

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

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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

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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

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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	LC000141 , LA000133	Note 03-C	LI*	CA069210 says to update procedure GNP- 08.12.02 plus tags.	None	Yes- it was timely since it accomplis hed a design change.	NA	NA

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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</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. Completi n took place within 60 days, as planned.	NA	NA

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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 incorporat ed in reference to this Amd's approval.	NA	NA

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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. During NRC ISFSI Inspection (6/09) issues were identified with crane inspection procedure s concernin g B30.2 guidance. REF CR 337889. Revised MA-KW- MPM-CRN 007 Rev. 2 and TEC MA-KW- MPM-CRN 002 Rev 3. ASME B30.2 is referenced in procedure s.	NA	NA

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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	Yes, implement ed in a timely manner. Amd was issued 11/08 and implement ed 1/09. Much work took place - USAR revision submitted 9/09 with the next scheduled update of USAR being 3/31/10.	NA	NA

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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 tTrack 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
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 - tTrack shows completion date changed to 6/1/11.	NA



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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 26, 7/18/2010	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 Maintenan ce Program RE89105, which notes it is a RgCm.	NA	NA

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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

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12	<p>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)</p> <p>Note 12-2</p>	MD9221	Amend. No, 205, 4/30/09, ML090570710	<p>1. DEK will submit the results of the analyses performed using the nonlinear seismic analysis methodology described in this LAR.</p> <p>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.</p> <p>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.</p> <p>[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]</p>	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 accomplish ed 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

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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 edit	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

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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, B.2.1.31-1, 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

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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 [Observati on 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 successfu l)
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

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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

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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



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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>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#	"MLnnnnnnnnn" (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