July 29, 2008

Mr. Thomas D. Walt, Vice President
H. B. Robinson Steam Electric Plant,
Unit No. 2
Carolina Power & Light Company
3581 West Entrance Road
Hartsville, South Carolina 29550-0790

SUBJECT: H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 — AUDIT OF THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. MD8760)

Dear Mr. Walt:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments, and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the programs are consistent with the industry guidance in NEI 99-04, and to ensure that the regulatory commitments are being effectively implemented.

An audit of the H.B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP), commitment management program was performed at the plant site in Hartsville, South Carolina, between June 11, 2008, and June 12, 2008. The NRC staff concludes, based on the audit, that HBRSEP (1) has implemented NRC commitments on a timely basis, and (2) has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report. Please contact me at (301) 415-3178 if you have questions.

Sincerely,

/RA/

Marlayna Vaaler, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-261

Enclosure: Audit Report

cc w/enclosure: See next page

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments, and encouraged licensees to use the NEI guidance, or similar administrative controls, to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the programs are consistent with the industry guidance in NEI 99-04, and to ensure that the regulatory commitments are being effectively implemented.

NEI 99-04 defines a "regulatory commitment" as 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. NRR guidelines direct 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, relief requests, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the H.B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP), commitment management program was performed at the plant site in Hartsville, South Carolina, between June 11, 2008, and June 12, 2008. As this was the first audit recorded, the audit reviewed commitments made since 2000. The audit consisted 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.

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 commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Commitments made in Licensee Event Reports or in response to Notices of Violation may be included in the sample, but the review will be limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched the Agencywide Documents Access and Management System for the licensee's submittals during in the last several years and selected a representative sample for verification. The selection of the sample list covered a variety of systems, disciplines and licensing actions important to the NRC staff's decision-making process. This list also included commitment changes.

The licensee was asked to provide a list of regulatory commitments related to licensing actions from its commitment management system. The NRC staff again ensured that the selected sample 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, engineering changes, or other plant documents). The Audit Summary table lists the commitments selected for this audit.

The audit excluded the following types of commitments that are internal to licensee processes:

(1) Commitments made on the licensee's own initiative among internal organizational components.

(2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond 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.

(3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications (TSs), and Updated Final Safety Analysis Reports (UFSARs). Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The NRC staff reviewed documentation generated by the licensee related to the sample items listed in the attached table that are categorized as commitments in response to different categories of documents, in order to assess the implementation of the regulatory commitment, including the completion status. For the sample of commitments selected for the audit, the NRC staff found that the licensee had adequately captured all of the regulatory commitments in their PassPort© system, which is a data management and tracking tool. The review of the sample commitments in the PassPort© database reflected their status consistent with the commitment program. The attached Audit Summary table provides details of the audit and its results.

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

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in NEI 99-04, which the NRC has found to be an acceptable guide for licensees to follow for managing and changing commitments. The process used at HBRSEP is contained in REG-NGGC-0110, "Regulatory Commitments."

The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. The audit also verified that HBRSEP's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee staff personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

REG-NGGC-0110 includes the following statements, which provide guidance to the licensee that is consistent with the intent of NEI 99-04, and ensure that HBRSEP is appropriately implementing regulatory commitments, as well as tracking changes to the commitments:

> In the case where a third party (e.g., NEI, an owners group, or another organization) has been authorized to make Regulatory Commitments on behalf of the Licensee, the affected Licensee shall ensure that statements represented as Regulatory Commitments are appropriately documented and are subsequently managed in accordance with REG-NGGC-0110.
>
> Docketed correspondence containing action items shall also contain an explicit statement concerning the existence of any Regulatory Commitment.
>
> Once made, Regulatory Commitments shall be considered non-discretionary and shall be changed only as described in REG-NGGC-0110.
>
> Each Regulatory Commitment shall be captured in a PassPort© Action Request (AR).

Appropriate actions to implement Regulatory Commitments shall be captured in a PassPort© Action Tracking Assignment.

Once accepted, any action inherent to the successful implementation of a Regulatory Commitment shall be considered non-discretionary and shall only be changed as described in REG-NGGC-0110.

The Responsible Licensing Supervisor, or designee, shall ensure the accuracy of any implicit or explicit re-statement of a Regulatory Commitment in docketed correspondence received from the NRC to ensure that written or oral communication has not been misconstrued.

Except for “discretionary enforcement” situations, advise the NRC that an oral statement to take a certain action represents an intent to make a Regulatory Commitment but does not constitute a Regulatory Commitment until submitted by the Licensee in writing on the docket.

An Assignment associated with a Regulatory Commitment must include appropriate reference to implementing documentation to provide traceability for the Regulatory Commitment.

The Responsible Licensing Supervisor, or designee, shall consider the need to incorporate the Regulatory Commitment into an NRC mandated licensing basis document such as the UFSAR, Quality Assurance Program, Emergency Plan, Security Plan, Fire Protection Program, etc.

If it becomes apparent that an Assignment cannot be implemented as described by the due date, the responsible individual/group shall promptly contact the Responsible Licensing Supervisor, or designee, with a proposed revision.

If a Regulatory Commitment is not implemented as described by the due date or if non-compliance with Regulatory Commitment occurs, the Responsible Licensing Supervisor, or designee, shall initiate a Nuclear Condition Report, and, if necessary, notify the NRC.

When notified of the need to change a Regulatory Commitment, the Responsible Licensing Supervisor, or designee, shall ensure an Assignment is initiated to the individual/group that includes a Regulatory Commitment Change Evaluation,

The Responsible Licensing Supervisor, or designee, shall review the Regulatory Commitment Change Evaluation, including any necessary supporting documents, and verify the actions that need to be taken based on the results.

As appropriate, the Responsible Licensing Supervisor, or designee, shall record the basis for authorizing or not authorizing the change, as well as submit docketed correspondence and capture the revised Regulatory Commitment.

The Responsible Licensing Supervisor, or designee, may also authorize revision of the scope or committed date for a Regulatory Commitment based on related correspondence submitted to the NRC.

It may be appropriate to track the reporting of the Regulatory Commitment change(s) consistent with the frequency of the next UFSAR update or biennially.

The Responsible Licensing Supervisor, or designee, shall ensure that any revised Regulatory Commitment, that satisfies the criteria for reportability to the NRC in the Regulatory Commitment Change Evaluation, is included on a summary report of Regulatory Commitment changes which is submitted on a frequency consistent with 10 CFR 50.71(e) UFSAR updates or biennially.

When making changes to procedures or other documents used to implement a Regulatory Commitment, the responsible organization ensures that the changes do not invalidate compliance with the applicable Regulatory Commitment.

When canceling procedures or other documents used to implement a Regulatory Commitment, the responsible organization ensures that the Regulatory Commitment is still being met and is properly referenced in another appropriate document to ensure continued implementation of the Regulatory Commitment.

If the Regulatory Commitment is no longer needed and a change is warranted, the responsible organization may request a change per the guidance in REG-NGGC-0110

In addition, the NRC staff reviewed documentation from the licensee related to the sample items listed in the attached table that involved changes to commitments. The NRC staff found that the licensee properly addressed each regulatory commitment change selected for this audit and has implemented an effective program to manage commitment changes.

The NRC staff found that REG-NGGC-0110 adequately conforms to the guidance and intent of NEI 99-04 for commitment tracking, the commitment change process, traceability of commitments, and reporting requirements. Discussions with HBRSEP staff confirmed that REG-NGGC-0110 is being implemented in its entirely at the plant, which further supports the NRC staff's conclusion that regulatory commitments are being handled in accordance with the guidance contained in NEI 99-04.

3.0 CONCLUSION

The NRC staff concludes, based on the above audit, that HBRSEP (1) has implemented NRC commitments on a timely basis, and (2) has implemented an effective program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Curt Castell	Supervisor - Licensing and Regulatory Programs
Ray Crandall	Licensing Engineer

Principal Contributor: Marlayna Vaaler

Attachment: Summary of Audit Results

AUDIT OF CAROLINA POWER AND LIGHT COMPANY

MANAGEMENT OF REGULATORY COMMITMENTS

AT H.B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PERFORMED JUNE 11 AND 12, 2008

LIST OF COMMITMENTS INCLUDED IN THE AUDIT

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
1	Regulatory Correspondence on the PAM Instrumentation Report	00031856	RNP-RA/ 01-0094	8/1/2001 7/12/2001	Plant procedures will be revised by August 1, 2001, to require inspection of insulation on, and immediately below, the pressurizer head to ensure that no gaps, tears, or other visible signs of degradation exist	PLP-006 Revision 51 was made via DCF 2001P0859 to incorporate the inspection requirement; the requirement was added to both the general closeout and prior to heatup closeout checklists
2	Regulatory Correspondence on the PAM Instrumentation Report	00031856	RNP-RA/ 01-0094	8/01/2001 7/23/2001	A routine maintenance activity will be added to perform thermography to the extent practical of the pressurizer at an appropriate temperature during outages to inspect insulation performance	PMR 2001-078 was processed and PMID-RQ 26976-01 created to perform thermography of the pressurizer insulation during refueling outages, in Mode 4, prior to increasing power
3	License Amendment for the Alternate Source Term	00060673	RNP-RA/ 02-0067	1/31/2003 1/29/2003	Perform a leak rate test on the Unit 2 control room	Testing for the Unit 2 control room was performed the week of January 20, 2003; special procedure SP-1506 was used to establish the system line up and provide guidance in performing the vendor (NCS/LAT) procedures

Attachment

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
4	License Amendment for the Alternate Source Term	00060673	RNP-RA/ 02-0067	3/7/2003 3/3/2003	Revise analyses as necessary to incorporate the new control room inleakage rate	A reanalysis of the AST events to support the control room air inleakage testing results was determined not necessary as testing of the air inleakage resulted in measured values that were lower than those values used in the original AST events analysis; therefore the original AST events analysis remained bounding
5	License Amendment for the Alternate Source Term	00060673	RNP-RA/ 02-0067	2/28/2003 2/24/2003	Prepare a licensing submittal to provide the test results and update the affected analysis, if necessary	A submittal to the NRC providing the preliminary inleakage test results was prepared and reviewed in advance of the final test results being submitted by the vendor
6	License Amendment for the Alternate Source Term	00060673	RNP-RA/ 02-0067	3/7/2003 3/4/2003	If control room leakage test shows the current licensing basis is not met, develop a comprehensive corrective action plan to restore compliance with the GDC-19 dose acceptance criteria	The draft final report from the test vendor for the control room inleakage testing indicated that the plant was not operating in its CLB for the 60 min to 30 day portion of the accident; AR 86280 was initiated and an OD entered; the OD was addressed and then exited by operations once evaluated
7	License Amendment for the Alternate Source Term	00060673	RNP-RA/ 02-0067	4/22/2003 4/21/2003	Submit inleakage test results to the NRC	Letter RNP-RA/03-0013 was submitted to the NRC on 4/10/2003 providing the control room tracer gas inleakage test results
8	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 11/6/2002	Revise maintenance and calibration procedures to incorporate Caldon maintenance and calibration requirements prior to declaring the LEFM system operable and raising power above the current licensed power level	All maintenance and calibration procedures identified in the affected document list for EC 47152, EC 47162, and EC 47163 were revised to support the power uprate and the LEFM system

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
9	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/29/2002 12/2/2002	Incorporate operability requirements for the LEFM into the Technical Requirements Manual	LEFM operability requirements were established in TRM Section 3.25, issued in TRM Revision 15, on November 14, 2002
10	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 11/1/2002	For those feedwater heater components that were evaluated to exceed HEI guidelines, but that have not been recently measured and inspected, measurement and inspection of these feedwater heater components will be performed prior to operating at the uprated power condition	The drain inlet to the 1A and 1B feedwater heaters enters the shell beyond the tube bundle so that there is no effect on the tubes regardless of the condition of any impingement plates; in reviewing the drawings for the 2A and 2B heaters, it was determined that there are no drain inlet impingement plates installed; the impingement plates in the 3A and 3B feedwater heaters were inspected during a refueling outage and there was no significant wear on the drain inlet piping and nozzle
11	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 10/28/2002	Replace the shell-side feedwater heater relief valves with relief valves that meet HEI guidelines prior to operating at the uprated power condition	The secondary side plant project team reported that all shell-side feedwater relief valves were replaced with valves of adequate capacity to meet the HEI guides
12	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 11/6/2002	Revise normal and abnormal operating procedures, emergency operating procedures, and off-normal procedures prior to use at the uprated power conditions	All procedures for normal, off normal, and emergency operating identified by the EC 47152, EC 47162, and EC 47163 affected documents lists were revised
13	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 11/6/2002	Revise operating procedures to indicate that temporary operation above the licensed power level shall be limited to 0.3 percent of rated thermal power, consistent with the reduced power measurement uncertainty, prior to operation at uprated power levels	OP-105, OST-010, and the ERFIS alarm setpoints were revised to support administrative controls that ensure plant operation less than 0.3 percent rated thermal power

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
14	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	10/11/2002 10/8/2002	Provide simulator training on power uprate related changes to the plant that affect operator performance prior to operating at uprated power levels	Operator training was conducted in both the classroom and simulator starting September 30 and finishing October 8, 2002, as part of LOCT Cycle 02-05. This included all licensed operators and non-licensed shift technical advisors; this training included procedure changes impacted by the power uprate, AST project, and plant modifications; it also included TS, AST, and TRM changes in support of the power uprate; simulator training included similar aspects
15	License Amendment for Power Uprate	00061023	RNP-RA/ 02-0066	11/6/2002 11/4/2002	Complete hardware and software changes, including changes involving plant process computer inputs, which affect operator performance prior to operation at the uprated power level	Hardware and software changes were implemented using the following ECs: EC 47163, EC 47152, EC 47139, EC 47162, EC 47804, and EC 48706
16	Licensee Event Report 2003-02	00100967	RNP-RA/ 03-0098	9/30/2003 9/29/2003	A temporary modification will be implemented, which will restore the design basis requirement that the switch failure will not prevent the safety function	EC-TCHG 54382 was implemented on 9/23/2003; this temporary modification restored the design basis for V12-10, 11, 12, and 13 in that a switch failure will not prevent the valves from performing their safety function
17	Licensee Event Report 2003-02	00100967	RNP-RA/ 03-0098	10/25/2003 10/6/2003	Replace the control switch for the vacuum relief valves (V12-12 and V12-13) and evaluate the removed switch for any signs of degradation	The control switch for vacuum relief valves V12-12-34 and 14 was removed on 9/24/2003 and sent to the EE Center for evaluation

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
18	Licensee Event Report 2003-02	00100967	RNP-RA/ 03-0098	10/25/2003 9/24/2003	Review the safety related component control wiring diagrams to verify that redundant components are designed with individual control switches in each circuit, and that failure of individual component control switches alone will not cause a failure to fulfill a safety function	Completed under AR 95470 AI 15, which involved an evaluation by the Progress Energy EE Center
19	Licensee Event Report 2003-02	00100967	RNP-RA/ 03-0098	10/25/2003 10/24/2003	Verify operability of the isolation function when a source is applied to radiation monitors R-11 and R-12 by confirming functional testing or establishing procedural guidance	OST-924-3 to address the functional check was approved on 10/23/2003
20	Licensee Event Report 2003-02	00100967	RNP-RA/ 03-0098	5/27/2004 5/24/2004	A permanent modification of the containment vacuum and pressure relief control circuits will be installed to restore the design such that the control switch is wired in series with the Train “A” and Train ”B” containment isolation relay contacts	EC 54398, Control Wiring Change for Containment Pressure Relief Valves V12-10/11 and V12-12/12, was completed on 5/20/2004 and turned over to operations; this engineering change permanently restores the design basis
21	Regulatory Correspondence on the RFO-22 ISI Report	00135877	RNP-RA/ 04-0110	12/1/2014 3/7/2007	Evaluate or examine the CV liner in the area immediately above Panel 228-ZZZb at the Fuel Transfer Canal	These examinations of the CV liner were completed by the committed date
22	Regulatory Correspondence on the RFO-22 ISI Report	00135877	RNP-RA/ 04-0110	10/31/2010 3/7/2007	Evaluate or examine the CV liner in the area immediately above Panel 228-C1 at the Regenerative Heat Exchanger Wall	These examinations of the CV liner were completed by the committed date
23	Licensee Event Report 2006-01	00217202	RNP-RA/ 06-0120	4/30/2007 4/27/2007	Replace the turbine EHC card during the 2007 refueling outage	The EHC system up/down counter card was replaced with a new style card (1B51049-101) under WO 990014

No.	Category	Action Request No.	Letter No.	Due Date & Completion Date	Commitment	Completion Method
24	Licensee Event Report 2007-01	00239362	RNP-RA/ 07-0067	9/14/2007 9/8/2007	Revise Construction Department Procedures CON-TRMC-00540 and CON-TRMC-00504 to include tightness check of crimped connections including a pull test	The transmission documents CON-TRMC-00540 and CON-TRMC-00504 were revised
25	Licensee Event Report 2007-01	00239362	RNP-RA/ 07-0067	11/2/2008 4/25/2008	Replace the B MDAFW pump control switch during RFO-25	WO 1106292 has been created to replace the B MDAFW pump control switch