

July 3, 2006

Mr. Karl W. Singer
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Executive Vice President
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6A Lookout Place
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Chattanooga, TN 37402-2801

SUBJECT: WATTS BAR NUCLEAR PLANT, UNIT 1 — AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. MD1184)

Dear Mr. Singer:

An audit of the Tennessee Valley Authority commitment management program was performed at the Watts Bar Nuclear Plant (WBN) site on May 2 - 4, 2006. Based on the audit, the Nuclear Regulatory Commission (NRC) staff concludes; (1) WBN has established an effective commitment management program, (2) WBN has implemented NRC commitments on a timely basis, and (3) WBN has implemented an effective program for managing NRC commitment changes.

Details of the audit are described 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) 415-1364.

Sincerely,

/RA/

Douglas V. Pickett, Senior Project Manager
Plant Licencing Branch II-2
Division of Operating Reactor Licencing
Office of Nuclear Reactor Regulation

Docket No. 50-390

Enclosure: As stated

cc w/enclosure: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION (NRR)

REGULATORY COMMITMENTS MADE BY THE LICENSEE TO

THE NUCLEAR REGULATORY COMMISSION (NRC)

WATTS BAR NUCLEAR PLANT UNIT 1

DOCKET NO. 50-390

1.0 INTRODUCTION AND BACKGROUND

NRR Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," was published on May 27, 2003, and 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 (ADAMS Accession Number ML022750041). LIC-105 provides the NRC staff and its stakeholders with a common reference for handling regulatory commitments made by licensees for 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 PROCEDURE AND RESULTS

Since no such audit was performed before the issuance of LIC-105, the NRC staff defined the period covered by this audit to go back approximately 3 years. The audit was performed at the Watts Bar Nuclear Plant Licensing Office in Spring City, Tennessee, between May 2 and May 4, 2006.

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 activities. The staff examined a sample of completed commitments to ensure that they were implemented in a manner that satisfied both the action committed to and the overall intent of the commitment. The staff's findings are summarized in the attached table.

2.2 Verification of Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is the licensee's performance related to implementing controls for modifying or deleting commitments made to the NRC. The staff examined the licensee's commitment tracking system and the NRC commitment management procedures.

When the licensee incorporates commitments into plant procedures, they include the commitment tracking number within the procedure. If the commitment is to be deleted from plant procedures, the licensee's procedures direct their staff to use the Commitment Evaluation Form, which is similar to that of NEI-99-04.

In addition, the licensee submits a Commitment Summary Report to the NRC every 18 months that captures the modifications and/or deletion of commitments and provides an explanation of the licensee's basis for these changes. There were no changes to commitments made in the 3-year period over which the audit was performed; however, the staff did examine a sample of commitment changes made in 2001 and 2002, and determined that the modification and/or deletion of commitments were made in accordance with the licensee's programs and procedures. The majority of the changes made were deletions based on the incorporation of the action into owner-controlled documents such as the UFSAR. Furthermore, the licensee's technical evaluations adequately justified the change, and the NRC was informed of commitment changes that have safety or regulatory significance. The licensee's procedures for changing commitments follow NEI-99-04.

3.0 CONCLUSION

Based on the above, the NRC staff concludes that; (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

Rebecca Mays
Jim Sanders

Principal Contributor: Samantha Crane, NRR

Date: July 3, 2006

Attachment: As stated.

AUDIT OF TENNESSEE VALLEY AUTHORITY MANAGEMENT OF

REGULATORY COMMITMENTS

AT WATTS BAR NUCLEAR PLANT

PERFORMED DURING MAY 2 THROUGH MAY 4, 2006

LIST OF COMMITMENTS INCLUDED IN AUDIT

Item No.	Commitment No.	Commitment Letter/Date	Description of Commitment	Status	Method of Closure
1	NC0030028003	WBN-TS-03-11 04/22/03	In order to verify the pipe is full of water, 1-SI-63-10A will include the following provision: perform an ultrasonic inspection following the filling and venting operation of the safety injection hot leg injection lines at the conclusion of the refueling outage to verify the line is filled	closed	The following was added to 1-SI-63-10-A under Section 4.2 of the procedure: NOTE 3 In order to fulfill NRC commitment NCO030028003, the UT option of Appendixes I and J must be performed at the conclusion of the Fall 2003 refueling outage to verify the safety injection hot leg injection lines are filled with water. This commitment was fulfilled by documentation of UT testing in Appendixes I and J of WO 03-017742-000.
2	NC0030048003	BL 2003-01 08/08/2003	TVA will perform a licensing evaluation to consider pre-emptive actions that delay or reduce ECCS and CSS flow during LOCA. A licensing evaluation will be completed by December 15, 2003.	closed	The required licensing evaluation was performed. Based on the evaluation, changes to the plant design or operating procedure which implement pre-emptive actions that delay or reduce ECCS and CSS flow during a loss of coolant accident cannot be made under 10CFR50.59. A licensing Amendment Request would be required. This evaluation was completed on 12/8/2003.

Item No.	Commitment No.	Commitment Letter/Date	Description of Commitment	Status	Method of Closure
3	NC0030059001	GL 2003-01 08/08/2003	TVA will submit the final response to Generic Letter (GL) 2003-01 within 90 days of completion of the unfiltered inleakage testing for SQN and WBN	closed	Submittal was prepared and submitted on 8/4/2004.
4	NC0040001001	GL 95-05 01/15/2004	TVA will provide the results of the metallurgical examination from the two removed steam generator tubes as soon as it becomes available	closed	Westinghouse report was submitted to [Watts Bar] Licensing for submittal to the NRC. The report contained the destructive examination results from the two tubes pulled from Watts Bar SG.
5	NC0040003003	TS-03-16 04/07/2004	The UFSAR will be revised to require the emergency diesel generator jacket water heat exchanger to be cleaned once during spring, within a time frame no earlier than March 1 but no later than June 30	withdrawn	The Licensing Amendment Request was Withdrawn
6	NC0040003004	TS-03-16 04/07/2004	The UFSAR will be revised to address single-train RHR cooldown restrictions for ERCW temperatures of 88 degrees F which consist of five hour limitations on SFP cooling isolation and a requirement to secure the remaining reactor coolant pump within 25 hours after shutdown	withdrawn	The Licensing Amendment Request was Withdrawn
7	NC0040017001	BL 2004-01 07/27/2004	TVA will perform a bare metal visual (BMV) inspection of the upper pressurizer Alloy 600 locations (safety, spray, and relief safe-ends) during the upcoming WBN Unit 1 6 RFO in the Spring of 2005 (WO 04-0820587-000)	closed	The examinations were scheduled in the site ISI Program, 1-TRU-0-10, Appendix J, Section 4.0 WO 04-820587-000. Visual inspection of the pressurizer safety, spray, and relief nozzle safe-end welds was performed during U1C6 RFO. The inspection was performed in accordance with NDE procedure N-VT-19 under WO 04-820587-000. The examinations were acceptable.

Item No.	Commitment No.	Commitment Letter/Date	Description of Commitment	Status	Method of Closure
8	NC0040019001	TS-03-12 08/19/2004	TVA intends to make a Regulatory Commitment to revise Section 7.7.1.3.2, "Main Control Room Rod Position Indication," of the Update Final Safety Analysis Report (UFSAR). The proposed revision will discuss the rod control system monitoring process and will clarify that while the alternate monitoring is in use, the operation of the system will be periodically verified through the implementation of SR 3.1.5.2, 3.2.1.1, and 3.2.2.1.	closed	Incorporated into UFSAR.
9	NC0040023001	WBN-TS-04-15, TSTF 391 R1 11/08/2004	TVA will revise the UFSAR to add a regulatory commitment to provide the NRC using an industry database the operating data (for each calendar month) that is described in GL 97-02 by the last day of the month following the end of each calendar quarter. The commitment will be based on use of an industry database (e.g., the industry's CDE program). This commitment will prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC.	closed	Incorporated commitment into Chapter 1 of the UFSAR.
10	NC0050012001	08/26/05	TVA intends to revise the UFSAR to document that a revision will be made to the site instruction that controls excavation to ensure that the abandoned liquid effluent line will not be affected by the implementation of future plant modifications	closed	The required revision to UFSAR was processed as Package 1885. This change was incorporated in the the Living FSAR on 02/28/2006.