



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

December 21, 2010

Mr. Adam C. Heflin
Senior Vice President and Chief Nuclear Officer
Union Electric Company
P. O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 – AUDIT OF THE LICENSEE'S MANAGEMENT OF
REGULATORY COMMITMENTS (TAC NO. ME4840)

Dear Mr. Heflin:

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.

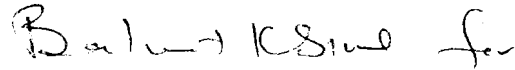
An audit of the Callaway Plant, Unit 1, commitment management program was performed at the plant site during the period October 13-15, 2010. Based on the audit, the NRC staff concludes that Union Electric Company (the licensee) has implemented NRC commitments on a timely basis, with minor deficiencies noted and one commitment not implemented, and has implemented its program for managing NRC commitment changes with programmatic deficiencies noted. The details of the results of the audit are set forth in the enclosed audit report.

A. Heflin

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If you have any questions, please contact me at 301-415-1476 or via e-mail at mohan.thadani@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mohan C. Thadani" with a stylized flourish at the end.

Mohan C. Thadani, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
Audit Report

cc w/encl: Distribution via Listserv



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

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

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 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 that the regulatory commitments are being effectively implemented.

NEI-99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Callaway Plant, Unit 1, commitment management program was performed at the plant site during the period October 13-15, 2010, and discussed during a teleconference on December 16, 2010, with members of your staff. The audit reviewed commitments made by Union Electric Company (the licensee) since the previous audit on August 22-23, 2007, which

Enclosure

was documented in an audit report dated October 31, 2007 (ADAMS Accession No. ML072780002). The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, relief requests, exemptions, etc.) or 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 for verification.

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

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, 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.

2.1.2 Audit Results

The attached Audit Summary (Attachment 1) provides details of the audit and its results.

For reference, the licensee's commitments are tracked in the Commitment Tracking System (CTS) computer database and are managed in accordance with Callaway Plant procedure APA-ZZ-00540, "Commitment Management Program," Revision 013. For this audit, the NRC staff reviewed the selected sample of open and closed regulatory commitments to confirm that the licensee had implemented closed commitments appropriately, and that commitments still open had been captured in an effective program for future implementation as required by the Callaway Plant. The NRC staff reviewed relevant reports and summary sheets from the

computer database and other sources (e.g., corrective action documentation, plant procedures, job numbers, night orders, documented training, etc.) providing the status of each commitment, form of implementation, and any pending further action. In addition, the NRC staff reviewed the licensee's "Commitment Tracking" self-assessment (SA09-RA-S02) dated July 9, 2009.

Based on the review of reports provided by the licensee as described above and on queries of the CTS database during the audit, the NRC staff found that the licensee has generally implemented commitments on a timely basis, but with the following specific implementation and programmatic deficiencies (as documented in Attachment 1):

- (1) For Commitment 50123 for the one-time completion time extension for the Essential Service Water (ESW) system, formal training was not required nor tracked for non-licensed work control personnel authorized to control or release work. This lack of formalized training potentially contributed to four documented challenges in restricting work on the protected and/or opposite train of plant equipment (documented in the corrective action program and resident inspector integrated inspection report).
- (2) For Commitment 50123 mentioned above, licensed operator training was performed without required training specifics as documented in a commitment for this license amendment. This commitment is documented here as not implemented.
- (3) During the NRC staff review of the CTS database and other commitment documentation (most notably the corrective action program), commitments are generally not tracked for the discrete "explicit statement to take a specific action" level as described both in the licensee's procedure and the NEI 99-04 guidance. Commitments are generally tracked holistically at the macro-topic level (at the licensing action level). The most notable example of this was for Commitment 50123, which comprised at least 26 discrete and distinct actions noted as regulatory commitments. Only one commitment tracking number was assigned for these 26 actions, and both the NRC and licensee staff had difficulty in reviewing many disparate databases (corrective action, training, procedures, job control, etc.) to aggregate the needed information to verify commitment implementation. This comment is also noteworthy in that it is a repeat comment from last Commitment Audit report for Callaway Plant dated October 31, 2007, with no response from the licensee in the corrective action program.

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 Callaway Plant is contained in APA-ZZ-00540, "Commitment Management Program," Revision 013 with accompanying change forms CA1571, "Commitment Revision, Initiation, Deletion, Request (CRIDR)," and CA2358, "Commitment Evaluation Summary." The auditors reviewed a sample of commitment changes

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

2.2.1 Audit Results

The attached Audit Summary (Attachment 2) provides details of this portion of the audit and its results.

The NRC staff reviewed procedure APA-ZZ-00540 and its required forms to determine whether the licensee had an effective program in place to identify, manage, and close commitments made to the NRC as part of licensing actions/activities. In addition, the NRC staff reviewed relevant reports and summary sheets from the computer database and other sources providing the status of each commitment, tracking and change forms, and other associated documentation.

The NRC staff compared the guidance in the Callaway Plant procedure APA-ZZ-00540 to the guidance in NEI 99-04. As a result of this comparison, the NRC staff found that the Callaway Plant procedure was consistent with the NEI guidance for identifying, managing, and closing commitments. The NRC staff also found that roles and responsibilities, processes, and metrics were clearly identified in the Callaway Plant procedure.

Based on the review of the reports provided by the licensee as described above, queries of the CTS database, and the accompanying change review and tracking forms provided during the audit, the NRC staff found that the licensee's implementation of its program for managing NRC commitment changes in accordance with its site procedure has programmatic deficiencies noted below and as documented in Attachment 2:

- (1) The NRC staff reviewed 10 licensing actions documented in 29 separate correspondences to the NRC with multiple commitments contained within each licensing action. Of those 10 licensing actions reviewed, seven had missing or incorrect commitment change forms correlating to 13 of the 29 NRC correspondences not being documented properly per the licensee's commitment management program. Due to the number of discrepancies noted and the spectrum of commitments impacted, the NRC staff views this as a commitment management program programmatic deficiency.
- (2) This above comment is also noteworthy in that it is a repeat comment from last Commitment Audit report for Callaway Plant dated October 31, 2007, with no response from the licensee in the corrective action program of the programmatic level concern.

3.0 CONCLUSION

The NRC staff concludes, based on the audit, that (1) Callaway Plant (the licensee) has generally implemented NRC commitments on a timely basis with minor deficiencies noted and one commitment not implemented, and (2) Callaway Plant has implemented its program for managing NRC commitment changes with programmatic deficiencies noted.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Emily M. Fast
Bert G. Yates
Thomas B. Elwood
Jeff D. Lancaster

Principal Contributors: James T. Polickoski
Mohan C. Thadani

Date: December 21, 2010

Attachments:
As stated

ATTACHMENT 1

IMPLEMENTATION OF COMMITMENTS

SUMMARY OF AUDIT RESULTS

OCTOBER 13-15, 2010

CALLAWAY PLANT, UNIT 1

IMPLEMENTATION OF COMMITMENTS

SUMMARY OF AUDIT RESULTS

OCTOBER 13-15, 2010

CALLAWAY PLANT, UNIT 1

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
LAR	ULNRC-05445 ULNRC-05476 ULNRC-05482 ULNRC-05500 ULNRC-05520 ULNRC-05563	10/31/2007 2/21/2008 3/7/2008 5/6/2008 7/10/2008 12/1/2008	One-time completion time extension for essential service water (ESW) system.	50123	Completion time (CT) extension included the due date, requirements by PRAER 07-307 Rev. 1 for OL1282/Amendment 186 to address Tier 2 probabilistic risk assessment (PRA) commitments to get one-time 14-day ESW outage to implement MP 07-0066 and training on technical specification (TS) changes and implementation. The due date was extended by Amendment 191. The commitment was closed at time of implementation.	PRAER 07-307 Rev. 1 OL1282/ Amendment 186 MP 07-0066 Amendment 191	
				50123-1	TS changes implemented by 12/3/2008 and 4/16/2009.		CLOSED - Commitment closed by implementation of Amendment 186 on 11/10/2008 and Amendment 191 on 2/26/2009.
				50123-2-1	No PRA-modeled equipment, other than out-of-service ESW train and supported systems rendered inoperable by that ESW train being out-of-service, will be voluntarily taken out of service during the one-time extended CT taken on each train.		CLOSED - Commitment closed via CAR 200710836 Actions 2.0 and 2.2 closed 12/1/2008; closed via two Night Orders issued 11/28/2008. DISCREPANCIES NOTED - Although specific, signature training was provided to licensed operators via Night Orders, work control personnel (who are not all licensed operators) did not prescriptively receive this same training formally with a required signature. Minor findings documented in CAR 200602643 revealed vulnerabilities during the ESW modification in work control/management.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50123-2-2	No work will be allowed in the area of equipment in the protected engineered safety feature (ESF) train (within 20 feet unless there is an intervening barrier).		<p>CLOSED - Commitment closed via CAR 200710836 Actions 2.0 and 2.2 closed 12/1/2008; closed via two Night Orders issued 11/28/2008; Job Number 08006658.300 issued 11/30/2008.</p> <p>DISCREPANCIES NOTED - Although specific, signature training was provided to licensed operators via Night Orders, work control personnel (who are not all licensed operators) did not prescriptively receive this same training formally with a required signature. This contributed to non-cited violation (NCV) 05000483/2009003-02, "Inadequate Controls of Crane Work Above the Protected Train of Essential Service Water" as noted by the site resident inspectors during the conduct of the ESW modification. Also, minor findings documented in CAR 200902661 revealed additional vulnerabilities during the ESW modification in work control/management.</p>
				50123-3	None of the PRA-modeled equipment in either train will be voluntarily taken out of service during the time that normal service water is available to supply the out-of-service ESW train loads.		<p>CLOSED - Commitment closed via CAR 200710836 Actions 2.2 and 3.6 closed 12/1/2008 and 11/12/2008; closed via two Night Orders issued 11/28/2008.</p> <p>DISCREPANCIES NOTED - Although specific, signature training was provided to licensed operators via Night Orders, work control personnel (who are not all licensed operators) did not prescriptively receive this same training formally with a required signature. Minor findings documented in CAR 200602643 revealed vulnerabilities during the ESW modification in work control/management.</p>

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50123-4-1	Access to the switchyard will be limited to personnel with a demonstratable need (operator rounds involving no equipment manipulation and staff associated with performing 8-hour readiness checks on the temporary diesel generators (DGs)).		CLOSED - Commitment closed via Job Number 08006658.300/510 issued 11/30/2008.
				50123-4-2	No pre-planned work or testing or preventive maintenance will be allowed in the switchyard, or other areas of the plant, that could cause a loss of offsite power (LOOP) event during the 14-day extended CT).		CLOSED - Commitment closed via CAR 200710836 Action 3.6 closed 11/12/2008.
				50123-5	The one-time 14-day extended CT will not be entered if, prior to entry, inclement weather conditions are forecasted (i.e., work under the extended CT will not be started if Severe Weather as defined in OTO-ZZ-00012 is forecasted to occur within 140 miles of the plant). National Weather Service reports will be monitored prior to and throughout each ESW train limiting condition for operation (LCO) outage.		CLOSED - Commitment closed via Job Number 08006658.200 issued 11/1/2008; closed via CAR 200710836 closed 11/12/2008.
				50123-6-1	The turbine-driven auxiliary feedwater pump (TDAFP) will remain operable.		CLOSED - Commitment closed via CAR 200710836 Action 3.7 closed 11/12/2008; closed via Job Number 08006658.300/310 issued 11/30/2008 and 12/1/2008.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50123-6-2	The TDAFP pump room and associated valve rooms will be posted as restricted access.		CLOSED - Commitment closed via CAR 200710836 Action 3.7 closed 11/12/2008; closed via Job Number 08006658.300/310 issued 11/30/2008 and 12/1/2008. DISCREPANCY NOTED - Minor findings documented in CAR 200902612 revealed vulnerabilities during the ESW modification in operations management of TDAFP pump room access.
				50123-6-3	The protected train motor-driven auxiliary feedwater pump (MDAFP) pump room and associated valve rooms will be posted as restricted access.		CLOSED - Commitment closed via CAR 200710836 Action 3.7 closed 11/12/2008; closed via Job Number 08006658.300/310 issued 11/30/2008 and 12/1/2008.
				50123-6-4	The condensate storage tank (CST) will be posted as restricted access.		CLOSED - Commitment closed via CAR 200710836 Action 3.7 closed 11/12/2008; closed via Job Number 08006658.300/310 issued 11/30/2008 and 12/1/2008.
				50123-6-5	No work will be allowed on the Security Diesel.		CLOSED - Commitment closed via CAR 200710836 Action 3.7 closed 11/12/2008; closed via Job Number 08006658.300/310 issued 11/30/2008 and 12/1/2008.
				50123-7-1	During the portion of the extended CT that normal service water is supplying the ESW loads, the normal service water to ESW supply and return cross-connect valves will be opened and power removed from the operators.		CLOSED - Commitment closed via Job Number 08006658.600 issued 12/3/2008.
				50123-7-2	The ESW return to ultimate heat sink valves will be closed and power removed from the operators during this portion of the extended 14-day CT as well.		CLOSED - Commitment closed via Job Number 08006658.610 issued 12/9/2008.
				50123-8-1	Operations Department will verify the availability of fire protection equipment.		CLOSED - Commitment closed via Job Number 08006658.150 issued 11/30/2008.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50123-8-2	Operations Department will verify the availability of flood mitigation (drains, watertight doors) equipment.		CLOSED - Commitment closed via Job Number 08006658.130/140 issued 11/30/2008 and 12/1/2008.
				50123-8-3	Prior to entering the extended ESW CTs, a walkdown of the above ground portion of the protected ESW train will be performed for transient combustibles.		CLOSED - Commitment closed via Job Number 08006658.110/120 issued 11/30/2008.
				50123-8-4	This walkdown will also address the seismic interaction commitments.		CLOSED - Commitment closed via Job Number 08006658.100 issued 12/1/2008.
				50123-9-1	Continuous 1-hour and 8-hour fire and flood watches will be instituted on the protected ESW train ...		CLOSED - Commitment closed via Job Number 08006658.400/410 issued 12/11/2008.
				50123-9-2	The normal charging pump (NCP) will remain functional and its room will be posted as restricted access.		CLOSED - Commitment closed via Job Number 08006658.300 issued 11/30/2008.
				50123-9-3	If the NCP were to become non-functional during the 14-day LCO outage such that the pump becomes unable to provide the required reactor coolant pump seal cooling, administrative controls will require plant shutdown to MODE 3 within 6 hours and to MODE 4 within 12 hours.		CLOSED - Commitment closed via Night Order issued 11/28/2008.
				50123-10-1	Appropriate training will be provided to operations personnel on this TS change and the associated ESW modification.		CLOSED - Commitment closed via Licensed Operator Continuing Training (LOCT) Cycles 08-2 and 08-4 closed on 4/11/2008 and 8/8/2008.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50123-10-2	This training will identify dominant internal events, fire and internal flooding core scenarios, associated with the plant configuration during the extended ESW CT, and include a discussion of mitigation strategies for these scenarios.		FAILED TO IMPLEMENT - The LOCT Cycle 08-2 and 08-4 training discussed above and credited for the above commitment did not include the items listed in this commitment, and the licensee cannot find a record that any training included the requirements of this commitment.
				50123-11-1	A temporary alternate power source consisting of DGs, with combined capacity equal to or greater than the capacity of either one of the installed emergency DGs, will be available as a backup power source.		CLOSED - Commitment closed via Job Number 08004308; closed via CAR 200710836 Actions 1.4 and 3.4 closed on 8/26/2008 and 11/12/2008.
				50123-11-2	Prior to entering the extended 14-day CT on each ESW train, these temporary DGs will be load tested to provide a load equal to the continuous rating of the inoperable DG.		CLOSED - Commitment closed via Job Number 08006658.500 issued 12/1/2008; Job Number 08004308.524 issued 12/2/2008; and Night Order issued on 11/28/2008.
				50123-11-3	After entering the extended ESW CT on each train, this source will be verified available every 8 hours and treated as protected equipment.		CLOSED - Commitment closed via Job Number 08006658.510 issued 12/10/2008; closed via Night Order and accompanying training as was issued on 11/28/2008.
RR	ULNRC-05517	7/10/2008	Relief Request for ESW pipe	50126	This commitment is for ESW PE4710 Pipe to support Relief Request I3R-10. The results will be submitted to the NRC prior to submittal of Callaway's fourth 10-year interval inservice inspection (ISI) plan, and will include, if necessary, a fourth 10-year interval alternative request. This will be completed prior to submittal of Callaway's ISI plan for the fourth 10-year interval with a due date of 6/20/2014.	I3R-10	PENDING – the licensee will evaluate future industry investigations to confirm stress and design factors as well as future evolution of the fusion technique for the installed joints. These results will be completed and submitted to the NRC per the commitment described by 6/20/2014.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
GL	ULNRC-05461 ULNRC-05521 ULNRC-05668	12/10/2007 6/24/2008 2/11/2009	Responds to NRC Generic Letter (GL) 2004-02 and associated containment sump evaluations	50109	Updates to actions originally committed to in the 5/30/ 2006 letter to NRC (ULNRC-05295) include a status update and revision of commitment due dates (extensions).	ULNRC-05295	PENDING – actions related to this commitment are ongoing.
GL	ULNRC-05504 ULNRC-05551 ULNRC-05590	4/10/2008 10/13/2008 2/4/2009	GL 2008-01 (Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems) NRC information request	50125 50129	This commitment is to submit the GL 2008-01 requested information to the NRC within 90 days following the end of Refuel 16. Refuel 16 ended 11/7/2009. The requested information was provided to the NRC via ULNRC-05590 on 2/4/2009.	Gas Accumulation Technical Specifications Task Force (TSTF) Traveler/Consolidated Line Item Improvement Process (CLIIP)	PENDING – the first of two commitments is closed and documented in 50125 on 2/5/2009. The second commitment is pending the outcome of the industry/NRC TSTF review.
BL	ULNRC-05253 ULNRC-05424	1/25/2006 7/9/2007	Inspection of Alloy 82/182/600 materials used in the fabrication of pressurizer penetrations and steam space piping connections at pressurized-water reactors (PWRs)	50094	Portions of the commitment are no longer applicable, and the remainder of the commitment was met with ULNRC-05253.	ULNRC-05253	CLOSED – Commitment closed via the following (2/11/2005) : <ul style="list-style-type: none"> • installation of pressurizer nozzle full structural weld overlays • the overlays have been volumetrically examined • inspection reporting to the NRC is met via ULNRC-05253

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
LAR	ULNRC-05206	9/9/2005	Revision to TS 3.7.3, Main Feedwater Isolation Valves (MFIVs)	50124	This commitment is associated with the implementation of LAR OL-1258, revision to TS 3.7.3, Main Feedwater Isolation Valves, and License Amendment 170 to include implementation due date and implementation of associated changes.	OL1258/ Amendment 170	CLOSED – Commitment closed via License Amendment 170 implementation as follows (12/15/2005): <ul style="list-style-type: none"> Amendment implemented no later than Mode 3 (ascending) during startup from the Refuel 15 Outage. Associated final safety analysis report (FSAR) and TS bases revisions were incorporated. Stroke time baseline testing of the MFIV
LAR	ULNRC-05269 ULNRC-05345	5/22/2007	Boron dilution amendment related to TS 3.9.2/3.3.9	50118	OL-1283 and ULNRC-05345, LA to TS 3.9.2, "Unborated Water Source Isolation Valves" and TS 3.3.9, "Boron Dilution Mitigation System (BDMS)." Amendment, associated procedure changes, associated FSAR changes, and associated TS Bases changes will be implemented within 90 days of NRC approval.	OL-1283	CLOSED – Commitment closed via License Amendment 181 implementation as follows (5/22/2007): <ul style="list-style-type: none"> Implemented within 90 days Administrative controls via written procedures were established prior to implementation Associated FSAR and TS bases revisions were incorporated.
LAR	ULNRC-05627	7/10/2009	Moving Hydrogen Recombiner/ Monitor TS to UFSAR	50103	This commitment is to add the TS requirement for Hydrogen Recombiners and monitors to FSAR Chapter 16 upon implementation of the elimination of the TS requirement.	UFSAR Chapter 16	CLOSED – Commitment closed via License Amendment 199 implementation as follows (9/22/2010): <ul style="list-style-type: none"> The licensee verified its hydrogen monitoring system is capable of diagnosing beyond design-basis accidents The licensee will maintain the capability Hydrogen monitor requirements are included in FSAR Chapter 16.

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
Other	ULNRC-05155 ULNRC-05258 ULNRC-05357	5/26/2005 2/24/2006 1/4/2007	B.5.b mitigation strategy implementatio n	50107			DISCREPANCY NOTED – it appears that credit is taken in OTO for completion of Commitment 50107, but 50107 is not mentioned in the references section of the OTO procedure.
				50107-1			CLOSED - Commitment closed via Extensive Damage Mitigation Guidelines (EDMGS), OTO-SK-00003, Revision 003, Section 4a (8/22/07)
				50107-2			CLOSED - Commitment closed via Extensive Damage Mitigation Guidelines (EDMGS), OTO-SK-00003, Revision 003, Attachment C (8/22/2007)
				50107-3			CLOSED - Commitment closed via Extensive Damage Mitigation Guidelines (EDMGS), OTO-SK-00003, Revision 003, Attachment C (8/22/2007)
				50107-4			CLOSED – closed as discussed in ULNRC-05258
				50107-6			CLOSED - Commitment closed via Extensive Damage Mitigation Guidelines (EDMGS), OTO-SK-00003, Revision 003, Attachment D (8/22/2007)
				50119	Five commitments that are security related and withheld from public disclosure in accordance with 10 CFR 2.390.		
				50119-1	Commitment #1		CLOSED - Commitment closed via Emergency Coordinator Supplemental Guide, Revision 008, Attachments JJ-QQ (8/22/2007)

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Description of Commitment	Supporting Documents	Implementation Status
				50119-2	Commitment #2		CLOSED - Commitment closed via Extensive Damage Mitigation Guidelines (EDMGS), OTO-SK-00003, Revision 003, Section 4 (8/22/2007)
				50119-3	Commitment #3		CLOSED - Commitment closed via Emergency Coordinator Supplemental Guide, Revision 008, Attachments B-D, V, X, Y, R, A, CC, DD, HH (8/22/2007)
				50119-4	Commitment #4		CLOSED - Commitment closed via Emergency Coordinator Supplemental Guide, Revision 008, Attachments EE-GG, Z, AA, BB (8/22/2007)
				50119-5	Commitment #5		CLOSED - Commitment closed via CAR 200601311, Actions 11, 11.1, 11.2, 11.3, 11.4, 12, 12.1, 12.2, 12.3, 12.4 (10/5/2007)

ATTACHMENT 2

MANAGEMENT OF CHANGES TO REGULATORY COMMITMENTS

SUMMARY OF AUDIT RESULTS

OCTOBER 13-15, 2010

CALLAWAY PLANT, UNIT 1

MANAGEMENT OF CHANGES TO REGULATORY COMMITMENTS

SUMMARY OF AUDIT RESULTS

OCTOBER 13-15, 2010

CALLAWAY PLANT, UNIT 1

Type	Commitment Source Document	Commitment Date	Commitment Subject	Commitment Number	Original Description of Commitment	Revised Commitment	Supporting Documents	Change Status
LAR	ULNRC-05445 ULNRC-05476 ULNRC-05482 ULNRC-05500 ULNRC-05520 ULNRC-05563	10/31/2007 2/21/2008 3/7/2008 5/6/2008 7/10/2008 12/1/2008	One-time Completion Time (CT) extension for essential service water (ESW) system.	50123	CT extension included the due date, requirements by PRAER 07-307 Rev. 1 for OL1282/Amendment 186 to address Tier 2 probabilistic risk assessment (PRA) commitments to get one-time 14-day ESW outage to implement MP 07-0066 and training on technical specification (TS) changes and implementation. The due date was extended by Amendment 191. The commitment was closed at time of implementation.		PRAER 07-307 Rev. 1 OL1282/Amendment 186 MP 07-0066 Amendment 191	DISCREPANCIES NOTED – As identified by the licensee during its Commitment Tracking Self-Assessment (SA09-RA-S02) dated 7/9/2009 and following commitment initiation with ULNRC-05445, no further revision or deletion forms were submitted for ULNRCs-05476, 05482, 05500, 05520, 05563.
RR	ULNRC-05517	7/10/2008	Relief Request for ESW pipe	50126	This commitment is for ESW PE4710 pipe to support Relief Request I3R-10. The results will be submitted to the NRC prior to submittal of Callaway's fourth 10-year interval inservice inspection (ISI) plan, and will include, if necessary, a fourth 10-year interval alternative request. This will be completed prior to submittal of Callaway's ISI plan for the fourth 10-year interval with a due date of 6/20/2014.	No new commitments made.	I3R-10	Initiation Form completed per procedure (CA1571 form on 08/25/2008).

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GL	ULNRC-05124 ULNRC-05194 ULNRC-05295 ULNRC-05408 ULNRC-05461 ULNRC-05521 ULNRC-05668	3/7/2005 9/1/2005 5/30/2006 5/1/2007 12/10/2007 6/24/2008 11/24/2009	Responds to NRC Generic Letter (GL) 2004-02 and associated containment sump evaluations	50109	Initial commitments were provided in ULNRC-05124 with additional detail and commitments in ULNRC-05194.	Updates to actions originally committed to in the 5/30/2006 letter to NRC (ULNRC-05295) include a status update and revision of commitment due dates (extensions). The following ULNRC's have provided more updates to commitments: 05408, 05461, 05521, 05668.	ULNRC-05295	DISCREPANCY NOTED – An initiation form was not submitted for the initial commitments of ULNRC-05124 nor a revision for the added detail and additional commitments in ULNRC-05194. The balance of revision forms through the current ULNRC-05668 are per procedure.
GL	ULNRC-05504 ULNRC-05551 ULNRC-05590	4/10/2008 10/13/2008 2/4/2009	GL 2008-01 (Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems) NRC information request	50125 50129	This commitment is to submit the GL 2008-01 requested information to the NRC within 60 days following the end of Refuel 16.	Submit the GL 2008-01 requested information to the NRC within 90 days following the end of Refuel 16. Monitor industry resolution and submit LAR within 1 year of NRC approval of Technical Specifications Task Force (TSTF) and Consolidated Line Item Improvement Process (CLIIP).	Gas Accumulation TSTF Traveler/ CLIIP	DISCREPANCY NOTED – Although an initiation form was submitted for ULNRC-05504, a revision form was not submitted for the commitment changes in ULNRC-05551 as required per procedure for 50125 nor was a deletion submitted following completion of the first commitment (noted in self-assessment). Instead, the licensee initiated a new commitment (50129) to document the changed and new commitment in ULNRC-05551. 50129 was revised properly per procedure to update commitment status (although commitment wording remained unchanged).

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BL	ULNRC-05031 ULNRC-05253 ULNRC-05424	7/27/2004 1/25/2006 7/9/2007	Inspection of Alloy 82/182/600 materials used in the fabrication of pressurizer penetrations and steam space piping connections at pressurized-water reactors	50094	<ul style="list-style-type: none"> Perform bare metal visual inspections near the beginning of each outage Submit a report to the NRC indicating the inspections completed and the as-found condition of the pressurizer 	The first commitment is no longer applicable, and the second commitment was met with ULNRC-05253.	ULNRC-05253	DISCREPANCY NOTED – The licensee did not follow procedure by not initiating a commitment per procedure for ULNRC-05031 containing the initial two commitments. Also, no revision or initiation was performed per procedure when ULNRC-05253 was submitted. Finally, the licensee documented a revision after commitment closure on 8/19/2009 when the commitment was closed 2/11/2005.
LAR	ULNRC-05206 ULNRC-05224	9/9/2005 10/24/2005	Revision to TS 3.7.3, Main Feedwater Isolation Valves (MFIVs)	50124	This commitment is associated with the implementation of LAR OL-1258, revision to TS 3.7.3, Main Feedwater Isolation Valves and License Amendment 170 to include implementation due date and implementation of associated changes.	No new commitments made.	OL1258/ Amendment 170	Initiation Form completed per procedure (CA1571 form on 11/29/2007).

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LAR	ULNRC-05269 ULNRC-05345	5/22/2007	Boron dilution amendment related to TS 3.9.2/3.3.9	50118	OL-1283 and ULNRC-05269, LA to TS 3.9.2, "Unborated Water Source Isolation Valves" and TS 3.3.9, "Boron Dilution Mitigation System (BDMS)." Amendment, associated procedure changes, associated final safety analysis report (FSAR) changes, and associated TS Bases changes will be implemented within 90 days of NRC approval.	ULNRC-05345 added a fifth commitment to ensure written procedures will ensure prompt verification that unborated water sources shall be secured in the closed position.	OL-1283	DISCREPANCY NOTED – The licensee did not follow procedure by not initiating a commitment per procedure for ULNRC-05269. The licensee instead initiated the commitment per the final list of commitments in ULNRC-05345 instead of what should have been a revision.
LAR	ULNRC-05627	7/10/2009	Moving Hydrogen Recombiner/ Monitor TS to Updated Final Safety Analysis Report (UFSAR)	50103	Original commitment was a placeholder awaiting submission of an LAR.	Detailed commitment within license amendment request to add the TS requirement for Hydrogen Recombiners and monitors to FSAR Chapter 16 upon implementation of the elimination of the TS requirement.	UFSAR Chapter 16	Commitment revision form submitted per procedure – completed per CA1571 form 3/23/2010.

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Other	ULNRC-05155 ULNRC-05256 ULNRC-05258 ULNRC-05357	5/26/2005 2/14/2006 2/24/2006 1/4/2007	B.5.b mitigation strategy implementation	50107				DISCREPANCY NOTED – the original commitment for 50107 was made via ULNRC-05155 and further clarified with 8 commitments via ULNRC-05258. Although a commitment revision form exists for ULNRC-05258, no commitment initiation form exists for ULNRC-05155. This is against the licensee's commitment management program procedure requiring submittal of internal change forms to drive internal licensee review and/or track status.

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				50119	Five commitments that are security related and withheld from public disclosure in accordance with 10 CFR 2.390			DISCREPANCY NOTED – the original commitment for 50119 was made via ULNRC-05256 and further clarified with 5 commitments via ULNRC-05357. Although a commitment initiation form exists for ULNRC-05357 (which should have been a commitment revision form), no commitment initiation form exists for ULNRC-05256. This is against the licensee's commitment management program procedure requiring submittal of internal change forms to drive internal licensee review and/or track status.

A. Heflin

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If you have any questions, please contact me at 301-415-1476 or via e-mail at mohan.thadani@nrc.gov.

Sincerely,

/RA by Balwant K. Singal for/

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Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

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