



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

April 11, 2011

Mr. David A. Heacock  
President and Chief Nuclear Officer  
Dominion Nuclear  
Dominion Energy Kewaunee, Inc.  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: KEWAUNEE POWER STATION - AUDIT OF THE LICENSEE'S MANAGEMENT  
OF REGULATORY COMMITMENTS (TAC NO. ME3804)

Dear Mr. Heacock:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the 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. Licensees are encouraged to use NEI 99-04 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and regulatory commitments are being effectively implemented. Accordingly, an audit was performed on the Kewaunee Power Station site on December 6-9, 2010, approximately 3 years from the last audit. Based on the audit, the NRC staff concludes that (1) Dominion Energy Kewaunee, Inc. (the licensee) has implemented, or is tracking future implementation of, regulatory commitments made to the NRC; and (2) the licensee had implemented an effective program to manage regulatory commitment changes. Details of the audit are set forth in the enclosed audit report. This completes the NRC staff's efforts on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Karl Feintuch".

Karl Feintuch, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Audit Report

cc w/encl: Distribution via ListServ



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

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

REGULATORY COMMITMENTS MADE BY THE LICENSEE TO

THE NUCLEAR REGULATORY COMMISSION (NRC)

KEWAUNEE POWER STATION (KPS)

DOCKET NO. 50-305

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 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and 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

Since the last audit was completed 3 years ago (see audit report dated September 15, 2007, Agencywide Documents Access and Management System (ADAMS) Accession No. ML071860074), the NRC staff defined the period covered by this audit to be approximately the summer of 2007, to summer of 2010. The audit was performed onsite at KPS on December 6-9, 2010, using an audit sample derived from the period of interest. The audit sample consisted of 19 items. Each item was assigned the corresponding sample number as an identifier and to facilitate the collecting and collating audit results data.

The KPS system is capable of separating a single regulatory commitment into separately managed actions, each with their own path to completion and with their own change history. By this mechanism the audit sample was enlarged when samples Nos. 11, 16, 17, and 19 became 11a, b, c; 16a, b; 17a, b, c; and 19a, b; respectively. Audit sample 15 was deleted after consultation with the project manager who assembled the original sample when it was determined that it yielded no additional information not obtained from the other samples, and its contribution to the audit did not justify the special handling needed because of proprietary information. Consequently, the sample size increased by a net of 24.

The audit consisted of two major parts: (1) verification of the licensee's implementation of commitments made to NRC that have been completed; and (2) verification of the licensee's program for managing changes to commitments made to NRC.

The audit was conducted to exercise the full management system including information retrieval and interpretation by assigned personnel. The Dominion Energy Kewaunee, Inc. (DEK) person directly supporting this audit was MaryJo Haese, one of three persons of comparable knowledge who routinely support the management system. Ms. Haese demonstrated fluency in retrieval of information and interpretation of it. It was concluded that DEK had sufficient infrastructure to maintain regulatory commitment management system performance should attrition occur among cognizant personnel.

## 2.1 Verification of Licensee's Implementation of Commitments Made to the NRC

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 the bulk of commitments made by the licensee during the review period. The audit focused on regulatory commitment (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, reliefs, etc.) or licensing activities (response to bulletins, generic letters, etc.). Commitments made in licensee event reports or in response to notices of violation were not included in this audit since those are addressed under the NRC's inspection program. Before the audit, the NRC staff searched the official Agency record system for licensee submittals conveying commitments, and has included in the audit most of the commitments found (see Table 1) by means of the sample, as expanded.

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. Good examples of this type of commitments are those made in DEK's letter dated May 8, 2008 (ADAMS Accession No. ML081300282).

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

Since the management system performed well with the sample size of 24, there is confidence that it would have performed well in a longer audit deliberately selecting some of the excluded types of commitments. Therefore, the audit appears to be adequate in time (4 days), in sample size (24 items) and in sample type (refer to the above discussion in Section 2.1.1) to make conclusions about regulatory commitment management at KPS.

### 2.1.2 Audit Results

The NRC staff reviewed reports generated by the licensee's tracking programs for the commitments listed in Table 1 to evaluate the status of completion. The NRC staff found that the licensee's commitment tracking programs had captured all the regulatory commitments that were identified by the NRC staff before the audit, and that the licensee had implemented the commitments on a timely basis. Table 1 summarizes what the NRC staff observed as the current status of licensee commitments.

## 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 KPS is set forth in procedure LI-AA-110, Rev. 0, "Commitment Management," which is used to manage regulatory commitments and GNP-03.01.01, Rev. 41, when data was collected and Rev. 42, when this report was prepared, "Directive, Implementing Document, and Procedure Administrative Controls," which governs tracing the effect of regulatory commitments on procedures. Based on review of these two cited documents, the NRC staff concludes that the licensee's procedures follow closely the guidance of NEI-99-04 in that they set forth the need for identifying, tracking, and reporting commitments, and they provide a mechanism for changing commitments.

The effectiveness of a procedure can be indicated by the products that are produced by the procedure. As set forth in Section 2.1.1 and Table 1 of this report, the NRC staff found that the licensee had properly addressed the regulatory commitments selected for this audit. As a result of review of the licensee's information, the NRC staff found no reason to differ from the licensee's reported status of the audited commitments. Thus, the NRC staff concludes that the procedure used by the licensee to manage commitments is appropriate and effective.

## 3.0 CONCLUSION

Based on the above audit, the NRC staff concludes that (1) the licensee has implemented or is tracking future implementation of regulatory commitments made to the NRC; and (2) the licensee has implemented an effective program to manage regulatory commitment changes. Further the licensee retains the processes and personnel to continue to do so for the next period of interest.

#### 4.0 INFORMATION TABLES SUPPORTING THIS REPORT

Table 1 – “Summary Table” contains a description of each sample and its disposition at the time of the audit, as well as a judgement of whether the sample was managed effectively. Table 1 is sorted by sample number.

Table 2 – “Detailed Audit Data” contains detailed information, data and notations gathered from the audit. The most efficient means of relating Tables 1 and 2 are to cross-match the audit sample numbers in each column 1. Table 2 is sorted by sample number.

Table 3 – “Notes and Legend” contains notes from the audit experience; any abbreviations used in Tables 1, 2, or the audit report; and any comments, findings, observations, or suggestions. Table 3 was used to reduce the space consumed by Table 2 in compiling and organizing the audit data. Table 3 is sorted alphabetically by the first column.

#### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

The licensee person who supported this audit was MaryJo Haese.

Principal Contributors: Karl Feintuch and Peter Tam

Date: April 11, 2011

TABLE 1 (4 pages)  
KEWAUNEE POWER STATION (KPS)  
AUDIT OF WRITTEN LICENSEE COMMITMENTS  
SUMMARY TABLE

1 - Audit Sample #	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of commitment	6 - Licensee Implementation Status
1	10/29/2007 07-0436B ML073100354	None	None	An updated description of the station blackout alternate alternating current source, including the quality assurance program requirements for the technical support center diesel generator as defined in the Dominion Nuclear Facility Quality Assurance Program Description, will be incorporated into the KPS Updated Safety Analysis Report (USAR) and provided to the Nuclear Regulatory Commission (NRC) in accordance with Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 50.71 (e).	Complete 4/18/2008; NC Closed in a timely manner  NC = not changed wherever it appears
2	11/9/07 07-0416A ML073106750	MD6144	Letter of 2/25/08 granting relief, ML080240029	Prior to use of nonwelded valves with end connections other than flanges at KPS, procedures will be developed for installation of nonwelded valves with end connections other than flanges that address operating experience of NRC Information Notices 92-15, 84-55 and 84-55, Supplement 1. The specific provisions include: a) not mixing the parts from one manufacturer to another, b) following manufacturer's recommended instructions for installing compression fittings, and c) the training or familiarity with the procedure(s) for personnel doing this work.	Complete 1/2/2008; NC Closed in a timely manner
3	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Notify the NRC when the modifications to the auxiliary building (AB) crane to make it single-failure proof are complete	Complete 6/12/08; NC Closed in a timely manner
4	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	All heavy load lifts in or around the spent fuel pool made using the upgraded AB crane lifting system will meet the guidance in NUREG-0612, Section 5.1.6, as follows:  • Special lifting devices, as defined in American National Standards Institute (ANSI) N14.6 will meet the guidance in NUREG-0612, Section 5.1.6(1)(a) and ANSI N14.6-1993, as clarified in Attachment 5 to this license amendment request (LAR).  • Lifting devices not specially designed will meet the guidance	Complete 1/16/09; NC Closed in a timely manner

				<p>in NUREG-0612, Section 5.1.6(1)(b) and American Society of Mechanical Engineers (ASME) B30.9-2003, as clarified in Attachment 5 to this LAR.</p> <ul style="list-style-type: none"> <li>The AB crane will meet the guidance in NUREG-0612, Section 5.1.6(2) and NUREG-0554 as clarified in Attachments 5 and 6 to this LAR</li> <li>Interfacing lift points will meet the guidance in NUREG-0612, Section 5.1.6(3), as clarified in Attachment 5 to this LAR.</li> </ul>	
<b>5</b>	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Crane operator training will meet the guidance in ASME B30.2-2005.	Complete 12/15/08 Closed in a timely manner Closed in a timely manner
<b>6</b>	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Crane maintenance and inspections will meet the guidance in ASME B30.2-1976.	Complete 1/16/09, NC Closed in a timely manner
<b>7</b>	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Revise USAR Section 9.5.2 to remove the dropped cask analysis from the USAR.	Complete 1/15/09: NC Closed in a timely manner
<b>8</b>	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	After LAR approval and relocation of TS 3.8.a.7 to the Technical Requirements Manual (TRM) is authorized, add to the TRM required actions to take if the AB crane lifting system is found not to meet the TRM requirements during a heavy load lift.	Complete 1/16/09; NC Closed in a timely manner
<b>9</b>	11/9/07 07-0465 ML073180499	MD7301	Letter of 5/9/08 (ML081150741), notice of withdrawal of application for amendment	DEK will complete required modifications to the AB crane bridge girder to end-tie connections and confirm bolting material as described in Section 4.2.2.9 of this LAR.	NC, design change recorded as completed on 5/5/08 according to tTrack LAR ML073180499 withdrawn by letter dated 4/11/08 Closed in a timely manner
<b>10</b>	2/8/2008 08-0017 ML080650314	MC4691	Review is ongoing	The KPS USAR will be modified upon final resolution of GSI-191 and response to Generic Letter 2004-02.	In progress; NC Open and being adequately maintained
<b>11a</b>	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	1. DEK will place a restriction in the Kewaunee procedure governing the use of the AB crane prohibiting the use of synthetic slings for heavy load lifts with the AB crane when this crane is in the "Cask Handling" or "Override" modes of operation.	Complete 1/16/09, NC Closed in a timely manner
<b>11b</b>	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	2. For the AB crane bridge welds whose failure could result in a drop of the critical load, DEK will perform nondestructive examinations at least once every four years following completion of initial cold proof load testing of the AB crane.	Complete 1/16/09, NC Closed in a timely manner
<b>11c</b>	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	3. DEK will not perform a heavy lift greater than 50 tons using the AB crane. This commitment will be superseded when a seismic	Complete 1/27/09, NC Closed in a timely manner

				analysis, using NRC-approved methods, demonstrates acceptable results are achieved for the AB crane and establishes a new limit based on lifting heavy loads greater than 50 tons.	
<b>12</b>	7/7/08 08-0211 ML081930317 is a resubmittal of an amendment request from 11/9/07. (i.e., Audit Sample #12 is a pickup from #9 with supplements dated 9/19/08 and 3/17/09)  Note 12-2	MD9221	Amend. No. 205, 4/30/09, ML090570710	1. DEK will submit the results of the analyses performed using the nonlinear seismic analysis methodology described in this LAR.  2. DEK will perform a "push" test to provide empirical data documenting the force required to induce crane trolley and bridge drive wheel rolling with the brakes applied. The results of the test will be provided to the NRC.  3. DEK will have an independent peer review performed of the nonlinear structural model and outputs of the nonlinear analysis to confirm the methodology is appropriate for the application and provide a summary of the review to the NRC.  [The three items are managed as one. The 4th regulatory commitment (RgCm) in the 9/19/09 supplement was not selected for the audit sample - kdf]	Complete 7/15/10; NC [All 3 managed as one - kdf] Closed in a timely manner
<b>13</b>	1/27/09 09-061 ML090510149	ME0435	Letter approving notice of enforcement discretion, 1/29/09, ML090291061	DEK commits to administratively control the amount of fuel oil in each fuel oil storage tank such that a minimum usable amount of 32,858 gallons (including the day tanks) is available to supply each emergency diesel generator (EDG) (without reliance on a portable transfer pump), for the duration of the enforcement discretion.	Complete 6/10/09; NC Closed in a timely manner
<b>14</b>	6/1/09 09-291 ML091600037	MD9408	Review ongoing	The installation of EDG exhaust duct insulation (SAMA 160) will be further evaluated as part of DEK's ongoing performance improvement programs.	In progress; NC Open and being adequately maintained
<b>15</b>	Sample deleted	MD9408	Sample deleted at request of Project Manager making the selection..	See Note 15-5	Sample results not used.
<b>16a</b>	8/17/09 09-469 ML092320093	MD9408	License renewal review ongoing	1. Additional information will be included in the USAR Supplement (License Renewal Application, Appendix A), including license renewal commitments identified in Table A6.0-1, as applicable. These USAR Supplement changes will be consistent with the responses to Requests for Additional Information (RAIs) B2.1.13-5, B2.1.14-3, B2.1.15-1, B2.1.18-1, B2.1.21-1, B.2.1.31-1, and B3.1-	In progress; NC Open and being adequately maintained

				1, are proposed to support approval of the renewed operating license, and may change during the NRC review period.	
<b>16b</b>	8/17/09 09-469 ML092320093	MD9408	License renewal review ongoing	2. The response to RAI B3.2-2 will be provided following reevaluation of the environmental effects of fatigue for the NUREG/CR-6260-required evaluations that used stress-based fatigue monitoring.	Complete and transferred for action by LA001848 Change was adequately managed.
<b>17a</b>	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	(The following commitments are selected from Attachment 5) [Three of nine commitments were selected for audit - kdf]  2. DEK will establish the Technical Specification Bases for Limiting Condition for Operation (LCO) 3.0.8, as adopted, with the applicable license amendment.	In progress; NC Open and being adequately maintained
<b>17b</b>	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	7. DEK will have written procedures available describing compensatory measures to be taken in the event of an intentional or unintentional entry into LCO 3.7.12, Auxiliary Building Special Ventilation (ASV) System, Condition B, "Two ASV trains inoperable due to inoperable ASV boundary."	Complete 12/6/10; NC Closed in a timely manner
<b>17c</b>	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	8. DEK will add procedural direction to perform an extent of condition evaluation and perform additional testing for plausible common failure modes associated with the reactor protection system and the engineered safety features actuation system instrument analog channels.	Withdrew 12/6/10; NC Closed in a timely manner
<b>18</b>	9/25/09 09-597 ML092710045	MD9408	License renewal review ongoing	The revised Work Control Process program will be developed and implemented prior to the period of extended operation.	In progress; NC Open and being adequately maintained
<b>19a</b>	10/15/09 09-645 ML092890560	MD7838	Letter of 4/1/10, ML100880212	The completion dates for the following two commitments have been revised from October 1, 2009, to October 15, 2009. [This RgCm was managed as two separate items - kdf]  1. DEK will revise current fill and vent procedures to provide a means and acceptance criteria to ensure that piping is sufficiently full after system fill and vent. This may include confirmation by UT or other appropriate means.	Complete (This RgCm was changed from 10/1/09 to 10/15/09) Change was adequately managed.
<b>19b</b>	10/15/09 09-645 ML092890560	MD7838	Letter of 4/1/10, ML100880212	2. DEK will revise current inservice test procedures to provide dynamic sweeping as part of the filling of the systems where needed to ensure systems are sufficiently full.	Complete (This RgCm was changed from 10/1/09 to 10/15/09) Change was adequately managed.

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
1	10/29/2007 07-0436B ML073100354	None	None	An updated description of the station blackout alternate alternating current source, including the quality assurance program requirements for the TSC DG as defined in the Dominion Nuclear Facility Quality Assurance Program Description, will be incorporated into the KPS Updated Safety Analysis Report (USAR) and provided to the Nuclear Regulatory Commission (NRC) in accordance with Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) 50.71 (e).	complete 4/18/2008; NC	LC000111, LA000697	No ML#, since no separate response to the NRC	LI*	USAR 8.2.4.3, 8.2.4.12, 8.2 Reference	none	Yes	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
2	11/9/07 07-0416A ML073106750	MD6144	Letter of 2/25/08 granting relief, ML080240029	Prior to use of nonwelded valves with end connections other than flanges at KPS, procedures will be developed for installation of nonwelded valves with end connections other than flanges that address operating experience of NRC Information Notices 92-15, 84-55 and 84-55, Supplement 1. The specific provisions include: a) not mixing the parts from one manufacturer to another, b) following manufacturer's recommended instructions for installing compression fittings, and c) the training or familiarity with the procedure(s) for personnel doing this work.	complete 1/2/2008; NC	LC000142, LA000741 ("LA type" soluti on was incorrect. Data entry was performed by inexperien ced person - self corrected)	no response to the NRC required	LI*	Maintenance Procedure MA KW-GMP-103	None	Yes	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

3	1 - Audit Sample No.
11/9/07 07-0352 ML073170705	2 - DEK Submittal
MD7300	3 - NRC TAC No.
Amend. No. 200, 11/20/08, ML082971079	4 - NRC Issuance
Notify the NRC when the modifications to the Auxiliary Building (AB) crane to make it single-failure proof are complete	5 - Summary of Commitment
complete 6/12/08; NC	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?
LC000141, LA000133	B - KPS Tracking # LC#, CAP#
Note 03-C	C - If closed, then KPS closeout information
LI*	D - Governed by KPS process document # (See Note LI*)
CA069210 says to update procedure GNP- 08.12.02 plus tags.	E - Affected implementing document
None	F - Affected change document
Yes - I was briefly since it reoccur plus find a design change	G - Closed RgCm implemented in timely manner (Yes / No / NA)
NA	H - Open RgCm is adequately Maintained (Yes / No / NA)
NA	I - Changed RgCm is adequately managed (Yes / No / NA)

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
4	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	<p>All heavy load lifts in or around the spent fuel pool made using the upgraded AB crane lifting system will meet the guidance in NUREG-0612, Section 5.1.6, as follows:</p> <ul style="list-style-type: none"> <li>Special lifting devices, as defined in American National Standards Institutes (ANSI) N14.6 will meet the guidance in NUREG-0612, Section 5.1.6(1)(a) and ANSI N14.6-1993, as clarified in Attachment 5 to this license amendment request (LAR).</li> <li>Lifting devices not specially designed will meet the guidance in NUREG-0612, Section 5.1.6(1)(b) and American Society of Mechanical Engineers (ASME) B30.9-2003, as clarified in Attachment 5 to this LAR.</li> <li>The AB crane will meet the guidance in NUREG-0612, Section 5.1.6(2) and NUREG 0554 as clarified in Attachments 5 and 6 to this LAR</li> <li>Interfacing lift points will meet the guidance in NUREG-0612, Section 5.1.6(3), as clarified in</li> </ul>	Complete 1/16/09; NC	LC000141, LA000135	Addressed in TRM [a licensee controlled document kdf] See Note 04-C	LI*	TRM 3.8.1, Rev 0, 1/15/09.	none	Yes, Completion took place within 60 days, as planned	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.									
2 - DEK Submittal									
3 - NRC TAC No.									
4 - NRC Issuance									
5 - Summary of Commitment									
A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?									
B - KPS Tracking # LC#, CAP#									
C - If closed, then KPS closeout information									
D - Governed by KPS process document # (See Note LI*)									
E - Affected implementing document									
F - Affected change document									
G - Closed RgCm implemented in timely manner (Yes / No / NA)									
H - Open RgCm is adequately Maintained (Yes / No / NA)									
I - Changed RgCm is adequately managed (Yes / No / NA)									

5  
11/9/07  
07-0352  
ML073170705  
MD7300  
Amend. No. 200,  
11/20/08,  
ML082971079  
Crane operator training will  
meet the guidance in ASME  
B30.2-2005.  
complete  
12/15/08  
LC000141,  
LA000736  
None to NRC  
LI\*  
Lesson Plan  
M-MD-LP  
2.2.1  
"Cranes", M-  
PM2-LP 1.9.1  
"Crane  
Maintenance /  
Inspection"  
None  
Yes  
Lesson  
Plans had  
guidance  
incorporate  
d in  
reference  
to this  
Amend's  
approval  
NA  
NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
6	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Crane maintenance and inspections will meet the guidance in ASME B30.2- 1976.	complete 1/16/09, NC	LC000141, LA000740	TRM Bases, USAR	LI*	TRM Bases (TRM 3.8.1 pg 381-2) USAR Rev22 Sec. 9, pp 9.5- 9.-10 (6/30	None	Yes Changing NRC ES/SS inspection (6/05) issues were identified with crane inspection procedures concerning B30.2 guidance FCR CR 357649 Revised MAY 04 MIRA-CRM 002 Rev. 2 and TEC- MAY 04 MIRA-CRM 002 Rev. 3 ASME B30.2.4 referenced in procedures	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	7	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	Revise USAR Section 9.5.2 to remove the dropped cask analysis from the USAR.	complete 1/15/09. NC	LC000141, LA000737	USAR	LI*	USAR 14.2.1, 9.5	none	<p>Yes Implement ed in a timely manner and with no issues and implemented in 1/09</p> <p>Much work left to be done USAR revision scheduled 07/08 with the next scheduled update of USAR being 3/31/10</p>	NA	NA	
2 - DEK Submittal															
3 - NRC TAC No.															
4 - NRC Issuance															
5 - Summary of Commitment															
A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?															
B - KPS Tracking # LC#, CAP#															
C - If closed, then KPS closeout information															
D - Governed by KPS process document # (See Note LI*)															
E - Affected implementing document															
F - Affected change document															
G - Closed RgCm implemented in timely manner (Yes / No / NA)															
H - Open RgCm is adequately Maintained (Yes / No / NA)															
I - Changed RgCm is adequately managed (Yes / No / NA)															

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
8	11/9/07 07-0352 ML073170705	MD7300	Amend. No. 200, 11/20/08, ML082971079	After LAR approval and relocation of TS 3.8.a.7 to the technical requirements manual (TRM) is authorized, add to the TRM required actions to take if the AB crane lifting system is found not to meet the TRM requirements during a heavy load lift.	complete 1/16/09; NC	LC000141, LA000735	TRM	LI*	TRM, licensee controlled	none	Yes	NA	NA
9	11/9/07 07-0465 ML073180499	MD7301	Letter of 5/9/08 (ML081150741), notice of withdrawal of application for amendment	DEK will complete required modifications to the AB crane bridge girder to end-tie connections and confirm bolting material as described in Section 4.2.2.9 of this LAR.	NC, design change recorded as completed on 5/5/08 according to Track LAR ML073180499 withdrawn by letter dated 4/11/08	LC000141, LA000732	None to NRC; Design change DCR3629 was completed on 4/22/09; ready to install 9/10/07, which is RgCm closure.	LI*	DCR3629 is the implementing document	none	Yes. Bolting material is confirmed per ECN3629-06	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
10	2/8/2008 08-0017 ML080650314	MC4691	Review is ongoing	The KPS USAR will be modified upon final resolution of GSI-191 and response to Generic Letter 2004-02.	In progress; NC	LC000181, LA000907	None to NRC	LI*	USAR 6.2.9.3 are planned to be changed.	USAR Change Request (UCR) R21-108 dated 9/19/08.	NA	Yes - RTrack allows completion and changed to 6/1/11	NA
11a	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	1. DEK will place a restriction in the Kewaunee procedure governing the use of the AB crane prohibiting the use of synthetic slings for heavy load lifts with the AB crane when this crane is in the "Cask Handling" or "Override" modes of operation.	complete 1/16/09, NC	LC000141, LA000997	None to NRC	LI*	Changed procedure GNP-08.12.02	none	Yes Verified Step 4.15 of GNP-08.12.02 Rev 25, 7/16/2010	NA	NA
11b	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	2. For the AB crane bridge welds whose failure could result in a drop of the critical load, DEK will perform nondestructive examinations at least once every four years following completion of initial cold proof load testing of the AB crane.	complete 1/16/09, NC	LC000141, LA000998	None to NRC; entered Preventive Maintenance Program, RE89105	LI*	Preventive Maintenance (PM) Task - PM 53065. Examinations IAW AWS-01.1-1994. PM Card has TS Amend. Referenced.	none	Yes Preventive Maintenance Program RE89105 which notes it is a RgCm.	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
11c	6/2/08 08-0113 ML081550342	MD7300	Amend. No. 200, 11/20/08, ML082971079	3. DEK will not perform a heavy lift greater than 50 tons using the AB crane. This commitment will be superseded when a seismic analysis, using NRC-approved methods, demonstrates acceptable results are achieved for the AB crane and establishes a new limit based on lifting heavy loads greater than 50 tons.	complete 1/27/09, NC	LC000141, LA000999	None to NRC; changed procedure GNP-08.12.02, "Control for use of cranes in protected area"	LI*	Chnged procedure GNP-08.12.02	none	Yes GNP-08.12.02 change done 7/8/10	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
12	7/7/08 08-0211 ML081930317 is a resubmittal of an amendment request from 11/9/07. (i.e., Audit Sample #12 is a pickup from #9 with supplements dated 9/19/08 and 3/17/09)  Note 12-2	MD9221	Amend. No. 205, 4/30/09, ML090570710	1. DEK will submit the results of the analyses performed using the nonlinear seismic analysis methodology described in this LAR.  2. DEK will perform a "push" test to provide empirical data documenting the force required to induce crane trolley and bridge drive wheel rolling with the brakes applied. The results of the test will be provided to the NRC.  3. DEK will have an independent peer review performed of the nonlinear structural model and outputs of the nonlinear analysis to confirm the methodology is appropriate for the application and provide a summary of the review to the NRC.  [The three items are managed as one. The 4th (RgCm) Regulatory Requirement in the 9/19/09 supplement was not selected for the audit sample - kdf]	complete 7/15/10; NC [All 3 managed as one - kdf]	LC000228 (No LAs are needed since the actions can be managed as a group within the LC number.)	SN 08-211 sent to NRC on 7/7/08 (DEK accomplished all RgCm in the sample. Submitted to the NRC within the 9/19/08 sample)	LI*	Push Test details provided in 9/19/08 Supplement	none	Yes	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
13	1/27/09 09-061 ML090510149	ME0435	Letter approving notice of enforcement discretion, 1/29/09, ML090291061	DEK commits to administratively control the amount of fuel oil in each fuel oil storage tank such that a minimum usable amount of 32,858 gallons (including the day tanks) is available to supply each emergency diesel generator (EDG) (without reliance on a portable transfer pump), for the duration of the enforcement discretion.	complete 6/10/09; NC	LC000315 (No LA number - one item only)	None to NRC	LI*	USAR Rev 22 update 6/30/10 pg 8.2-18, Section 8.2.3.1	none	Yes Control is USAR add	NA	NA
14	6/1/09 09-291 ML091600037	MD9408	Review ongoing	The installation of EDG exhaust duct insulation (SAMA 160) will be further evaluated as part of DEK's ongoing performance improvement programs.	In progress; NC	LC000345, LA001560	None to NRC	LI*	Note 14-E	Not yet determined	No	Yes	NA
15	Sample deleted	MD9408	Sample deleted at request of Project Manager making the selection..	See Note 15-5	sample results not used.	sample results not used	sample results not used	LI*	sample results not used	sample results not used	sample results not used	sample results not used	sample results not used

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
16a	8/17/09 09-469 ML092320093	MD9408	License renewal review ongoing	1. Additional information will be included in the USAR Supplement (License Renewal Application, Appendix A), including license renewal commitments identified in Table A6.0-1, as applicable. These USAR Supplement changes will be consistent with the responses to Requests for Additional Information (RAIs) B2.1.13-5, B2.1.14-3, B2.1.15-1, B2.1.18-1, B2.1.21-1, B2.1.31-1, and B3.1-1, are proposed to support approval of the renewed operating license, and may change during the NRC review period.	In progress; NC	LC000343, LA001541	Reportable through USAR change	LI*	USAR (pages to be defined; expected to be complete 4/4/11)	none	NA	Yes	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
16b	8/17/09 09-469 ML092320093	MD9408	License renewal review ongoing	2. The response to RAI B3.2-2 will be provided following reevaluation of the environmental effects of fatigue for the NUREG/CR-6260-required evaluations that used stress-based fatigue monitoring.	Complete and transferred for action by LA001848	LC000343, LA001542 [original tracking] transferred to LC000392, LA001848 [Observation 16b-B]	Transferred to LA001848	LI*	Letter SN 10-033 dated 2/2/10 (responded to RAI B3.2-2)	No change to RgCm. Change was to tTrack to record transfer from LA001542 to LA001848	Yes	NA	Yes RgCm itself not changed (transfer was successful)
17a	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	(The following commitments are selected from Attachment 5) [Three of nine commitments were selected for audit - kdf]  2. DEK will establish the Technical Specification Bases for Limiting Condition for Operation (LCO) 3.0.8, as adopted, with the applicable license amendment.	In progress; NC	LC000407, LA001897	None to NRC	LI*	Tech Spec Bases LCO 3.0.8	none	NA	Yes	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
17b	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	7. DEK will have written procedures available describing compensatory measures to be taken in the event of an intentional or unintentional entry into LCO 3.7.12, Auxiliary Building Special Ventilation (ASV) System, Condition B, "Two ASV trains inoperable due to inoperable ASV boundary."	Complete 12/6/10; NC	LC000407, LA001902	Procedure	LI*	Procedure OP KW-AOP- GEN-005 "Unplanned Barrier Control	none	Yes	NA	NA
17c	9/24/09 09-491 ML092440398	ME2139	Conversion to Improved TS review ongoing	8. DEK will add procedural direction to perform an extent of condition evaluation and perform additional testing for plausible common failure modes associated with the reactor protection system and the engineered safety features actuation system instrument analog channels.	Withdrew 12/6/10; NC	LC000407, LA1903	Withdrew via 8/18/2010 Supple	LI*	Letter SN10- 457 to NRC withdrew commitment (Letter is 8/18/10 supplement on TAC ME2139)	none	Withdrew	NA	NA

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

1 - Audit Sample No.	2 - DEK Submittal	3 - NRC TAC No.	4 - NRC Issuance	5 - Summary of Commitment	A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?	B - KPS Tracking # LC#, CAP#	C - If closed, then KPS closeout information	D - Governed by KPS process document # (See Note LI*)	E - Affected implementing document	F - Affected change document	G - Closed RgCm implemented in timely manner (Yes / No / NA)	H - Open RgCm is adequately Maintained (Yes / No / NA)	I - Changed RgCm is adequately managed (Yes / No / NA)
18	9/25/09 09-597 ML092710045	MD9408	License renewal review ongoing	The revised Work Control Process program will be developed and implemented prior to the period of extended operation.	In progress; NC	LC000394, LA001858	Not closed	LI*	Revised work control program document (TBD)	none	NA	Yes	NA
19a	10/15/09 09-645 ML092890560	MD7838	Letter of 4/1/10, ML100880212	The completion dates for the following two commitments have been revised from October 1, 2009, to October 15, 2009. [This RgCm was managed as two separate items - kdf]  1. DEK will revise current fill and vent procedures to provide a means and acceptance criteria to ensure that piping is sufficiently full after system fill and vent. This may include confirmation by ultrasonic testing or other appropriate means.	Complete (This RgCm was changed from 10/1/09 to 10/15/09)	LC000239, LA001178	Letter SN 09- 645 dated 9/15/09 to NRC	LI*	Note 19-E	Change to date only (10/1/09 to 10/15/09)	Yes	NA	Yes

Table 2 - Kewaunee Power Station RgCm Data Table - Detailed Audit Data

19b	10/15/09 09-645 ML092890560	MD7838	Letter of 4/1/10, ML100880212	2. DEK will revise current inservice test procedures to provide dynamic sweeping as part of the filling of the systems where needed to ensure systems are sufficiently full.	Complete (This RgCm was changed from 10/1/09 to 10/15/09)	LC000239, LA001179		LI*	Note 19-E	Uses LI* - commitment change evaluation Change to date only (10/1/09 to 10/15/09)	Yes	NA	Yes														
<b>1 - Audit Sample No.</b>		<b>2 - DEK Submittal</b>		<b>3 - NRC TAC No.</b>		<b>4 - NRC Issuance</b>		<b>5 - Summary of Commitment</b>		<b>A - Action Completed (date) Action in Progress (no date) Not Changed / Changed to what?</b>		<b>B - KPS Tracking # LC#, CAP#</b>		<b>C - If closed, then KPS closeout information</b>		<b>D - Governed by KPS process document # (See Note LI*)</b>		<b>E - Affected implementing document</b>		<b>F - Affected change document</b>		<b>G - Closed RgCm implemented in timely manner (Yes / No / NA)</b>		<b>H - Open RgCm is adequately Maintained (Yes / No / NA)</b>		<b>I - Changed RgCm is adequately managed (Yes / No / NA)</b>	

<b>Topic or Word / Symbol</b>	<b>Note, legend or discussion</b>
ADAMS	Agencywide Document Access and Management System
Amd or Amend.	amendment
Audit observation (general)	The Preventive Maintenance Program would be improved if the Comment field on the PM (preventive maintenance) Data Sheet informed the user that the sheet had a RgCm associated with it.
Audit observation (training)	Commitment management staff should consider preparing a Guideline to ensure consistent input to tTrack by stakeholders making infrequent use of tTrack.
Audit observation 16b-B	The ability to transfer tracking from one LC/LA set to another is demonstrated in Sample 16b. The rationale for the transfer is explained in LA001848: The NRC wanted more items for another purpose. KPS consolidated LA001542 with LA001848.
CFR	Code of Federal Regulations
Column headings and cell designations	Columns are labeled numbers 1 through 5 and letters A through I. Sample numbers are listed in column 1. Notes are designated as "Note (row) - (column)"
Commitment management staff	Persons identified as making routine, standardized data entry into tTrack, identified as Noreen Wenborne, MaryJo Haese, and Thomas Breene during the course of RgCm data collection.
ECN	Engineering Change Notice
Generic Letter 2004-02	"Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors," September 13, 2004
GSI-191	"Experimental Studies of Loss-of-Coolant Accident-Generated Debris Accumulation and Head Loss with Emphasis on the Effects of Calcium Silicate Insulation," May 2005
kdf	Karl D. Feintuch (Mainly used in combination with brackets to indicate an auditor comment.)
KPS	Kewaunee Power Station
LA	Licensing Action; one or more LA can be associated with one LC
LC	Licensing Commitment
LI*	In this report LI* represents LI-AA-110, Rev. 0, "Commitment Management," which governs the management of RgCm. In addition, GNP-03.01.01, Rev. 41 during RgCm Audit and Rev 42 when the Report was issued, "Directive, Implementing Document, and Procedure Administrative Controls" (commonly referred to at KPS as the "Procedure on procedures") governs tracing the effect of RgCm on procedures. Therefore, the management of RgCm, when it affects procedures is controlled by a combination of these 2 procedures.
ML#	"MLnnnnnnnn" (i.e. ML followed by 9 digits) is the identifier used by the NRC to access documents and records within its Agencywide Document Access and Management System (ADAMS) document control system.
NC	Not Changed (as used in column A)

Topic or Word / Symbol	Note, legend or discussion
Note 01-G, -H, -I (i.e., headings in column G, H and I)	A "Yes" in Column G, H, or I indicates that the RgCm was successfully managed according to the description in the heading. NA applies if the particular column does not apply. As examples, for a closed RgCm, "open" is NA; for unchanged RgCm, "changed" does not apply. Thus "No" would only appear in Columns G, H or I if the RgCm was not adequately managed.
Note 03-C	NRC notified via submitted document SN 08-0113 dated 6/2/08, ML081550342
Note 04-C	The Technical Requirements Manual (TRM) is a licensee controlled document for managing requirements that the NRC has approved to be transferred from control by the Technical Specifications.(TS)
Note 12-2, Audit Observation and Audit Finding	Observation: Regarding the July 7, 2008 application, the licensing group should define a closeout event at which to terminate its ownership of a RgCm intended for its downstream stakeholders (i.e., Design, Operations, Training, as examples) Audit Finding: DEK lacks a documented instruction in LI-AA-110, "Commitment Management," that instructs the commitment management staff to review all incoming / outgoing correspondence for impact on existing RgCm. Heretofore, commitment management staff has been performing this action without a documented instruction, within LI-AA-110, to do so.
Note 14-E	[Suggestion pertaining to on-going RgCm: Stakeholders should report completion plans to Licensing staff for tTrack entry and for future reference.- kdf]
Note 15-5	The sample contained proprietary information, an attribute not needed to assemble a valid audit sample. The audit results for the sample were consistent with results from other samples, and its removal did not change the findings of the audit. Further, the sample population grew from the original 19 selections to a net population of 24 (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11a, 11b, 11c, 12, 13, 14, 15 omitted, 16a, 16b, 17a, 17b, 17c, 18, 19a, 19b) to track the management of separate RgCm parts.
Note 19-E	Affected procedures (21 documents, as indicated by separate serial numbers): OP-KW-NOP-RHR-001, -003 SP-34-099A, -099B OP-KW-NOP-SI-002 OP-KW-MOP-RHR-001A, -001B, -002A, -002B, -003A, -005A, -005B, -006, -006A, -006B OP-KW-NOP-SI-001 [possible typo in KPS text: NOP should possibly be MOP - kdf], -002, -004 OP-KW-MOP-ICS-001, -002, -003
Note on references to TS	In this audit TS references are to the Custom Technical Specifications (CTS), which preceded the conversion to Improved Technical Specifications (ITS) on February 2, 2011.
Note on sample characteristics for the sample size of 24, categorized from audit results	RgCm items closed and remaining the same = 1, 2, 3, 4, 5, 6, 7, 8, 9, 11a, 11b, 11c, 12, 13, 17b, 17c (16 items) RgCm items changed and closed = 16b, 19a, 19b (3 items) RgCm items open and remaining the same = 10, 14, 16a, 17a, 18 (5 items) RgCm items open and changed = none

<b>Topic or Word / Symbol</b>	<b>Note, legend or discussion</b>
Note row-column	A discussion pertaining to Table 2, row number and column number, which is inserted in Table 3 due to space limitation. (Example: Note 01-G, pertains to row 01, column G on Table 2.)
NRC Information Notice 84-55	"Seal Table Leaks at PWRs," July 6, 1984
NRC Information Notice 84-55, Supplement 1	"Seal Table Leaks at PWRs," May 14, 1985
NRC Information Notice 92-15	"Failure of Primary System Compression Fitting," February 24, 1992
NUREG/CR-6260	"Application of NUREG/CR-59999 Interim Fatigue Curves to Selected Nuclear Power Plant Components," 1995
NUREG-0554	"Single-Failure-Proof Cranes for Nuclear Power Plants," May 1979
NUREG-0612	"Control of Heavy Loads at Nuclear Power Plants: Resolution of Generic Technical Activity A-36," July 1980
RgCm	Regulatory Commitment, as interpreted by NEI 99-04 (the industry document governing RgCm management) and LIC-105 (the NRC document governing RgCm audits)
SAMA 160	SAMA 160 is described in the license renewal submittal as "Insulate EDG Exhaust Ducts." The context is that insulating the EDG exhaust ducts would reduce the heat load in the room and provide additional time to align alternate room cooling in the event that room cooling has failed.
Suggestion	A comment by auditor kdf, not specific to a RgCm, but offered as a suggestion. No action or response is expected.
Suggestion (based on Audit Items 11a, b, c)	[Commitment management staff should monitor processes that cause users to contact them for RgCm information and arrange to add RgCm information to relevant databases. - kdf]
Supple	Supplement
Title 10	The section of the Code of Federal Regulations pertaining to "Energy"
TRM	Technical Requirements Manual - a licensee controlled document for managing plant specific technical requirements. The TRM is incorporated by reference into the Updated Safety Analysis Report (USAR)
TS	Technical Specifications, as described in 10 CFR 50.36
tTrack	Name of database used to track RgCm.
UCR	USAR Change Request
USAR	Updated Safety Analysis Report

April 11, 2011

Mr. David A. Heacock  
President and Chief Nuclear Officer  
Dominion Nuclear  
Dominion Energy Kewaunee, Inc.  
Innsbrook Technical Center  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: KEWAUNEE POWER STATION - AUDIT OF THE LICENSEE'S MANAGEMENT  
OF REGULATORY COMMITMENTS (TAC NO. ME3804)

Dear Mr. Heacock:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the 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. Licensees are encouraged to use NEI 99-04 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and regulatory commitments are being effectively implemented. Accordingly, an audit was performed on the Kewaunee Power Station site on December 6-9, 2010, approximately 3 years from the last audit. Based on the audit, the NRC staff concludes that (1) Dominion Energy Kewaunee, Inc. (the licensee) has implemented, or is tracking future implementation of, regulatory commitments made to the NRC; and (2) the licensee had implemented an effective program to manage regulatory commitment changes. Details of the audit are set forth in the enclosed audit report. This completes the NRC staff's efforts on this issue.

Sincerely,  
*/RA/*

Karl Feintuch, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Audit Report

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