



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

October 29, 2010

Mr. Matthew W. Sunseri
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, KS 66839

SUBJECT: WOLF CREEK GENERATING STATION - AUDIT OF LICENSEE
REGULATORY COMMITMENT MANAGEMENT PROGRAM (TAC NO. ME3987)

Dear Mr. Sunseri:

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the 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 licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

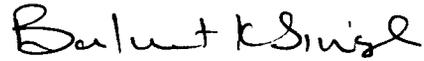
An audit of Wolf Creek Generating Station (WCGS), commitment management program was performed at plant site during the period August 17-19, 2010. The NRC staff concludes, based on the audit, that Wolf Creek Nuclear Operating Corporation (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes at WCGS. Based on the results of this audit, the NRC concludes that WCGS has an adequate program to implement and manage regulatory commitments. The details of the results of the audit with deficiencies identified during the audit are described set forth in the enclosed audit report.

M. Sunseri

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If there are any questions, I can be contacted at (301) 415-3016.

Sincerely,



Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure
As stated

cc w/encl: Distribution via Listserv



UNITED STATES
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK GENERATING STATION

DOCKET NO. 50-482

1.0 INTRODUCTION AND BACKGROUND

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), the 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 (commitments) and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that commitments are implemented and that changes to the 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 that the 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 licensing activities (bulletins, generic letters, etc.). The audit is to be performed once every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Wolf Creek Generating Station (WCGS) commitment management program was performed at the plant site during the period August 17-19, 2010. The audit reviewed commitments made by Wolf Creek Nuclear Operating Corporation (WCNOC, the licensee) since the previous audit on August 20-21, 2007, which was documented in an audit report dated

Enclosure

October 31, 2007 (ADAMS Accession No. ML072780003). 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 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.

The audit addressed a sample of commitments made during the review period. The audit focused on commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) and licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff performed a search in ADAMS for the licensee's submittals since the last audit and selected a representative sample of commitments for verification. The identified list of commitments was forwarded to the licensee on July 20, 2010, with a request to locate documentation for the listed commitments ahead of the NRC staff audit. The licensee did not perform a self-assessment of the commitments identified 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., responding 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, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

The licensee has implemented Procedure AI 26D-001, "Commitments Management System," which identifies the methods and responsibilities for the maintenance of commitments and the Regulatory Commitment Management System Database (database), which is used to ensure that the commitments are properly identified, tracked, closed out, revised/changed, or deleted. The licensee uses the database to track the status and manage the closure of commitments at WCGS effectively. Procedure AI 26D-001 for the licensee's commitment management program is consistent with the guidance provided by NEI 99-04.

As discussed above, the database provides acceptable tools and guidance for the licensee to capture the NRC guidance on commitment management programs. The licensee enters the commitments made to the NRC into the database. The commitments are labeled as NRC commitments. Each commitment is numbered and described by a commitment title and brief description. The status of the commitments, implementation dates, target implementation document information associated with each specific commitment, and comments are captured in the database.

The documents furnished by the licensee during the audit included summary sheets from the database providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation incorporating the commitments). The NRC staff reviewed the documents and summarized the results of the review of the selected commitments in the attachment to this audit report.

The NRC staff's audit was intended to confirm that the licensee has documented its implementation of its commitments made to the NRC staff as part of past licensing communications, and the commitments that had not yet been implemented or incorporated in design bases documents are captured in an effective manner for future implementation.

The NRC staff's audit of the licensee's commitment management program for WCGS identified the following deficiencies (refer to the Attachment to this report for the audit item numbers and the description of each individual item):

Commitment Management Program Deficiencies:

- Item No. 8f: The database stated that the commitment completion date was December 30, 2009, while it was still shown as OPEN. The WCNO letter dated June 9, 2008 (ET 08-0036), revised the completion date to March 23, 2023, and the commitment was actually open. At the conclusion of this audit, the licensee was in the process of correcting the error.
- Item Nos. 9a, 9b, and 9c: The licensee did not enter in the database the commitment made in WCNO letter dated October 10, 2008 (ET 08-0045). The database entry subsequently was made on August 18, 2010. Items 9a and 9b are due for implementation later. Item 9c has already been implemented. Also, the database did not accurately reflect all of the associated work order numbers for Item 9c. At the conclusion of this audit, the licensee was in the process of correcting the errors.
- Item No. 12: The database indicated the status as OPEN with a required closing date of March 4, 2010. The licensee had not received the approval of the amendment from NRC. The database was corrected to revise the estimated closing date as October 31, 2010.
- Item No. 16: The database showed the item as OPEN; however, the application dated September 3, 2009 (WO 09-0022), was not accepted by NRC and a new application was submitted by WCNO letter dated November 20, 2009 (WO 09-0039). Hence, the database did not reflect the accurate status of the commitment.

- Item No. 19d: The commitment made under this item was revised by the licensee by WCNO letter dated November 16, 2007 (WO 07-0030), to take exception to Item 47. However, Procedure EDMG-T01 does not recognize the exception taken by the WCNO letter dated November 16, 2007, and needs revision to recognize the exception.

Other typographical errors identified during the audit are described in the Attachment.

The results of the review indicated that the commitments were implemented and/or incorporated satisfactorily and the licensee has an effective commitment management program, with the exception of the deficiencies detailed above. The deficiencies identified above had no safety significance and the licensee took immediate action to ensure that errors are corrected. The results of the audit are detailed in the Attachment to this report.

Also, the target document (e.g., procedures) listed the commitments contained in the document in a section titled "Commitments." To ensure that the commitments are not removed or changed in future revisions to the target documents, the target documents clearly identified the areas incorporating specific commitments by reference.

Based on the results of the on-site audit, the NRC staff believes the licensee has implemented the commitment management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04, except for the deficiencies identified 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 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 WCGS is contained in Procedure AI 26D-001 (Section 6.5). The primary focus of the audit was to ensure that the commitments are implemented without a change and if a change is made, it is in accordance with the approved plant procedures and with the approval of the plant's management. The audit also verified that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that the licensee's 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.

No other commitment changes were identified during the audit, except for changes to the implementation dates for some of the commitments. In all such cases, the NRC staff was appropriately informed.

3.0 OBSERVATIONS AND RECOMMENDATIONS

Deficiencies in the commitment management program identified during the audit are identified in Section 2.1 of this report. No other specific observations or recommendations were identified.

3.0 OBSERVATIONS AND RECOMMENDATIONS

Deficiencies in the commitment management program identified during the NRC audit are identified in Section 2.1 of this report. No other specific observations or recommendations were identified. There were no specific recommendations identified by the audit performed in August 2007 for future implementation and, therefore, were not the scope of review for this audit.

4.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the commitment management program effectively, and implemented commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04. The licensee took immediate action to correct the deficiencies identified during the audit. The deficiencies identified during the audit did not have any safety significance.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

William Mulenburg
Randy Ptacek

Principal Contributor: B. Singal

Date: October 29, 2010

Attachment:
Results of Regulatory Commitments Audit

**Results of Regulatory Commitment Audit Performed August 17-19, 2010,
at Wolf Creek Generating Station (WCGS)
Wolf Creek Nuclear Operating Corporation (WCNOC)
Docket No. 50-482**

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
1	WCNOC letter ET 07-0037 dated 8/20/2007 (ADAMS Accession No. ML072400403)	License Renewal, Time - Limited Aging Analysis	Prior to the extended operation, metal fatigue of reactor coolant pressure boundary will be enhanced.	To be completed by 3/11/2025.	Open (tracked under Commitment No. (CN) 2006-218).
2	NRC letter dated 8/23/2007 (ADAMS Accession No. ML072220355) WCNOC letter WO 07-0013, dated 6/22/2007 (ADAMS Accession No. ML071790404)	Effective Dose Equivalent Weighing Factors for External Radiation Exposure	a) The licensee will monitor the part of the whole body within each compartment (and/or composite compartment) that receives the highest dose. Wolf Creek Generating Station (WCGS) Procedure, RPP 07-106, "Use of Special Dosimetry," provides guidance for determining dosimeter selection and placement and will be revised consistent with that found in NRC Inspection Procedure 71121.01, issue date 03/06/02. Procedure RPP 07-106 will be revised with in 90 days of NRC approval.	New Procedure RPP 07-406 issued 11/7/2007.	Closed.
			b) WCGS Procedure RPP 07-0405, "Exposure History Files," provides guidance for tracking and reporting of individual's occupational radiation exposure and will be revised such that the Effective Dose Equivalent from External Sources (EDE _{ex}) (when used) will be reported in place of the Deep Dose Equivalent (DDE), as discussed in RIS 2004-01. Procedure RPP 07-0405 will be revised within 90 days of NRC approval.	New Procedure RPP 07-406 issued 11/7/2007.	Closed.
			c) The licensee will account for dose consistent with the guidance of the Standard as follows: 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 Effective Dose Equivalent (EDE) will be the sum of each DDE measurement multiplied by its appropriate compartment factor. 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. Procedure RPP 07-106 will be revised with in 90 days of NRC approval.	New Procedure RPP 07-406 issued 11/7/2007.	Closed.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
3	WCNOC letter ET 07-0042, dated 9/27/2007 (ADAMS Accession No. ML072770010)	License Renewal, Nickel Alloy Aging Management Program	The Wolf Creek Nuclear Operating Corporation (WCNOC) Nickel Alloy Aging Management Program Management Program will be supplemented with implementation of applicable (1) NRC Orders, Bulletins and Generic Letters associated with nickel alloys and (2) staff-accepted industry guidelines, (3) participate in the industry initiatives, such as owners group programs and the EPRI Materials Reliability Program, for managing aging effects associated with nickel alloys, (4) upon completion of these programs, but not less than 24 months before entering the period of extended operation, WCNOC will submit an inspection plan for reactor coolant system nickel alloy pressure boundary components to the U.S. Nuclear Regulatory Commission (NRC) for review and approval. Upon completion of these supplemental requirements, the WCGS Nickel Alloy Aging Management inspection plan will be submitted for NRC review and approval at least 24 months prior to entering the period of extended operation.	To be completed by 3/11/2023.	Open (tracked under CN 2007-251).
4	NRC letter dated 3/21/2008 (ADAMS Accession No. ML080650219) WCNOC letter ET 07-0004 dated 3/14/2007 (ADAMS Accession No. ML070800193)	Replacement of Main Steam and Main Feedwater Isolation Valves	The license amendment will be implemented prior to startup from Refueling Outage 16. Final TS Bases changes will be implemented pursuant to TS 5.5.14 at the time the amendment is implemented.	Amendment 176 to Technical Specification 5.5.14 and associated Bases changes were implemented 4/4/2008.	Closed. Note: The RCMS database (database) incorrectly stated Amendment 176 as Commitment 176.
5	WCNOC letter ET 08-0024 dated 3/30/2008 (ADAMS Accession No. ML081000126)	Interim Alternate Repair Criterion to TS 5.5.9, "Steam Generator (SG) Program."	For integrity assessments, the ratio of 2.5 will be used in the completion of both the condition monitoring (CM) and operational assessment (OA) upon implementation of the Interim Alternate Repair Criterion (IARC). For example, for the CM assessment, the component of leakage from the lower 4 inches for the most limiting steam generator (SG) during the prior cycle of operation will be multiplied by a factor of 2.5 and added to the total leakage from any other source and compared to the allowable accident analysis leakage assumption. For the OA, the difference in leakage from the allowable limit during the limiting design basis accident minus the leakage from the other sources will be divided by 2.5 and compared to the observed leakage. An administrative limit will be established to not exceed the calculated value. The CM report and preliminary operational assessment will be prepared prior to MODE 4.	Westinghouse Report SG-CDME-08-15 issued 5/8/2010.	Closed. The database incorrectly indicated a closure date of 5/2/2008, but was revised on 8/19/2010 to reflect it correctly as 5/8/2008.
6	NRC letter dated 4/4/2008 (ADAMS Accession No. ML080840004)	Interim Alternate Repair Criterion to TS 5.5.9, "Steam Generator (SG) Program."	Same as previous WCNOC letter ET 08-0024.	N/A.	N/A.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
7	WCNOC letter ET 08-0030 dated 5/15/2008 (ADAMS Accession No. ML081440051)	License Renewal, Closure of the Metal Fatigue Analysis Open Items	<p>a) Configuration of charging nozzle - Validate the presence or absence of charging nozzle thermal sleeves. If WCNOC determines that the sleeves are not present, the analyses will be re-performed by 12/30/2009.</p> <p>b) Metal fatigue baseline Cumulative Usage Factor (CUF) - Backward projection of CUF was used for NUREG/CR 6260 locations (Surge Line Hot Leg Nozzle, and Charging Nozzles). While the ratios used for back projection do incorporate accumulated fatigue effects from all transients that occurred during Period 2, it does not account for transients which occurred more frequently in Period 1 than Period 2. Therefore, WCNOC will prepare an updated baseline for the pressurizer hot leg surge nozzle based on the additional insurge / outsurge cycles accumulated in a pre-MOP [heat-up and cool-down operating procedures] environment. Additionally WCNOC will update the baseline for the charging nozzles with consideration for the differential contribution of fatigue for each category of charging event by 12/30/2009.</p>	<p>Completion date changed to 3/11/2023 by WCNOC letter ET 08-0036 dated 6/9/2008 (ADAMS Accession No. ML081700279).</p> <p>Being tracked under WCNOC letter ET 07-0046 dated 10/3/2007, item 38 (ADAMS Accession No. ML072840051).</p>	<p>Open (tracked under CN 2008-320).</p> <p>Closed.</p>

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
8	WCNOC letter ET 08-0036 dated 6/9/2008 (ADAMS Accession No. ML081700279)	License Renewal – Closure of the Metal Fatigue Analysis Open Items	a) Prior to the extended operation, metal fatigue of reactor coolant pressure boundary will be enhanced. This commitment is the repeat of commitment from letter ET 07-0037.	To be completed by 3/11/2025.	Open (tracked under ID 2006-218).
			b) ASME III Subsection NG Fatigue Analysis of reactor pressure vessel internals – WCNOC will obtain a design report amendment to either quantify the increase in high-cycle fatigue effects, or to confirm that the increase will be negligible. WCNOC will complete this action before the end of the current licensed operating period.	Closed by WCNOC letter ET 07-0058 dated 11/30/2007 (ADAMS Accession No. ML073460041).	Closed.
			c) Assumed thermal cycle count for allowable secondary stress range reduction factor in B31.1 and ASME III Class 2 and 3 piping - WCNOC will complete the reanalysis of the reactor coolant sample lines and any additional corrective actions or modifications indicated by them, before the end of the current licensed operating period.	Closed by WCNOC letter ET 07-0058.	Closed.
			d) Metal fatigue baseline CUF - Backward projection of CUF was used for NUREG/CR-6260 locations (Surge Line Hot Leg, Nozzle, Charging Nozzles), and for several locations not covered by NUREG/CR-6260 locations (Pressurizer Lower Head, Pressurizer Spray Nozzle, Pressurizer Surge Nozzle, Pressurizer Surge Line, S/G Feedwater Nozzles). While the ratios used for back-projection do incorporate accumulated fatigue effects from all transients that occurred during PERIOD 2, it does not account for transients, which occurred more frequently in PERIOD 1 than during PERIOD 2. Therefore, WCNOC will prepare an updated baseline that adequately bounds transients experienced prior to the start of CUF monitoring. The existing baseline CUF for all monitored locations will be increased to bind the potential CUF contribution from the transients that were under-represented in the existing baseline.	Closed by WCNOC letters ET 08-0007 dated 1/25/2008 (ADAMS Accession No. ML080350012); ET 08-0037 dated 6/20/2008 (ADAMS Accession No. ML081790152); and ET 08-0046 dated 9/30/2008 (ADAMS Accession No. ML082810502)	Closed.
			e) Configuration of charging nozzles - Validate the presence or absence of charging nozzle thermal sleeves. If WCNOC determines that the sleeves are not present, the analyses will be re-performed and the new analyses will be incorporated into the WCGS fatigue monitoring program.	To be completed by 3/11/2023.	Open (tracked under CN 2008-320).
			f) Metal fatigue baseline CUF - Backward projection of CUF was used in the WCGS fatigue monitoring program for NUREG/CR-6260 locations (Surge Line Hot Leg Nozzle, and Charging Nozzles). While the ratios used for back-projection do incorporate accumulated fatigue effects from all transients that occurred during Period 2, it does not account for transients, which occurred more frequently in Period 1 than Period 2. Therefore, WCNOC will prepare a fatigue monitoring program updated baseline for the pressurizer hot leg surge nozzle based on the additional insurge/outsurge cycles accumulated in a pre-MOP environment. Additionally WCNOC will update the fatigue monitoring program baseline for the charging nozzles with consideration for the differential contribution of fatigue for each category of charging event.	To be completed by 3/11/2023.	Open (tracked under CN 2008-323). Note: The database inaccurately specifies the completion date as 12/30/2009 with an open status. The commitment date was changed by WCNOC letter ET 08-0036 to 3/23/2023.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
9	WCNOC letter ET 08-0045 dated 10/10/2008 (ADAMS Accession No. ML082950487)	Nine Month Response to Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling Decay Heat Removal, and Containment Spray Systems."	a) WCNOC will monitor the industry resolution of the gas accumulation technical Specification (TS) issues and submit a license amendment request, as appropriate, within one year following NRC approval of the TSTF or the CLIIP Notice of Availability.	Licensee missed entering this commitment in the database; entered on 8/18/2010.	Open. NRC staff has not approved the TSTF. Commitment will be incorporated within 1 year from the date of NRC approval.
			b) WCNOC will resolve the adequacy of implementation of a change to the Bases for TS 3.5.2.3 consistent with resolution of generic TS changes via the TSTF traveler process by one year following the NRC approval of the TSTF or the CLIIP Notice of Availability.	Licensee missed entering this commitment in the database; entered on 8/18/2010.	Open. NRC staff has not approved the TSTF. Commitment will be incorporated within 1 year from the date of NRC approval.
			c) WCNOC will install twenty three additional vents based on metrology results and drawing reviews prior to startup following Refueling Outage 17.	Licensee missed entering this commitment in the database; entered on 8/18/2010. Based on the review of Change Package 012869 and WOs 08-310289-000, 08-310289-007, 08-310289-015, and 08-310289-024, commitment has been incorporated.	Closed. The database did not accurately reflect all the WO numbers. Also, Change package was erroneously referenced as 12896 in place of 12869.
10	WCNOC letter ET 08-0049, dated 10/30/2008 (ADAMS Accession No. ML083120428)	Submerged Safety-Related Medium Voltage Power Cables	WCNOC will periodically inspect and dewater manholes containing safety related medium voltage cables. Experience obtained from dewatering will be evaluated and the dewatering frequency adjusted to prevent long-term submergence of safety-related medium voltage cables, as conditions permit. Dewatering will be contingent on plant conditions, plant schedule, weather, and equipment availability.	WOs 09-316995-000 to 09-316999-000 issued to drain manholes.	Closed.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
11	NRC letter dated 2/12/2009 (ADAMS Accession No. ML083150403)	Submerged Safety-Related Medium Voltage Power Cables	a) Periodically inspect and dewater manholes containing safety-related medium-voltage cables.	Commitment is same as in WCNOC letter ET 08-0049.	No review required.
	WCNOC letter ET 08-0049 dated 10/30/2008 (ADAMS Accession No. ML083120428)		b) Evaluate this experience to adjust the inspection/dewatering frequency or implement modifications to prevent long-term submergence of these cables.	Commitment is same as in WCNOC letter ET 08-0049.	No review required.
12	WCNOC letter ET 09-007, dated 3/4/2009 (ADAMS Accession No. ML090771269)	Deviation from Fire Protection Program Requirements	Compensatory fire watches will be maintained in Fire Area A-27, and will remain in place until Change Package 012418 is field implemented.	The database indicates the item is still open but with a required closing date of 3/4/2010. The licensee is waiting for the approval of the amendment request to implement the plant modification. The database was revised to change the required closing date to 10/31/2010.	Open (tracked under CN 2009-341). The database did not reflect accurate status and was revised on 8/19/2010 to provide most recent status.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
13	WCNOC letter ET 09-0016, dated 6/2/2009 (ADAMS Accession No. ML091590170)	Revision to Technical Specifications 5.5.9, "Steam Generator (SG) Program," and TS 5.6.10, "Steam Generator Tube Inspection Report," for a Permanent Alternate Repair Criterion	a) Once approved, the amendment will be implemented prior to MODE 4 entry during startup from Refueling Outage 17. Final TS Bases changes will be implemented pursuant to TS 5.5.14, "Technical Specification (TS) Bases Control Program," at the time the amendment is implemented.	Original CN 2009-347 superseded by CN 2009-353 and CN 2009-359. Incorporated by Amendment 186 on 10/28/2009.	Closed.
			b) In response to a NRC staff request, WCNOC commits to monitor for tube slippage as part of the SG tube inspection program prior to MODE 4 entry during startup from Refueling Outage 17.	Original CN 2009-348 superseded by CN 2009-354. Procedure 1-ENG-023 has been revised.	Closed.
			c) In addition the NRC staff has requested that licensees determine if there are any significant deviations in the location of the bottom of the expansion transition (BET) relative to the top of tube-sheet that would invalidate assumptions in Reference 4 [of the letter]. Therefore, WCNOC commits to perform a one-time verification of tube expansion locations to determine if any significant deviations exist from the top of tube-sheet to the BET. If any significant deviations are found, the condition will be entered into the plants corrective action program. This action will be completed prior to MODE 4 entry during startup from Refueling Outage 17.	Original CN 2009-349 superseded by CN 2009-360; CN 2009-360 closed by CR 20784 on 10/18/2009.	Closed.
14	NRC letter dated 8/7/2009 (ADAMS Accession No. ML091730191) WCNOC letter WO 09-0005 dated 3/6/2009 (ADAMS Accession No. ML090700119)	Adoption of TSTF-511, "Eliminate Working Hour Restrictions from TS 5.2.2 to Support Compliance with 10 CFR Part 26."	Removal of the plant-specific TS requirements will be performed concurrently with the implementation of 10 CFR 26, Subpart I requirements by October 1, 2009.	Amendment No. 185 has been implemented.	Closed.
15	WCNOC letter ET 09-0020 dated 8/17/2009 (ADAMS Accession No. ML092370297)	Response to GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems."	WCNOC will monitor the industry sponsored development of gas accumulation training program and will incorporate appropriate training from the program into the associated Institute of Nuclear Power Operations (INPO) accredited training programs within 120 days following issuance of the industry training program.	Procedure changes made as follows: Operations, 8/5/2010; Engineering, 7/27/2010; and Maintenance, due by 10/1/2010.	Open. Training procedure changes for Maintenance due by 10/1/2010.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
16	WCNOC letter WO 09-0022 dated 9/3/2009 (ADAMS ML092530248)	Request for Approval of Changes to the Technical Specification 3.8.1, "AC Sources - Operating" Bases	Consistent with the requirements in 10 CFR 50.71(e), implementation shall include revision to the Updated Safety Analysis Report (USAR) to include the effects of changes made in the facility or procedures described in the USAR and safety analyses and evaluations performed in support of the license amendment on a frequency consistent with 10 CFR 50.71(e).	The database indicates that the amendment request still is under NRC staff review. However, the application was not accepted by NRC and a new application was submitted by letter WO 09-0039 dated 11/20/2009 (ADAMS Accession No. ML093310430).	Open (tracked under CN 2010-406). The database has not been updated to reflect the actual status of the commitment.
17	WCNOC letter ET 09-0025 dated 9/15/2009 (ADAMS Accession No. ML092730340)	Revision to TS 5.5.9, "Steam Generator (SG) Program," and TS 5.6.10, "Steam Generator Tube Inspection Report."	a) In addition the NRC staff has requested that licensees determine if there are any significant deviations in the location of the bottom of the expansion transition (BET) relative to the top of tube-sheet that would invalidate assumptions in Reference 4. Therefore, WCNOC commits to perform a one-time verification of tube expansion locations to determine if any significant deviations exist from the top of tube-sheet to the BET. If any deviations are found, the condition will be entered into the plants corrective action program. Additionally, WCNOC commits to notify the NRC of any significant deviations. All these actions will be completed prior to MODE 4 entry during startup from Refueling Outage 17.	Verifications performed under CN 2009-360 (CR20784)	Closed.
			b) WCNOC commits to monitor for tube slippage as part of the SG tube inspection program. Slippage monitoring will occur for each inspection of the WCGS SGs. To be performed during each inspection of the SGs.	Per CN 2009-361, was to be completed by RF17; rescheduled for RF18.	Closed.
			c) For the condition monitoring (CM) assessment, the component of operational leakage from the prior cycle from below the H* distance will be multiplied by a factor of 2.50 and added to the total accident leakage from any other source and compared to the allowable accident induced leakage limit. For the operational assessment (OA), the difference in the leakage between the allowable accident induced leakage and the accident induced leakage from sources other than the tube-sheet expansion region will be divided by 2.50 and compared to the observed operational leakage. An administrative limit will be established to not exceed the calculated value. To be performed during each inspection required by TS 5.5.9.	Per CN 2009-362, was to be completed by RF17; rescheduled for RF18.	Closed.
			d) Once approved, the amendment will be implemented prior to MODE 4 entry during startup from Refueling Outage 17. Final TS Bases changes will be implemented pursuant to TS 5.5.14, "Technical Specification (TS) Bases Control Program," at the time the amendment is implemented.	Amendment 186 incorporated the change on 10/28/2009.	Closed.

Item No.	WCNOC/NRC Letter No.	Subject	Description of Commitment	Comments	Status
18	NRC letter dated 10/19/2009 (ADAMS Accession No. ML092750606)	Revision to TS 5.5.9, "Steam Generator (SG) Program," and TS 5.6.10, "Steam Generator Tube Inspection Report."	Regulatory Commitments are the same as listed previously in WCNOC letter ET 09-0025.	See ET 09-0025.	Refer to ET 09-0025.
19	WCNOC letter WO 07-0002 dated 2/23/2007 (ADAMS Accession No. ML070600147)	Response Providing Information Regarding Implementation Details for the Phase 2 and 3 Mitigation Strategies	a) WCNOC will include the SFP internal and external makeup strategies and SFP external spray strategy as described in the general description in attachment 2 in plant guidelines (Tables A.2-1 - A.2-6) by 11/2/2007.	Procedure EDMG-T01 was issued to address CN 2007-244.	Closed. The database does not provide a closure date.
			b) WCNOC will include the command and control enhancement strategies as described in the general description in Attachment 2 in plant guidelines (Tables A.3-1) by 11/2/2007.	Procedure EDMG-001 was issued to address CN 2007-245.	Closed.
			c) WCNOC will fully implement the Pressurized Water Reactor (PWR) mitigation strategies as described in the general description in Attachment 2 in plant guidelines (PWR - Tables A.4-1 - A.4-7) by 11/2/2007.	Procedure EDMG-T01 was issued to address CN 2007-246.	Closed.
			d) WCNOC will list the viable site specific reactor/ containment strategies described in Attachment 2 (except item 47) that could be used by emergency response organization or plant personnel in appropriate guideline (Table A.6-1) by 11/2/2007.	This commitment was revised by the licensee by WCNOC letter WO 07-0030 dated 11/16/2007 to take exception to item 47. However, Procedure EDMG-T01 does not recognize the exception taken by letter WO 07-0030 and needs revision.	Closed. However, procedure EDMG-T01 needs to be revised to remove the error.
			e) WCNOC will conduct training on the mitigation strategy guidelines. Training on the guidelines will be commensurate with the level of training provided for Severe Accident Management Guidelines (SAMGs) by 11/2/2007.	The licensee staff was trained, by Team/Facility Table Top Procedure 2009 Series 2 Tabletop, GE1135662, Revision 003.	Closed.

M. Sunseri

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If there are any questions, I can be contacted at (301) 415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-482

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