safety Analysis Report (UFSAR) updated wording will be implemented and posted against the TMI-1 UFSAR, and then incorporated into the subsequent UFSAR.	AR00180733-09	Complete
5928-05-20102	May 03, 2005	MB6475 MC7001	Tubes with circumferential indications in the kinetic expansions' required lengths will be removed from service upon detection - including circumferential indications that were detected during prior 1997 through 2003 outage examinations that remain in service in the kinetic expansions' required lengths.	AR00180733-09	Complete  Final ECR #02-01121, Revision 2, Pages 4 and 27
5928-05-20102	May 03, 2005	MB6475 MC7001	Implement 100% examination scope of in-service kinetic expansions each refueling outage.	AR00180733-09	Complete  Final ECR #02-01121, Revision 2, Page 4
5928-05-20102	May 03, 2005	MB6475 MC7001	Any tubes with flaws detected in the sleeves, or in the parent tube adjacent to the sleeve between the lower sleeve end and the parent tube kinetic expansion transition, will be plugged-on-detection.	AR00180733-09	Complete  Final ECR #02-01121, Revision 2, Pages 23 and 42
5928-03-20148 RS-03-146	August 06, 2003	MB9620	Licensed operator requalification training is in progress and includes enhanced emergency core cooling system (ECCS) throttling criteria. All licensed operators will complete classroom training.	AR00166130-05 (5828-03-20148)	Complete
5928-03-20148 RS-03-146	August 06, 2003	MB9620	The plant will improve the containment closeout inspection procedure to specifically address dirt, dust, and small debris accumulation.	AR00166130-05 (5828-03-20148)	See AR00443432

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-03-20148 RS-03-146	August 06, 2003	MB9620	The plant will develop a specific procedure for cleaning and inspecting the floor drains in containment and will coordinate this work with the containment closeout procedure.	AR00166130-07 (5828-03-20148)	Complete Procedure 661-OPS-4550-03, Revision 1 and Operating Procedure Number 1101-05, Revision 4
5928-05-20223	August 18 2005	MB9620	TMI-1 will revise the site emergency operating procedures (EOP) to incorporate interim measures to include initiating borated water storage tank (BWST) refill after switch-over to recirculation from the containment sump.	AR0282077-13 (5828-05-10223)	Complete
5928-05-20223	August 18 2005	MB9620	TMI-1 will develop a written guideline that will cover re-injecting additional inventory from the BWST. This will include guidance for injecting more than one BWST volume from a refilled BWST or for injecting alternate water sources.	AR0282077-14 (5828-05-10223)	Supplemented by September 26, 2005 letter commitment
5928-05-20269	September 26, 2005	MB9620	In response to Bulletin 2003-01, TMI-1 will develop a written guideline that will cover re-injecting additional inventory from the BWST. This will include guidance for injecting more than one BWST volume from a refilled BWST or for injecting alternate water sources.	AR0282077-14 (5828-05-10269)	Complete ER-TM-TSC-1018, Revision 0 Note: The cited procedures is annotated (marked with CM-1).
5928-05-20076 RS-05-021	March 7, 2005	MC4724	If a strainer modification is required, TMI-1 will complete a preliminary debris loss analysis by September 1, 2005. The final debris head loss analysis will be completed as part of the strainer modification in accordance with the NRC schedule for GSI-191 resolution, and this analysis will include any additional impact found in the containment walkdown to be performed in November 2005.	AR00282077-08 AR00282077-09 AR00282077-10 (5828-05-20076)	In progress: Scheduled completion date December 31, 2007 Calculations completed Walkdown completed

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-05-20249 RS-03-116	September 1, 2005	MC4724	The recirculation function for the ECCS and the building spray (BS) system for TMI-1, will be in compliance with the regulatory requirements section of the subject generic letter under debris loading conditions by December 31, 2007.	AR00282077-19 (5828-05-20249)	In progress: Scheduled completion date December 31, 2007
5928-05-20249 RS-03-116	September 1, 2005	MC4724	Overall completion of the downstream effects evaluation, including the fuel impact under the current WCAP guidance, will occur by January 31, 2006.	AR00282077-20 (5828-05-20249)	In progress when audited: Scheduled completion date January 31, 2006
5928-05-20249 RS-03-116	September 1, 2005	MC4724	The chemical effects evaluation (excluding vendor testing) will be completed by January 31, 2006 for TMI-1.	AR00282077-23 (5828-05-20249)	In progress when audited: Scheduled completion date January 31, 2006
5928-05-20249 RS-03-116	September 1, 2005	MC4724	TMI-1 will validate that adequate margin exists to bound the impact of chemical effects once the vendors' tests results to quantify chemical debris effect on head loss have been published. AmerGen will update the TMI-1 NRC Project Manager with this scheduling information when the vendors have formulated their testing schedule.	AR00282077-26 (5828-05-20249)	In progress: Scheduled completion within 3 months after vendor test results are published
5928-04-20162	October 20, 2004	MC4904	TMI-1 administrative controls will require: that qualified personnel be designated; that required tools or equipment be identified and staged; and that required guidance be provided to ensure that, in the event of a fuel handling accident inside containment, containment equipment hatch closure is achieved within 45 minutes following an evacuation of the containment. Such prompt closure methods need not completely block the equipment hatch opening or be capable of resisting pressure.	AR00235958-5	Complete  Procedure 1101-3, Sections 7.3.1.6.1 and 7.3.1.6.2

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-04-20162	October 20, 2004	MC4904	TMI-1 will have procedures in place, which will require operation of the Reactor Building Purge Exhaust System and bypassing of the Reactor Building Purge High Radiation isolation signal whenever irradiated fuel movement is in progress and containment integrity is not maintained. Operation of the Reactor Building Purge Exhaust System is a contingency action, which will decrease doses even further by drawing any release from a postulated fuel handling accident in the proper direction such that it can be treated and monitored.	AR00235958-5	Complete  Procedure 1101-3, Section 7.3.1.6.3 OP-TM-823-408, Section 4.3 Procedure 1505-1, Datasheet 1, Item F
5928-04-20162	October 20, 2004	MC4904	TMI-1 will have procedures in place which will require the placement of continuously-operated particulate and radioiodine air sampling equipment inboard of the open containment equipment hatch opening during fuel loading and refueling activities.	AR00235958-5	Complete  Procedure 1101-3, Section 7.3.1.6.4
5928-05-20253	September 19, 2005	MC4904	Procedural controls will ensure that during the movement of irradiated fuel the equipment hatch/missile shield area will be manned 24 hours/day, 7 days/week in support of the outage unless the equipment hatch is closed and four bolts are installed.	AR00235958-12	Complete  Procedure 1101-3, Section 7.3.1.6.2
5928-05-20253	September 19, 2005	MC4904	Complete permanent installation of steel plate to the lower-most missile shield carriage area. The added steel plate will cover the area where grating is currently installed.	AR00235958-13	Complete  A walkdown performed at 14:00 on October 25, 2005 found the installation of structural components met ECR 05-00382 requirements.

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-05-20253	September 19, 2005	MC4904	Prior to initial use of this Technical Specification, TMI-1 will demonstrate that the 45-minute closure duration is achievable.	AR00235958-14	Complete  Procedure MA-TM-156-900, Revision 0 and W/O C2010899
5928-05-20253	September 19, 2005	MC4904	<p>TMI-1 procedures will include the following requirements to ensure that General Design Criterion (GDC)-64 Ti R16 requirements will continue to be met during the movement of irradiated fuel:</p> <ol style="list-style-type: none"> <li>1) If the reactor building equipment hatch is removed (open), then place the purge system in operation and control the air flow at the hatch so that the prevailing continuous direction of air flow is into the reactor building.</li> <li>2) If the condition, as described in Item 1 above, cannot be maintained, then fuel handling operations will be terminated until the reactor building equipment hatch is closed or purge is restored.</li> <li>3) Whenever the purge system is operating, then ensure purge exhaust radiation monitor is operable or obtain periodic samples as currently specified in the Offsite Dose Calculation Manual.</li> <li>4) Whenever the hatch is open, position a portable radiation monitor at the reactor building equipment hatch opening.</li> <li>5) If the purge system is operated with the reactor building equipment hatch open, then bypass the reactor building purge exhaust high radiation interlock.</li> <li>6) Prior to initiating irradiated fuel movement with the reactor building equipment.</li> </ol>	AR00235958-5	Complete  Requirements 1, 2 & 4 in Procedure 1101-3 Requirements 3 & 5 in OP-TM-823-408 Requirement 6 in Procedure 1505-1

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-02-20152 (LER 2002-002-00)	July 26, 2002		Establish a specification for contact area between the upper spring washer and spring. The specification will be established prior to the next refueling outage.	AR 00110749-17	Complete  Specification SP- 1101-12-020, Revision 8, Section 4.8.2
5928-02-20152 (LER 2002-002-00)	July 26, 2002		The rebuilt valve will be retested after one round trip of normal shipping prior to use.	AR 00110749-18	Complete Subject pressurizer safety code satisfactorily tested on November 18, 2002.
5928-02-20062 (LER 2002-001-00)	March 15, 2002		Update drawings/vendor manual to reflect actual configuration.	AR00090391-16	Complete ECR 02-00504 was issued to update drawings and revise vendor manual VM-TM-0172
5928-02-20062 (LER 2002-001-00)	March 15, 2002		Complete the installation of 480/460 VAC transformers for each inventor.	PIMS C2004-237, 299, 300, 301, 302 (A2024085)	Complete
5928-02-20062 (LER 2002-001-00)	March 15, 2002		Verify the current procurement process will prevent this type of error (the original design of power supplies to the vital power buses did not meet certain design specifications.)	AR00090391-16	Complete The current procurement process provides an improved technical review prior to order, access to the evaluated vendor's list and improved quality assurance inspection.

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-01-20283	October 18, 2001	MC2336	<p>The following commitment will be included as a Category A commitment in the "Plan for the Long Range Planning Program for the Three Mile Island Nuclear Station -Unit 1" as provided in TMI-1 Operating License Condition No. 2.c(9).                      "A minimum Reactor Coolant System (RCS) flow rate of 105.5% of design flow (105.5% of 352,000 gpm) is specified to offset potential mixed core DNBR [departure from nucleate boiling ratio] penalty for TMI-1 Cycle 14 and any subsequent cycle. This commitment expires when a mixed core penalty is no longer required or NRC-approved statistical core design methods are utilized which provide an alternative means of addressing transition core effects."</p>		<p>This commitment was removed by Amendment No. 250, issued July 7, 2004.</p>
5928-01-20255	September 17, 2001	MB1051	<p>TMI-1 administrative controls will require: that qualified 1 R14 personnel be designated; that required tools or equipment be identified and staged; and that required guidance be provided to ensure that containment closure is achieved within 45 minutes following the decision to isolate containment.</p>		<p>Complete                      Procedure MA-TM-156-900, Revision 0 and W/O C2010899</p>
5928-01-20255	September 17, 2001	MB1051	<p>The following commitment will be included as a Category A 1 R14 commitment in the "Plan for the Long Range Planning Program for the Three Mile Island Nuclear Station -Unit 1" as provided in TMI-1 Operating License Condition No. 2.c(9), prior to the start of the TMI-1 1R14 outage.                      "When handling irradiated fuel in the reactor building, a shiftly check and a daily verification (once per 24 hours) shall be performed to confirm that the Fuel Transfer Canal water level is &gt;23 feet above the reactor vessel flange (Technical Specification 3.8.11)."</p>		<p>Complete                      AmerGen Submittal 5928-01-20342, dated December 13, 2001</p>

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-01-20108	April 11, 2001	MB1013	<p>Subsequent to the TMI-1 14R refueling outage fuel assembly Post Irradiation Examinations (PIE), AmerGen will provide the NRC the results of the PIE data obtained for the M5 lead test rods. At that time AmerGen will also provide to the NRC confirmation of the results of the TMI-1 Cycle 14 specific fuel rod design analysis for the M5 lead test rods performed to determine acceptability for use in Cycle 14. If fuel rod behavior, as observed in the PIE, is not as expected or if analysis does not confirm fuel rod design criteria are met, then the M5 lead test rods will not be used in Cycle 14.</p> <p>AmerGen will also provide the NRC the data obtained from PIE performed on the M5 lead test rods at the conclusion of TMI-1 operating Cycle 14.</p>	ETTS Task Nos. 40816 and 40816-1	Complete AmerGen submittal 5928-02-20120, dated May 20, 2002 (refueling outage 14) AmerGen submittal 5928-05-20074, dated March 15, 2005 (refueling outage 15)
5928-00-20280	September 8, 2000		Ensuring the adequacy of the acceptance criteria for the daily operability surveillance check of the makeup tank pressure instrument.	5928-00-20280.001	Complete Commitment added to Technical Specification 4.1 bases (Page 4-2)
5928-04-20095	April 23, 2004	MC2760	AmerGen will develop and maintain contingency plans for obtaining and analyzing highly radioactive samples from the RCS, containment sump, and containment atmosphere. The contingency plans will be contained in the TMI-1 chemistry procedures and implementation will be completed with the implementation of the license amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.	AR00220236-11 AR00220236-13	Complete Chemistry procedures N1830 N1831

TMI-1 Submittal	Submittal Date	NRC TAC No.	Summary of Commitment	TMI-1 Tracking Number	Implementation Status
5928-04-20095	April 23, 2004	MC2760	The capability for classifying fuel damage events at the alert level threshold will be established for TMI-1 at radioactivity levels of 300 micro CVcc dose equivalent iodine. This capability will be described in the TMI-1 emergency plan and emergency plan implementing procedures and implementation will be completed with the implementation of the license amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	AR00220236-08	Complete Capability was identified in the TMI-1 emergency plan.
5928-04-20095	April 23, 2004	MC2760	AmerGen has verified that it has established the ability to assess radioactive iodines released to offsite environs. The capability for monitoring iodines will be maintained within the TMI-1 emergency plan and emergency plan implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.	AR 00220236-15	Complete Capability was identified in the TMI-1 emergency plan.
5928-04-20065	October 20, 2004	MC2760	The as-found and as-left values will continue to be recorded and reviewed for consistency with the assumptions of the surveillance interval extension analysis. The review will verify the test results meet acceptance criteria. Out-of-tolerance results will be evaluated to determine if they meet the requirements outlined in BAW-10167.	AR 00235945-03 AR 00235945-06	To be completed by February 28, 2006 (not completed during the audit)