Table 1 – Audited Closed Commitments

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Action Tracking Number	Document (Date)	:Commitment:Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment Disposition (adequate, inadequate)
475502	RS-05-078 (06/15/05)	AMD 231/227: Implement optima2 Technical Specification (TS) change for Unit 1.	Completed 5/17/07, change was incorporated into the Control Room (CR) TS.	Adequate: This is not a regulatory commitment per LS-AA-110. However, since the licensee considered this to be a regulatory commitment, it was noted that the due date changed without NRC notification. As described in LS-AA-110, "Timely notification should normally be made within 30 days or before the committed completed date whichever is sooner." Additionally, LS-AA-110, Section 4.4.4 states that all due date extensions should be submitted to the NRC in the annual commitment change summary report and does not differentiate between docketed due dates and due dates assigned by the functional area manager.
320034	SVP-05-023 (04/01/05)	Licensee Event Report (LER) 1-05-01: Install modification for single failure vulnerability	Completed during Q1R19 (5/19/07).	Adequate: This is not a regulatory commitment. As stated in LS-AA-110, "for corrective actions identified in a Notice of Violation or Licensee Event Report (LER), the specific method(s) used to restore compliance with an obligation is not normally considered a Regulatory Commitment. The regulatory commitment in this instance is the promise to restore compliance with the violated obligation."
320035	SVP-05-022 (04/01/05)	Non-standard repair request: Code Compliant repair of 1B1 heater	Completed (05/17/07) during Q1R19 documented in WO 00969089.	Adequate: This is not a regulatory commitment. Per LS-AA-110, a regulatory commitment is "an explicit written, docketed statement to take a specific action agreed to or volunteered by Exelon/PSEG Nuclear and submitted in formal regulatory correspondence." The commitment in this case is an Illinois state action and not an NRC.
363382	SVP-05-061 (08/16/05)	LER 254/05-005: Corrective action is to install digital electro-hydraulic control (EHC) on Unit 1 to address the non-fault tolerant character of the system.	Completed during Q1R19 and verified EHC unit installation in control room.	Adequate: This is not a regulatory commitment per LS-AA-110. As stated in LS-AA-110, "for corrective actions identified in a Notice of Violation or Licensee Event Report (LER), the specific method(s) used to restore compliance with an obligation is not normally considered a Regulatory Commitment. The regulatory commitment in this instance is the promise to restore compliance with the violated obligation."

Name of the second	Table 1 – Audited Closed Commitments (continued)							
Action Tracking Number	Document (Date)	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment Disposition (adequate inadequate)				
468852	RS-05-075 (06/15/05)	AMD 230/225: Implement TS amendment dealing with feedwater system and main turbine high water level trip instrumentation.	Completed during Q1R19.	Adequate: This is not a regulatory commitment per LS-AA-110. A license amendment is effective as of the date of the amendment. The licensee is given a certain time frame to complete its implementation of the amendment as part of its license. Implementation is a legally binding requirement and not a regulatory commitment.				
125209	SVP-02-059 (04/13/07)	Exemption (09/16/02): Performance of the 3 rd interval inspections until completion of the Unit 1 refueling outage in January 2005. Commitment as described in commitment tracking database (CTD) (125209-2): (1) Perform inspections prior to startup from Q1R18. (2) Perform source term reduction during Q1R18. (3) Verify ISI program has controls to ensure examinations are repeated during 4 th 10-year interval.	Inspections completed (04/09/05) during Q1R18. Commitment as described in CTD (125209-2): (1) Verified examination records per ISI post outage report. (2) No indication of completion of commitment. (3) No indication of completion of completion of completion of semitiment as stated.	Inadequate: This is not a regulatory commitment, it is an obligation. LS-AA-110, states that an obligation is "any condition or action that is a legally binding requirement imposed through a rule, regulation, order, technical specification, or license condition." In this case, the licensee was granted an exemption from extension of the completion date was until January 2005. However, the refueling outage was later changed to April 2005 without subsequent notification to the NRC or approval. This item will be followed up by the NRC staff, as appropriate.				
153288	RS-00-0167 (12/27/2000)	AMD 202/198: Extended Power Uprate (EPU) Safety Evaluation states: (1) (a) Revise the fluence predictions using an acceptable methodology before the end of the first cycle of EPU operation before startup from Q2R17 (Q1R18) or (b) to provide justification of continued use of existing fluence estimate. (2) If the fluence is projected to increase, the licensee must reevaluate the P-T limits and the RV integrity issued before the vessel fluence is predicted to exceed 4.5E17 n/cm2.	For Unit 1, (1)(b) completed (05/27/03) based on information from GE-NE-0000-0002-9600-02R1 and GE-NE-0000-0002-9600-03R2. For Unit 2, (1)(b) completed (01/14/2004) with submittal of RS-03-113 by letter dated 06/06/03. Verified letter submitted to NRC dated 06/06/03.	Adequate: The CTD document states, in accordance with the procedure, "this item cannot be closed until there is formal documentation that the TS submittal is not necessary, or until the TS submittal is made." However, AT153288-01 was closed on 5/23/03, with the statement "corporate licensing to submit letter to NRC stating no change required," prior to the submittal of the above stated closeout document on 06/06/03.				

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Action	Document	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment
Tracking	(Date)			Disposition (adequate inadequate)
Number				
264849	NEIL Report	NEIL Report:	(264849-3) Completed	Adequate: This is non-regulatory commitment. As
	(10/05-7/04)	(264849-3) Review lightning protection	walkdown (2/16/05) and	defined in LS-AA-110, a non-regulatory commitment is
		outside protected area.	reviewed completion of	"an explicit statement to take a specific action agreed to
		(264849-5) Provide plan for removal of	AT 264849 -03-01.	or volunteered by Exelon/PSEG to an external
		EHS side stream filters.	(264849-5) Completed	organization." As such it should not be marked as a
		(264849-6) Revise QCEPM 0700-22 to	(2/15/05) created	regulatory commitment (RCMT).
		add the warehouses lightning	WO7670337 and	
		protection	WO767039. Reviewed	
			IR284720 and	
			IR284092 completion.	·
Į.			(264849-6) Completed by	
1			approval and	
			implementation of	
			QCEPM0700-22 Rev. 2	
346390	RS-04-141	AMD 226/221: Relocation of	Prepared QC-TRM-05-008	Adequate: Commitment was labeled in CTD as
	(09/15/04)	hydrogen/oxygen monitors to the Technical	and completed (10/26/05) the	"commitment to maintain hydrogen monitoring unit,"
		Requirements Manual (TRM).	relocation to TRM. Verified	however, the body of the CTD contained the
		(1) EGC will maintain the capability of	hydrogen and oxygen	information regarding the second commitment for
}		monitoring containment hydrogen	monitors specifications have	oxygen monitors. Additionally, the TRM and TRM
		for design basis accidents (maintain	been removed from TS and	bases did not contain reference to the regulatory
		hydrogen monitors within its	incorporated into the TRM.	commitments as described in LS-AA-110. However,
1		TRM).		the TRM Bases included a reference to the amendment.
		(2) EGC will maintain the capability of		
		monitoring containment oxygen to		
		verify the status of the inerted		
		containment (maintain oxygen		
		monitors within its TRM).		

	Table 1 – Audited Closed Commitments (continued)							
Action	Document	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment				
Tracking	(Date)			Disposition (adequate inadequate)				
Number								
225842	SVP 04-056	LER 2-04-003: SCRAM during turbine	(1) Completed (09/09/04)	Adequate: This is not a regulatory commitment per				
]	(05/28/04)	testing of the thrust bearing wear detector	QCOS 5600-09, Rev. 3 and	LS-AA-110. As stated in LS-AA-110, "for corrective				
		(TBWD): (1) The operations turbine test of	QCOS 5600-10, Rev. 4,	actions identified in a Notice of Violation or Licensee				
		the TBWD was revised to provide a positive	Reopened when procedures	Event Report (LER), the specific method(s) used to				
		means (lead lift) of inhibiting a turbine trip	moved to QCOS 5600-05.	restore compliance with an obligation is not normally				
		during TBWD testing. (2) The	Rev. 5. (2) Review	considered a Regulatory Commitment. The regulatory				
		implementation of Instrument Maintenance	completed (11/30/04). (3)	commitment in this instance is the promise to restore				
		(IM) procedures will be reviewed for other	Completed (3/21/05).	compliance with the violated obligation."				
		situations in which the procedures are used	(4) Modification completed					
		interactively with procedures from another	(7/12/05) and (09/12/05).					
		department to ensure the IM procedure is		·				
		being properly implemented. (3) The work	Verified commitments in					
		frequency codes that determine the local	procedures QCIPM 5600-07,					
		adjustment procedures are performed will	QCOS 5600-05, and QCIPM					
		be revised such that the procedures are	5600-01, Rev. 4.					
		appropriately performed at the end of the						
		outage. (4) Modifications will be installed						
		to provide a positive means to prevent trips						
450040	DG 04 050	during TWBD testing.		10				
479048	RS-06-058	EPU Commitments:	(1) Completed dryer	Adequate. LS-AA-110-1001 states "an				
	(04/14/06)	(1) QCNPS U2 will remain at pre-EPU	inspections (05/11/06).	implementation statement shall be entered into the ATI				
		power level until the QCNPS U1	Reviewed WO 916747-01	completion notes (or in progress notes, if referenced in				
		steam dryer is inspected during the	documenting completion	the completion notes section). This statement shall				
İ		planned May 2006 QCNPS U1	of inspections.	contain information which clearly indicates what action				
		outage. The QCNPS U1 steam	(2) Completed (4/18/06) with	was taken and must reference the implementing				
		dryer inspection scope will consist of, as a minimum, those areas	incorporation into	document(s)." For the second commitment, the				
		1	Standing Order 06-08. This cannot be verified	implementing document was Standing Order 06-08				
		necessary to confirm conclusions	4	which was not retained once it expired.				
		reached regarding the cause of the QCNPS U2 steam dryer damage	since this standing order has since been deleted.					
		described in our April 10, 2006	has since been defeted.					
		conference call.						
	1	(2) Incorporate RS-06-058 into						
		Standing Orders.						
<u></u>	<u> </u>	Standing Orders.	1					

Action & Tracking	Document (Date)	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment Disposition (adequate: madequate)
Number				
512802	NPDES Permit IL005037 (7/16/06)	Special Conditions 6B (A-F): (A) Continuously monitor intake, discharge, and receiving water temperatures and to visually inspect intake and discharge areas at least 3 times daily to assess any mortalities to fish and other aquatic life, (C) Prepare a study plan within 3 days of beginning date of provisional variance, (D) Reporting requirements for unusual conditions; and (F) Develop and implement a response and recovery plan to address any adverse environmental impact due to thermal conditions.	(A) Completed (08/26/07) with update to CY-QC-110-640 (TIC 1525) and EN-QC-402-0005 (TIC 1526); (C) Completed (08/02/06) letter PM-06-016; (D) Extended to 09/01/06 to document whether any unusual conditions did or did not occur during provisional variance period. Completed (08/28/06); and (F) CY-QC-110-640 (TIC 1525) updated (7/19/06) and no variances (9/20-24/06).	Adequate: The commitment as stated is a non-regulatory commitment. As defined in LS-AA-110, a non-regulatory commitment is "an explicit statement to take a specific action agreed to or volunteered by Exelon/PSEG to an external organization." As such it should not be marked as a regulatory commitment (RCMT).
506478	NOV (06/29/06)	Response within 30 days of NOV.	Response sent to NRC by letter dated 07/26/06 (SVP-06-078).	Adequate: This is not a regulatory commitment. Per LS-AA-110, the regulatory commitment is the licensee's promise to restore compliance with a violated obligation by a certain date. The response within 30 days is an obligation required by the NOV.

Action Document Commitment Summary/Description: Tracking (Daie) Number 83-06-071 (05/17/06) RS-06-071 (05/17/06) RS-06-071 (05/17/06) RS-06-072 (05/17/06) RS-06-073 (05/17/06) RS-06-073 (05/17/06) RS-06-074 (05/17/06) RS-06-075 (05/17/06) RS-06-075 (05/17/06) RS-06-076 (05/17/06) RS-06-077 (05/17/06) RS-06-077 (05/17/06) RS-06-077 (05/17/06) RS-06-078 (05/17/06) RS-06-078 (05/17/06) RS-06-078 (05/17/06) RS-06-078 (05/17/06) RS-06-078 (05/17/06) RS-06-079 (05/17		Table 1 – Audited Closed Commitments (continued)							
Number RS-06-071	Action	Document	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment				
Additionally	Tracking	(Date)			Disposition (adequate: madequate)				
Od/17/06 Performed on the automatic load tap changers (LTCs) to ensure proper operation: 2 years – LTCs verified for proper timing and sequencing of operation. 6 years – Perform preventative maintenance consisting of inspection and functional testing of LTCs. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment to after the CTD completion date. Per LS-AA-110-1001, Section 4.3 states, "for commitments involving implementation of procedure/guideline is approved." Additionally, the due date for this item was extended several times (after approval of the amendment) without management approval "and" an assessment should also be documented in the ATI, as appropriate, addressing the need for interim corrective actions in order to justify the due date extension."	17.5								
OS/17/06 Performed on the automatic load tap changers (LTCs) to ensure proper operations 2 years – LTCs verified for proper timing and sequencing of operation. 6 years – Perform preventative maintenance consisting of inspection and functional testing of LTCs. Os/17/06 Perform preventative maintenance consisting of inspection and functional testing of LTCs. Perform preventative maintenance consisting of inspection and functional testing of LTCs. Perform preventative maintenance consisting of inspection and functional testing of LTCs. Perform preventative maintenance consisting of inspection and functional testing of LTCs. Performed on the automatic operation of LTCs are checked once at 2 year and 6 year intervals but do not capture the period beyond this initial period. The CTD shows the commitment was completed on 0/13/107 however SR0048840 stated that the predefines were completed 0/2/27/07 after the CTD completion date. Per LS-AA-110-1001. Section 4.3 states, "for commitments involving implementation of procedure/guideline is approved." Additionally, the due date for this item was extended several times (after approval of the amendment) without management approval and without an assessment. As described in LS-AA-110-1001, "once a due date is established for Regulatory Commitments, it can be extended only by obtaining successively high levels of management approval" and "an assessment should also be documented in the ATI, as appropriate, addressing the need for interim corrective actions in order to justify the due date extension." Sample	491292	RS-06-071	AMD 232/228: Periodic testing to be	Closed by Service Request	Adequate: The predefines developed only ensure that				
changers (LTCs) to ensure proper operation: 2 years – LTCs verified for proper timing and sequencing of operation. 6 years – Perform preventative maintenance consisting of inspection and functional testing of LTCs. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing commitment captured in service request. Verified installation of LTCs modification and testing of procedure/guidelines, the ATI shall not be closed until the procedure/guidelines is approved.'' Additionally, the due date for this item was extended several times (after approval of the amendment) without management approval and without an assessment. As described in LS-AA-110-1001, "once a due date is established for Regulatory Commitments, it can be extended only by obtaining successively high levels of management approval" and "an assessment should also be documented in the ATI, as appropriate, addressing the need for interim corrective actions in order to justify the due date extension.'' AMD 233/229: Process Commitment Change paperwork to eliminate commitment to change standby gas treatment (SBGT) in-place bypass leak test acceptance criteria from 1% to 0.5%. Verified installation of LTCs modification and testing of LTCs. Verified installation of LTCs modification and testing of LTCs. Verified installation of LTCs modification and testing of the meeting approval.'' Additionally, the due date for this item was extended several times (after approval and without an assessment, as described in LS-AA-110-1001, "once a due date is established for Regulatory Commitment can be extended only by obtaining successively high levels of management approval.'' Additionally, the due date for this item was extended several the precedure/guidelines, the ATI, as appropriate		(05/17/06)		0048540 to generate	the LTCs are checked once at 2 year and 6 year intervals				
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RS-05-114 (08/22/05) Commitment to change standby gas treatment (SBGT) in-place bypass leak test acceptance criteria from 1% to 0.5%. Commitment to change standby gas treatment (SBGT) in-place bypass leak test acceptance criteria from 1% to 0.5%. Verified commitment change paperwork Verified commitment change paperwork		(10/10/02)	Change paperwork to eliminate	(03/09/07) with commitment	commitment . The processing of commitment change				
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change the acceptance criteria to <0.05% within 6 months of NRC approval of amendments." The commitment as stated in RS-05-114 was not entered into the CTD, however, the licensee properly identified that a commitment change was needed and processed the		(08/22/05)	acceptance criteria from 1% to 0.5%.	Verified commitment change	as stated in RS-05-114, is "to submit a separate license				
months of NRC approval of amendments." The commitment as stated in RS-05-114 was not entered into the CTD, however, the licensee properly identified that a commitment change was needed and processed the			_	paperwork	amendment request to revise Dresden and Quad TS to				
commitment as stated in RS-05-114 was not entered into the CTD, however, the licensee properly identified that a commitment change was needed and processed the					change the acceptance criteria to <0.05% within 6				
commitment as stated in RS-05-114 was not entered into the CTD, however, the licensee properly identified that a commitment change was needed and processed the	1				months of NRC approval of amendments." The				
a commitment change was needed and processed the									
					the CTD, however, the licensee properly identified that				
change in accordance with LS-AA-110.	1				a commitment change was needed and processed the				
					change in accordance with LS-AA-110.				

		Table 1 - Audited Cit	sea Commitments (contil	nuea)
Action Tracking Number	Document (Date)	Commitment Summary/Description	Disposition & Verification	Auditor's Assessment of Regulatory Commitment Disposition (adequate inadequate)
315650	RS-04-062 (10/10/02)	AMD 224/219: Implement main steam line flow-high initiation of group 1 primary containment isolation system and control room emergency ventilation system isolation.	Completed (06/13/05) for Unit 1 with the creation of a separate commitment for Unit 2 (AT329254-01) that was completed 04/14/06.	Adequate: This is not a regulatory commitment. However, since this was treated as a commitment and the closure of this item did not follow the procedure as stated in section 4.2, "commitments may not be closed to other tracking programs." The commitment was closed to additional action tracking items and an engineering change (AT329254-01, AT227242, and EC 345323).
272009	RS-04-160 (10/21/04)	AMD 225/220: Regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in GL 97-02 "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter.	No commitment, as stated in RS-04-160, was entered in the CTD. However, there was a commitment created for the implementation of this amendment closed 6/17/05 to AT272009.	Inadequate: A regulatory commitment is made in the referenced document and has not been entered into the CTD. This is an example of discrepancies that can exist between corporate and site entries. Specifically, AT272009 states "create 1 AT to review applicable App B. procedures, determine if any need revision (initial review revealed no procedure changes needed), and write additional ATs for any revisions needed." No additional information is provided as indicated in LS-AA-110, Section 4.2.3. The commitment created for implementation of this amendment is not a regulatory commitment.
381250	RS-04-152 (10/11/04)	AMD 227/222: Procedures will be written in a manner that limits access to one Oscillation Power Range Monitors (OPRM) channel at a time. The system engineer will require a password to access the menu that allows changing of setpoints and parameters; this password is not distributed to non-engineering personnel. All procedures will contain a requirement to obtain and document an Operations Senior Reactor Operator's permission before accessing OPRM functions.	No commitment, as stated in RS-04-152, was entered in the CTD. However, there was a commitment created for implementation of this amendment closed 12/16/05 (AT381250).	Inadequate: A regulatory commitment is made in the referenced document and has not been entered into the CTD. Additionally, the commitment created for implementation of this amendment is not a regulatory commitment.

Table 1 Addited Glosed Communicities (Continued)							
Action Tracking Number	Document (Datë)	Commitment Summary/Description	Disposition & Verification :	Auditor's Assessment of Regulatory Commitment :: Disposition (adequate: inadequate)			
315234	RS-04-067 (04/30/04)	AMD 223/218: EGC and AmerGen will establish the TS Bases as adopted with the applicable license amendment.	No commitment, as stated in RS-04-07, was entered in the CTD. However, there was a commitment created for implementation of this amendment closed 3/27/05 (AT315234)	Inadequate: A regulatory commitment is made in the referenced document and has not been entered into the CTD. Again, the commitment created for implementation of this amendment is not a regulatory commitment.			
143425	SVP-03-034 (02/24/03)	90-day Post Outage Inservice Inspection letter: The evaluation concluded that the Core Spray and Jet Pump flaws are within acceptable limits and shall be reexamined after two cycles of operation (Q1R19).	Core spray piping welds and jet pumps were visually reinspected during Q1R19. Reviewed visual inspection results as documented.	Adequate. No comments.			

Table 2 – Audited Open Commitments

Commitment	Date and	Commitment	Auditor's Comments of Regulatory Commitment Disposition (adequate, inadequate)
Tracking	Document -	Summary/Description	
Number.			
(RCMT)			
574435 (01)	Biennial	Biennial Report Submittal 10	Inadequate: This is an obligation and not a regulatory commitment. As described in
	Report	CFR 50.59/72.48: Commitment	LS-AA-110 an obligation is "any condition or action that is a legally binding requirement
		to submit report and generate new	imposed through rule, regulation, order, technical specification, or license condition. As such, it
		commitment for report in 2 years.	should not be marked as a regulatory commitment.
543074 (03)	ANI	ANI Inspection Report: The	Adequate: This is a non-regulatory commitment. As defined in LS-AA-110, a non-regulatory
	(10/11/06)	station is continuing to pursue	commitment is "an explicit statement to take a specific action agreed to or volunteered by
		other options for mitigating the	Exelon/PSEG to an external organization." LS-AA-110 then gives examples of non-regulatory
		risk associated with a fire in the	commitments which include ANI.
		Mausoleum.	
576037 (03)	SA-07-01	NRC Security Advisory:	Adequate: This is not a regulatory commitment. As defined in LS-AA-110, a regulatory
	(06/26/07)	Licensees are requested to	commitment is "an explicit written, docketed statement to take a specific action agreed to or
		develop procedures and train	volunteered by Exelon/PSEG Nuclear and submitted in formal regulatory correspondence by
		applicable personnel in this	authorized management." In this case, the reference document listed in the AR does not meet
·		process. Specific procedures	this definition because the source document is not an Exelon created document. Additionally.
		QCOA 0010-20 and	this AR was created (01/06/07) prior to the issuance of SA-07-01 or Exelon's response, thus the
	Í	OP-AA-11-101-1004 are affected	creation of a commitment can not supersede the source document. With the issuance of
		by this request.	SA-07-01, the AR created would be more appropriate as discussed in LS-AA-110 as "an
			intentional undertaking to complete a specific action to address an NRC issue or concern."
363382 (04)	SVP-05-061	LER 254-05-005: Pursuing	Adequate: This is a not a regulatory commitment. As stated in LS-AA-110, "for corrective
, ,	(08/16/05)	installation of a digital EHC	actions identified in a Notice of Violation or Licensee Event Report (LER), the specific
		system. This change will address	method(s) used to restore compliance with an obligation is not normally considered a Regulatory
		the non-fault tolerant character of	Commitment. The regulatory commitment in this instance is the promise to restore compliance
		the system.	with the violated obligation."
364189 (03)	RS-05-101	Bulletin 2005-02: Revise	Adequate: This is a regulatory commitment. LS-AA-110, step 4.4.1 states that "dates for
	(08/17/05)	Emergency Plan to include	completing commitments should be determined by the responsible Functional Area Manger
·		provisions for drill and exercises	(unless a predetermined date already exists) and entered into the CTD" and step 4.4.4 states "for
		using terrorist-based events as	due date extensions, submit the changed date to the NRC in the annual Commitment Change
		described in Attachment 6.	Summary Report." Additionally, LS-AA-110, Attachment 2, states "If the original commitment
			has yet to be implemented, the licensee can proceed with the change. The NRC should be
•	,		notified of the change as soon as practicable after the change is approved by licensee
			management but before any committed completion date. This should be done within 30 days
			provided the committed date is not sooner." However, the due date for this item has been
			extended several times without notification to the NRC or submitting a supplemental response
			letter.

Table 3 – Audited Reported Changes

	Table 3 – Audited Reported Changes							
Regulatory Commitment Change Number	Original Date & Document	Change Date	Regulatory Commitment Summary	Change Status	Auditor's Assessment of Commitment Change (adequate, inadequate)			
04-001	SVP-00-077 (04/20/00)	05/26/04	Commitment established per reporting requirements 10 CFR 71.95(c): Standardized radioactive material shipping procedure requires an independent review of a cask Certificated of Compliance to ensure compliance with document requirements.	Original commitment completed 08/07/00 with the addition to procedure RP-AA-602.	Adequate: Reviewed commitment change package documentation. The revised procedure included the changed commitment but was not marked appropriately as described in LS-AA-110. Change 04-001 did not delete the commitment. Instead it revised the commitment and would be tracked appropriately in the CTD. However, there was not an associated CTD entry for this item.			
05-001	RS-03-001 (01/03/03)	02/14/05	License Renewal Commitment: Water chemistry program has to meet EPRI TR-1008192 (2004) requirements for monitoring and control of condensate and reactor feedwater control.	Completed with the addition of this to procedure CY-AB-120-110, Revision 7, "Condensate and Feedwater Chemistry."	Adequate: Reviewed Commitment change package and verified procedure change dated 05/21/04. Again, there was not an associated CTD entry for this item and LS-AA-110, Attachment 1, Parts 3 and 4 were not completed.			
05-004	ComEd letter (01/26/90)	10/24/05	Region III inspection request for environmental qualification of butyl rubber cables: (1) Visual inspections of cable be performed when there is evidence of cable degradation due to decreasing insulation resistance (IR). (2) Exelon intends to change the surveillance frequency for cable that have had no change in IR between previous surveillance inspections to 1.5-2.0 times the previous duration, not to exceed 3 refueling cycles. (3) Exelon may change the selection of specific butyl rubber insulated cables in the sample population monitored in the EQ program based upon information gathered from on-line measurement of cable tray temperatures, self-heating and radiation levels.	Commitment change completed on 01/13/07 by closing to AT441896-02 and 441896-03.	Adequate: Reviewed commitment change package, verified procedure QCEMS 0250-17, Rev. 23 change. However, at this time the EQ-04Q binder has not been updated to incorporate the commitment change. Also, there was not an associated CTD entry for this item. Additionally, this change involved 3 separate commitment changes while only 1 commitment change form submitted.			

Table 3 – Audited Reported Changes (continued)

Regulatory Commitment Change Number	Original Date & Document	Change Date	Regulatory Commitment Summary	Change Status	Auditor's Assessment of Commitment Change (adequate, inadequate)
05-005	ComEd letter (06/03/75)	11/09/05	Design criteria for the reactor building ambient temperature in the vicinity of the reactor building overhead crane is maintained above 70 degrees F.	Commitment change to above 50 degrees F incorporated into QCGM 0303-01, Rev. 5.	Adequate: Reviewed procedure however, it was noted that the revised commitment was not incorporated into the commitment section of the procedure. This change was to change the temperature not to delete the commitment. Again, there was not an associated CTD entry for this item and LS-AA-110, Attachment 1, Part 3 and 4 were not completed.
06-01	LER 254-98-018 (07/27/98)	02/24/06	LER 01-98-018: Scram discharge instrument volume (SDIV) would be examined to determine effects of hydrolasing on the instruments. System Engineering would evaluate results to determine if additional corrective action and reoccurrence controls are required for SDIV or other systems.	Commitment was deleted. System engineering performed evaluation and determined that no further action was necessary. This completed the regulatory commitment.	staff, as appropriate. Adequate: Commitment change package completed as required by LS-AA-110. Again, there was not an associated CTD entry for this item and LS-AA-110. Attachment 1, Part 3 and 4 were not completed.
06-02	NRC letter (10/11/89)	03/29/06	Safety Evaluation: The maintenance and surveillance valve performance on Limitorque actuators every other refueling outage or approximately every three years to ensure consistency, quality, and quantity of grease.	Frequency changed to once per 10 years.	Adequate: Reviewed commitment change package and EC 648988, Rev. 1. Again, there was not an associated CTD entry for this item and LS-AA-110, Attachment 1, Part 3 and 4 were not completed.

Table 4 – Audited Non-Reported Changes

			Table 4 - Addited Notified	ortou oriangeo	
Regulatory	Original Date	Change	Regulatory Commitment Summary	Change Status	Auditor's Assessment of Commitment
Commitment	& Document	Date			Change (adequate, inadequate)
Change :: ::					
Number					
05-02	LER 1-98-024	8/29/05	QCAP 2200-03, Attachment A	Deleted due to enhanced work	Adequate: This is not a regulatory
	(11/18/98)		revised 01-08-1999 to facilitate the	process with similar form	commitment per LS-AA-110. Verified
			SRO review of work additions	WC-AA-101-1002, Attachment 9.	original commitment to restore
			including LCO entries require Work		compliance was completed with the
			Week Manager to review work		revision to QCAP 2200-03, Attachment A
			additions with the package in hand.		(01/08/1999) and compared to form
					WC-AA-101-1002, Rev. 5, Attachment 9.
					However, there was not a CTD entry
					associated with this change.
05-003	LER 2-96-002	11/23/05	QCOS 2300-6 revised 12/13/1996 to	Deleted because the commitment	Adequate: This is not a regulatory
	(03/20/96)		include vent verification.	was not necessary to minimize	commitment per LS-AA-110. Verified
		,		recurrence of the adverse	original commitment documentation
				condition.	dated 12/13/1996 and reviewed
				·	commitment change package and revised
					QCOS 2300-6, Rev. 30. However, there
			·		was not a CTD entry associated with this
					change.