



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 1, 2009

Vice President, Operations  
Entergy Nuclear Operations, Inc.  
James A. FitzPatrick Nuclear Power Plant  
P.O. Box 110  
Lycoming, NY 13093

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT - AUDIT OF ENTERGY'S  
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. ME1717)

Dear Sir or Madam:

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's 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

The NRC's staff performed an audit of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) commitment management program at JAFNPP, which is located near Oswego, New York, on August 17 through August 20, 2009, and reviewed commitments made by JAFNPP in the past 3 years since the previous audit on May 31 and June 1, 2006. The NRC staff concludes, based on the audit, that (1) JAFNPP has implemented NRC commitments for JAFNPP on a timely basis; and (2) JAFNPP has implemented an effective program for managing NRC commitment changes at JAFNPP. Details of the audit are set forth in the enclosed audit report.

V. P. Operations

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If you have questions, please contact me at (301)-415-3308.

Sincerely,

A handwritten signature in black ink, appearing to read "B.K. Vaidya". The signature is written in a cursive style with some underlining.

Bhalchandra K. Vaidya, Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure:  
Audit Report

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

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's 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and that 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, 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 NRC staff performed an audit of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) commitment management program at JAFNPP, which is located near Oswego, New York, on August 17 through August 20, 2009, and reviewed commitments made by Entergy Nuclear Operations, Inc. (Entergy or the licensee) in the past 3 years since the previous audit on May 31 and June 1, 2006. Entergy is the licensee for JAFNPP. The Entergy commitment management system is described in the Entergy corporate procedure EN-LI-110, "Commitment Management Program," Rev. 1, dated December 27, 2007. EN-LI-110 is based on and implements the recommendations of NEI 99-04, "Guidelines for Managing NRC Commitment Changes," Rev. 0.

Enclosure

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 in accordance with the NRC guidance and approved plant procedures. 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

Before the audit, the NRC staff searched Agencywide Documents Access and Management System (ADAMS) for a sampling of the licensee's licensing actions dated within the past 3 years, since the previous audit on May 31 and June 1, 2006, and selected a representative sample for verification. Table 1 lists the licensee's commitments which were audited.

The list of the selected regulatory commitments for JAFNPP was provided to the site licensing group with a request to provide plant documentation used to track each individual commitment. Also, the site personnel were requested to provide status and a copy of the revised documents (plant procedures, Updated Final Safety Analysis Report (UFSAR), Technical Specifications (TSs), etc.) for verification, if the required actions had already been completed. The regulatory commitments were reviewed against the plant documents to verify if the commitment had been implemented satisfactorily in accordance with the approved plant procedures.

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.

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, TSs, and 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 the commitments listed in Table 1 to ensure that the selected commitments are included in the plant database used to track the commitments and evaluate the status of completion of each commitment. The NRC staff found that the licensee's commitment tracking program had captured the regulatory commitments that were identified by the NRC staff before the audit.

The NRC staff also reviewed plant procedures and other design bases documents that had been revised as a result of commitments made by the licensee to NRC. These procedures and documents are identified in the right-hand column of Table 1. The NRC staff review indicated that:

1. All the regulatory commitments selected for the audit were being tracked.
2. Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.

Table 1 (Item Nos. 1 through 10 and 14 through 22), summarizes what the NRC staff observed as the current status of licensee commitments reviewed during the audit.

### 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 JAFNPP is contained in the Entergy corporate procedure, EN-LI-110, "Commitment Management Program," Rev. 1 dated December 27, 2007. 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 verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee 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.

The NRC staff reviewed the licensee's procedure EN-LI-110, "Commitment Management Program," Revision 1, against NEI 99-04 guidelines. In particular, in regards to managing a change or deviation from a previously completed commitment, Section 1.0 specifically states that the procedure is based on and implements the recommendations of NEI 99-04. Section 5.5 of EN-LI-110 defines the process for making changes to a commitment. In general, EN-LI-110 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 NRC staff reviewed the reported revisions to the docketed commitments as permitted per NEI-99-04, from the licensee to the NRC during 2005, 2006, 2007, and 2008. These were included in the Entergy letter JAFP-07-0065 dated May 15, 2007, and JAFP-09-0060, dated

May 11, 2009. The NRC staff has no comments on these revisions, but may inspect them in more detail at a later time.

### 2.2.1 Audit Results

As set forth in Section 2.1.2 above, the NRC staff found that the licensee had properly addressed all the regulatory commitments selected for this audit. As a result of the review of the licensee's information, as well as information from other sources, the NRC staff found the licensee's reported status of the audited commitments to be acceptable. Thus, the NRC staff finds that the procedure used by the licensee to manage commitments is appropriate and effective.

However, the NRC staff noted that the computer software systems used by the licensee to enter and track the regulatory commitments, called "ACT/LRS" systems, are very complicated, the development of the user's manual/instructions for the LRS system is not complete, and the process used by the licensee to manage commitments could be more effective and user-friendly. Therefore, the NRC staff would like to make the following recommendations for improvements:

1. For the commitments requiring "Continuous Compliance" for periodic implementations such as training, in-coming testing, etc., the licensee keeps the commitment "Open" until the end of the license period (2034). However, there is no history of implementations in the commitment Tracking System (LRS), unless one searches other documents such as Training Records, Test Records, etc. The NRC staff recommends that in such cases, either a) the LRS should reflect the implementation history, or b) "close" the current commitment and "open" a new commitment for next implementation.
2. The NRC staff noted that in some cases (Items 15 and 16), while entering the commitments in the System, the commitments, as made were combined. This made it difficult to track the commitments. The NRC staff recommends that in such cases, the notes should be added in the system to explain the manner in which the combination and/or alterations were done.
3. In some cases (Item 3), the commitment should have been closed and the "incoming testing" tracked by some other documentation/process.
4. The licensee also indicated that it does not enter the commitments until the licensee's request is proved by the NRC staff, such as issuance of an amendment, approval of the relief request, or exemptions, etc. If the request is withdrawn by the licensee or not approved by the NRC, the commitments made remain "Publicly Available" in the NRC's ADAMS. This would make the licensee vulnerable to the questions from the interveners. The NRC staff recommends that the licensee enter all the commitments in the systems as when they are made via submissions to the NRC and close them either because they have been implemented or have been withdrawn or the licensing request was not approved by the NRC.

The above recommendations by the NRC staff have been discussed with the licensee during the audit.

Table 1 (Item Nos. 11 through 13), summarizes what the NRC staff observed as the current status of licensee commitments reviewed during the audit.

### 3.0 CONCLUSION

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

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

E. Dorman

Attachment: Table 1, Audit Summary - Audited Written Commitments and Related Information (June 2006 through August 2009)

Principal Contributors: B. Vaidya  
J. Kim

Date: September 1, 2009

TABLE 1

AUDIT SUMMARY

AUDITED: WRITTEN COMMITMENTS AND RELATED INFORMATION

(June 2006 THROUGH August 2009)

CA = Corrective Action, LO = Learning Organization, LAR = Licensing Action Request,  
LRS = Licensing Research System (Current System), ACT = (Old System), LO-LAR = System used during Transition

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
1	A-18334	Continuing Compliance	JAFP-07-0004, 01/11/2007, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	MD0613-MD4533 / B.5.b  Revise the Severe Accident Management Guide (SAMG) like procedure for Damage to Large Areas of the Plant to include the viable strategies as considerations for resolving equipment problems. ( Technical Support Guidelines (TSG)-10 and TSG-12)	06/30/2007	Open
2	A-18339	Continuing Compliance	JAFP-07-0004, 01/11/2007, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	MD0613-MD4533 / B.5.b  Provide training on B.5.b Phase 2 and 3 strategies and enhancements to appropriate personnel.	12/31/2007	Open Commitment Record does not show history of implementation.

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
3	LO-LAR-2009-00046 CA-00003 CA-00019	One-Time Action	JAFP-08-0086, 06/27/2008, Response to RAI Re: Amendment Request to revise TSs Regarding Diesel Fuel Oil, Lube Oil, and Starting Air Consistent with TSTF-501 and Diesel Fuel Oil Testing Program Consistent with TSTF-374	MD7927/ Amendment Obtain test equipment and develop a test procedure for water and sediment testing in accordance with ASTM-D1796 or ASTM-D2709	60 days after receipt of approved amendment	Open  Commitment was implemented by making the test equipment available and developing the test procedure.  This should have been closed and the actual testing should be tracked by other process.
4	LO-WT-HQN-2008-00153 CA-00009  LO-LAR-2009-00057 CA-00002	One-Time Action	JAFP-08-0092, 09/12/2008, Extension Request for Response to GL 2008-01	MD7828 / GL 2008-01  JAF will submit a 9-month response to GL 2008-01, including a description of the results of the systems evaluated prior to the R18 refueling outage, a description of the corrective actions required based upon the preliminary plant review of ABS Consulting analysis, a statement regarding which corrective actions have been completed, a schedule for completing any remaining corrective actions and the basis for the schedule.	10/11/2008	Closed (JAFP-08-0107)

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
5	LO-LAR-2009-00057 CA-00001	One-Time Action	JAFP-08-0092, 09/12/2008, Extension Request for Response to GL 2008-01	MD7828 / GL 2008-01  JAF will submit a supplemental response to GL 2008-01, including a description of the results of the systems evaluated, a description of the corrective actions required, a statement regarding which corrective actions have been completed, a schedule for completing the remaining corrective actions, the basis for the schedule and the means by which any long term actions determined necessary will be tracked for implementation.	03/31/2009	Closed  (JAFP-09-0037)
6	LO-LAR-2008-00244 CA-00002	One-Time Action	JAFP-08-0099, 09/26/2008, James A. FitzPatrick Request for Relief (RR-7) - Proposed Alternative to ASME Code Requirements for Weld Overlay Repairs	MD9780 / Relief Request RR-7  A discussion of any repairs to the weld overlay material and/or base metal and the reason for the repairs.	14 days after completing the final ultrasonic examinations of the completed weld overlays	Closed  (JAFP-09-0109)
7	LO-LAR-2008-00244 CA-00002	One-Time Action	JAFP-08-0102, 10/01/2008, Request for Relief (RR-7 Revision 1) - Proposed Alternative to ASME Code Requirements for Weld Overlay Repairs	MD9780 / Relief Request RR-7 /  Disposition of indications using the standards of ASME Section XI, Subsection IWB-3514-2 and/or IWB-3514-3 criteria and, if possible, the type and nature of the indications	14 days after completing the final ultrasonic examinations of the completed weld overlays.	Closed  (JAFP-09-0109)
8	LO-LAR-2008-00020 CA-00011	One-Time Action	JAFP-08-0107, 10/14/2008, Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	MD7828 / GL 2008-01  Revise the UFSAR to add a statement that the subject systems are kept sufficiently filled with water to ensure that system remains operable and performs properly.	04/29/2009	Closed

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
9	LO-LAR-2008-00020 CA-00015	One-Time Action	JAFP-08-0107, 10/14/2008, Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	MD7828 / GL 2008-01  Revise system operating procedures to ensure each section of piping is filled and vented.	04/29/2009	Closed
10	LO-LAR-2008-00020 CA-00019	One-Time Action	JAFP-08-0107, 10/14/2008, Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	MD7828 / GL 2008-01  Develop a program to monitor and trend gas accumulation in ECCS systems within the scope of this report. The program intent would be to conduct monitoring and could be suspended if trending indicates no issues have developed in the specific systems.	04/30/2009	Open Program development completed via "Program Notebook." Left open due to the aspect of "Monitoring."
11	CCR-09-001 LO-LAR-2008-00020 CA-00012 CA-00015	Commitment Change	JAFP-08-0107, 10/14/2008, Nine-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"	MD7828 / GL 2008-01  Revise Licensing Commitment A-5408 to reflect the use of manual vent valves in conjunction with the motor operated valves on the RHR HX and inlet header configuration.	A-5408 was implemented.	Closed.

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
12	CCR-08-001 A-18330	Commitment Change	JAFP-07-0004, 01/11/2007, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	<p>MD0613-MD4533 / B.5.b</p> <p><u>FROM:</u> Develop and proceduralize a strategy to provide makeup water to the Hotwell via the waterbox access doors using firewater supplied from either an internal fire header standpipe or using the portable pump.</p> <p><u>TO:</u> Develop and proceduralize a strategy to provide makeup water to the Hotwell via the 18 inch manway using firewater supplied from either an internal fire header standpipe or using the portable pump.</p>	Not Applicable  Need for Revision determined during implementation. Revised commitment was implemented	Closed
13	CCR-08-002 A-18329	Commitment Change	JAFP-07-0004, 01/11/2007, Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	<p>MD0613-MD4533 / B.5.b</p> <p><u>FROM:</u> Develop and proceduralize a strategy for supplying power to energize the Safety Relief valves from the outside containment junction box to depressurize the RPV. (As described in the strategy the intent was to modify 25-ASP and initiate the strategy from the ASP.)</p> <p><u>TO:</u> Develop and proceduralize a strategy for supplying power to energize the Safety Relief valves from the outside containment junction box to depressurize the RPV. (As developed and implemented through TSG-12 the strategy is implemented from a junction box located near the containment wall.</p>	Not Applicable  Need for Revision determined during implementation. Revised commitment was implemented	Closed

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
14A	A-14539 (ACT-06-68016)	Continuing Compliance	CNRO-2006-00030, 05/16/2006	MD1738 / Request for Use of Weighting Factors for External Exposure  1) Entergy will monitor the part of the whole body within each compartment (and/or composite compartment) that receives the highest dose. Entergy is developing a fleet wide Nuclear Management Manual procedure EN-RP-204, "Special Monitoring Requirements," for determining dosimeter selection and placement. This procedure guidance will be consistent with that found in NRC Inspection Procedure 71121.01, Issue date 03/06/02.	During monitoring	Open  Procedures completed but kept open because of the monitoring aspect of the commitments

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
14B	A-14540 (ACT-06-68017)	Continuing Compliance	CNRO-2006-00030, 05/16/2006	<p>MD1738 / Request for Use of Weighting Factors for External Exposure</p> <p>2) Based on the NRC's approval of this request, Entergy will account for dose consistent with the guidance of the standard as follows:</p> <p>The DDE for each compartment will be determined from dosimeters worn at that location. When no dosimeter is worn at a particular compartment, the DDE will be determined from the dosimeter positioned where the exposure is judged to be similar. The assigned EDE will be the sum of each DDE measurement multiplied by its appropriate compartment factor.</p> <p>The assigned lens dose equivalent (LDE) will be the higher of the head or chest dosimeters. The assigned shallow dose equivalent (SDE) will be the highest of any whole body dosimeter.</p>	During monitoring	Open Procedures completed but kept open because of the monitoring aspect of the commitments
15	A-14546 through A-14551 (ACT-06-68024 through 68029)	Continuing Compliance	CNRO-2006-00021, 05/16/2006	<p>MD1748 / Request for Use of Delta Protection's Mururoa V4F1 R" Suits</p> <p>ALL 7 COMMITMENTS</p>	prior to the use of the Suit	Open procedures developed but commitment kept open

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
16	A-14546 through A-14551  (ACT-06-68024 through 68029)	Continuing Compliance	CNRO-2006-00034, 07/13/2006	MD1748 / Request for Use of Delta Protection's Mururoa V4F1 R" Suits  ALL 6 COMMITMENTS	prior to the use of the Suit	Open procedures developed but commitment kept open
17	A-18388 through A-18394  Entered in the system as a part of the implementation of CR— JAF-2009-02770	Not Applicable. Superseded by the commitments in item 18.	CNRO-2006-00020, 05/19/2006	MD1823 / Request for Use of Delta Protection's "Mururoa BLU" Suits  ALL COMMITMENTS	Not Applicable. Superseded by the commitments in item 18.	Closed
18	A-18395 through A-18402  Entered in the system as a part of the implementation of CR— JAF-2009-02770	Continuing Compliance	CNRO-2006-00035, 07/13/2006	MD1823 / Request for Use of Delta Protection's "Mururoa BLU" Suits  ALL 8 COMMITMENTS	prior to the use of the Suit	Closed

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
19	A-14535 (ACT-06-68012)	Continuing Compliance	ENOC-2006-00013, 04/26/2006	MD4533 / B.5.b  ONE COMMITMENT  Procedure changes for the industry proposed fuel dispersal strategy will be effective for use during the next refueling beginning after June 30, 2006.	Next Refueling Outage (RFO) after 06/30/2006, RFO-17	Closed
20	A-14397 (ACT-04-67792)	One-Time Action	JAFP-04-0159, 09/27/2004	MD6136 / GL 2003-01 Control Room Habitability  ONE COMMITMENT  ENO commits to creating a preventive maintenance surveillance procedure to annually inspect the Relay Room and components located inside the CRE to ensure CRE unfiltered inleakage vulnerability is maintained as leak tight as possible.	12/31/2004	Closed
21	A-18340	One-Time Action	ENOC-09-00009, 04/27/2009	ME1200 / Amendment to Adopt TSTF-511  ONE COMMITMENT  Removal of the plant-specific Technical Specification requirements will be performed concurrently with the implementation of the 10 CFR 26, Subpart I requirements. This commitment will be completed no later than October 1, 2009.	10/1/2009  Concurrent with implementation of Fatigue Rule	Open

Item No.	Licensee's Commitment Tracking No.	Commitment Type	Licensee's Submittal	NRC TAC No./ Subject / Summary of Commitment,	Scheduled Implementation Date (If Required)	Licensee Implementation Status
22	A-18403 through A-18416 Entered in the system during the audit.	One-Time Action	JAFP-09-0072, 06/06/2009	ME1404 / Emergency Amendment Re: Extension of AOT for EDG-C  ALL 14 COMMITMENTS	Prior to entering extended AOT and maintained for the duration of the AOT	Closed. Implemented via checklist.

V. P. Operations

- 2 -

If you have questions, please contact me at (301)-415-3308.

Sincerely,

**/RA/**

Bhalchandra K. Vaidya, Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure:  
Audit Report

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