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

September 23, 2011

Mr. Rafael Flores
Senior Vice President and
Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – AUDIT OF THE LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS. ME5298 AND ME5299)

Dear Mr. Flores:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC 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 Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2, commitment management program was performed at the plant site on August 16-17, 2011. The NRC staff concludes, based on the audit, that Luminant Generation Company LLC (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 CPNPP, Units 1 and 2. The details of the audit including the NRC staff's observations and recommendations are set forth in the enclosed audit report.

The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. 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 Nos. 50-445 and 50-446

Enclosure:
Audit Report

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

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments and encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC 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 licensing activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2 commitment management program was performed at the plant site on August 16-17, 2011. The audit reviewed commitments made since the previous audit on June 9, 2008 (audit report issued on July 31, 2008 (ADAMS) Accession No. ML081970666). 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, exemptions, relief requests, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff searched ADAMS for the licensee's submittals since the last audit and selected a representative sample of regulatory commitments for verification. The identified list of commitments was forwarded to the licensee with a request to locate documentation for the listed regulatory commitments ahead of the NRC staff visit.

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

Luminant Generation Company LLC (Luminant, the licensee) has implemented Procedure STA-509, "Commitments Management Program," which identifies the methods and site organization tools for managing development, review, and implementation of station commitments. The licensee's Procedure REG-509, "Nuclear Licensing Commitment Administration," establishes the processes, guidelines, and activities the licensee uses to manage the development, review, and implementation of commitments generated from regulatory obligations and self-imposed requirements. An electronic commitment tracking

system (ECTS) database is used in conjunction with other information sources to address and track regulatory commitments.

The documents furnished by the licensee during the audit included summary sheets from the ECTS database providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The NRC staff reviewed the documents and summarized the selected commitments information 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 regulatory 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.

As discussed above, the ECTS and commitments material change evaluation (CMCE) provided by the licensee's Procedures STA-509 and REG-509, provide acceptable tools for the licensee to capture the NRC guidance on commitment management programs. The licensee enters the regulatory commitments made to the NRC into a database. The regulatory commitments are labeled as regulatory commitments. Each commitment is numbered and described by a commitment title and brief description. Status of the commitments, implementation dates, target implementation (documents which finally capture the commitment) document information associated with each specific commitment, and comments are captured in the database. The licensee's staff is well trained in updating the commitment management program.

The NRC staff's audit of the licensee's commitment management program for CPNPP, Units 1 and 2, did not identify any regulatory commitments that were not satisfied or incorporated. The licensee has maintained the ECTS database very well and all the commitments selected for this audit were easily traceable in the database. In case the commitment was already incorporated, the database provided an accurate status of the commitment providing reference to the implementation document.

The review did not identify any errors in the ECTS database. A discrepancy in implementing Commitment No. 3618664, as described below, was identified. However, this was only a procedural discrepancy and did not have any safety significance. The licensee was in the process of writing a condition report to remove the discrepancy.

> Commitment No.: 3618664
>
> STA-202, Revision 35 "Station Administration Manual – Nuclear Generation Procedure Change Process," Step 2.8.2, requires that for those cases where the entire procedure satisfies the commitment, the [C] designating the entire procedure to satisfy the commitments, should be placed in the left margin for the PURPOSE section (Section 1.0) and the commitment number identified in the REFERENCES section OR the commitment(s) may be identified by commitment number within a step in the procedure. Procedure STA-698 was developed to satisfy Commitment No. 3618664. The procedure did not label Section 1.0, "PURPOSE" with [C], as required by Procedure STA-202. However, the Commitment No. was added to the Reference section and the sections of the

procedure containing the commitment were labeled with [C] (not the commitment number.

To ensure that the regulatory commitments are not removed/changed in future revisions to the target documents, a database search is performed to identify all the open and closed commitments against the document/procedure being revised and it is ensured that all the closed commitments are captured. In addition, the plant procedures require that all the specific regulatory commitments pertaining to the individual document be included in the reference section. This ensures that the commitments are neither removed nor changed without management approval in accordance with the plant procedures.

As a result of the audit in 2008, the NRC staff identified one area with potential for improvement. The NRC staff recommended that the area of change in the target document should be marked consistently with the regulatory commitment number to ensure that the commitment is easily traceable and eliminates any potential for it to be changed or deleted. The licensee revised its Procedure STA-202 to incorporate this recommendation. The procedure (step 2.8.2) was revised to state:

> [C] denotes the incorporation of a CPNPP commitment (See STA-509). Procedural steps required to be performed due to a station commitment, identified in the commitment tracking system (e.g. SOERs [Significant Operating Experience Reports], NRC items, etc.), should be specified in the left margin by using a [C] except for those cases where the entire procedure, not a section or step, satisfies the commitment or where the unique formatting method of the procedure does not allow entering a [C] in the left margin or where commitment number is clearly identified.
>
> For those cases where the entire procedure satisfies the commitment, typically identified in the commitment as ALL, the [C] should be placed in the left margin for the PURPOSE section (Section 1.0) and the commitment number identified in the REFERENCES section OR the commitment(s) may be identified by commitment number within a step in the procedure.

Even if the licensee chose not to include the specific commitment number in the area of change in the target document, the commitment number is included in the reference section of the procedure in addition to a permanent marking [C] in the area of change to reflect the area containing the commitment. It ensures that all the regulatory commitments are identified in the target document and can be tracked easily. The NRC staff views this as an improvement of the commitment management program

Based on the results of the on-site audit, the NRC staff believes that the licensee has implemented the regulatory commitment management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04.

The attachment to this audit report contains details of the audit and a summary of the audit results.

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 CPNPP, Units 1 and 2, is contained in Procedures STA-509 and REG-509. 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.

2.2.1 Audit Results

Detailed processes are outlined by which the licensee carries out obligations under its regulatory commitments. Any changes to the commitments are processed through the CMCE process. Changes to obligatory commitments are reported to the NRC in accordance with the recommendations of LIC-105. CMCE identifies the affected commitments, their origin, original criteria, proposed changes, and justification for change. The commitment changes are documented in CMCE forms for submittal to the NRC staff.

The licensee performed an ECTS database search and provided a list of commitment changes made since the last audit. The list contained a total of 79 items, identified as commitment changes. The initial NRC staff review indicated that, with the exception of six items, the remaining of the items were the licensee's internal commitments; therefore, the review was limited to the items related to regulatory commitments only. Further, the review indicated that the licensee search tracked corrections to the ECTS database, not resulting from an actual commitment change, also as commitment changes. The rest of the items fell in this category. Hence, it was concluded that there were no regulatory commitment changes made by the licensee for this audit period. The completion date for Commitment No. 3641550 was revised. However, the completion date for this commitment was tied to issuance of the safety evaluation (SE) for WCAP-16793 by NRC staff (90 days after issuance of the SE). The NRC staff had not issued the SE for WCAP-16793 as of the date of this letter. Hence, the change did not require CMCE.

Based on the results of the on-site audit, the NRC staff believes that the licensee has implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04.

3.0 OBSERVATIONS AND RECOMMENDATIONS

The ECTS database does not have a field to include the closing date for commitments. Presently, the licensee is using the field for "Last Update Date" as the date for commitment closure. However, it could potentially be misleading if the ECTS database is revised for any

other corrections after closing the commitment. The NRC recommended that the ECTS database should include an additional field to clearly state the commitment closing date. The licensee plans to incorporate the recommendation as an enhancement to its commitment management program.

4.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the regulatory commitment management program effectively, and implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04. The specific observations and recommendations identified during the audit are detailed in Section 3.0 of the report.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Tamera Ervin-Walker and Steve Dixon.

Principal Contributor: Balwant K. Singal

Date: September 23, 2011

Attachment:
Regulatory Commitments and
Summary of Audit Results

REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS
COMANCHE PEAK NUCLEAR POWER PLANT
AUDIT PERFORMED FROM AUGUST 16-17, 2011

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-09118, dated September 21, 2009 (ADAMS Accession No. ML092650236)	Supplemental Response to NRC Generic Letter (GL) 2008-01	3618664	As a result of the GL 2008-01 evaluation, a new Gas Intrusion Program is required to be developed. The program will include as a minimum: • Ultrasonic Testing (UT) of selected system and local high points after unit refueling outages to confirm that the systems are full of water. • Condition based evaluation process that is initiated upon the occurrence of any event identified as a potential source for gas intrusion, including UT examinations and continued frequency requirements. • Engineering evaluation of work orders identified to contain a breach of an emergency core cooling system (ECCS), residual heat removal (RHR) or containment spray system CSS), or CSS piping system. • Addition of a Design Impact in the design control program for any piping configuration change to ECCS, RHR, or CSS system. • Providing additional training for Operations, Maintenance, and Engineering on gas intrusion potential. The program will be developed by October 11, 2009. Commitment was made under letter TXX-08120. This letter changed the commitment date to March 31, 2010.	Closed. The Procedure STA-698, "Gas Intrusion Program," was developed and the commitment was closed on March 31, 2010. Screening criteria for the Final Design Authorization process was revised to address the impact changes in piping configurations. Verified training modules for Maintenance, Engineering, and Operations. Also, verified the training records for completion of the training to all the three organizations. For additional comments on procedural discrepancy, please refer to the Note on page 9 of this Attachment.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-08095, dated August 28, 2008 (ADAMS Accession No. ML082520253)	Supplement to Response to GL 2004-02	27330	In response to the request for information in Part 1 of GL 2004-02, Comanche Peak Nuclear Power Plant (CPNPP) has substantially completed an analysis of the susceptibility of the ECCS and CSS recirculation functions for CPNPP, Units 1 and 2. The methodology used will conform to the intent of Nuclear Energy Institute (NEI) 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology." The analyses, when fully completed, will provide the basis to show compliance with the applicable regulatory requirements including Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.46 and 10 CFR 50, Appendix A, General Design Criteria 35 and 38. The final analysis is scheduled to be completed by August 31, 2008.	Closed. This commitment was incorporated before issuance of this letter and Engineering Report ER-ESP-001 has been updated. Engineering Report transmitted to NRC via letter TXX-08141, dated November 26, 2008 (ADAMS Accession No. ML083500465).
		27369	The ECCS and CSS recirculation functions under debris loading conditions at CPNPP, Units 1 and 2, will be in compliance with the regulatory requirements listed in the Applicable Regulatory Requirements section of GL 2004-02 by August 31, 2008.	Closed. This commitment was incorporated before issuance of this letter and Engineering Report ER-ESP-001 has been updated. Engineering Report transmitted to NRC via letter TXX-08141, dated November 26, 2008 (ADAMS Accession No. ML083500465).
		3582478	Luminant Power will update engineering report ER-ESP-001, "Generic Letter 2004-02 Supplemental Response (Luminant Power's Update to the modifications and Maintenance actions for Resolution of GL 2004-02)" provided in reference 6 [Letter TXX-07164, dated December 3, 2007) by November 26, 2008.	Closed. Updated report transmitted to NRC via letter TXX-08141, dated November 26, 2008 (ADAMS Accession No. ML083500465).

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-08141, dated November 26, 2008 (ADAMS Accession No. ML083500465)	Supplement to Response to GL 2004-02	3641550	The CPNPP analysis and licensing basis are in accordance with WCAP-16793. When the NRC final Safety Evaluation (SE) on WCAP-16793 is issued, it will be reviewed for impact and the evaluation of long-term cooling will be revised as appropriate. The supplemental response will be revised and submitted within 90 days after issuance of the final SE.	Open. NRC's SE for WCAP-16793 is still pending. No commitment material change evaluation (CMCE) was needed since the completion of the commitment was tied to issuance of the NRC's SE.
NRC letter dated October 9, 2009 (ADAMS Accession No. ML092740076)	Establish Alternate Repair Criteria and Reporting Requirements for Steam Generator Program	3740011	Luminant Power commits to monitor for tube slippage as part of the steam generator tube inspection program. Slippage monitoring will occur for each inspection of the CPNPP Unit 2 steam generators. This commitment is required to be completed during each Unit 2 steam generator eddy current inspection starting in Refueling Outage 2RF12.	Closed. Procedures NDE 7.13, "Steam Generator Degradation Mechanism Assessment," and NDE 7.10, "Steam Generator Tube Selection and Examination," were revised to incorporate this commitment.
		3740015	Luminant Power commits to perform a one-time verification of tube expansion locations to determine if any significant deviations exist from the top of the tubesheet to the beginning of expansion transition. If any deviations are found, the condition will be entered into the CPNPP corrective action program. Additionally, Luminant Power commits to notify the NRC of any significant deviations. This commitment will be performed prior to start of Refueling Outage 2RF11.	Closed. Luminant performed a one-time verification as committed and concluded that the deviation was not significant and did not require NRC notification. Condition Report CR-2009-005402-00 was reviewed as part of the documentation.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NRC letter dated October 9, 2009 (ADAMS Accession No. ML092740076) (Continued)	Establish Alternate Repair Criteria and Reporting Requirements for Steam Generator Program (Continued)	3779679	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 3.16 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 allowed accident-induced leakage and the accident-induced leakage from sources other than the tubesheet expansion region will be divided by 3.16 and compared to the observed operational leakage. An administrative limit will be established to not exceed the calculated value. This commitment will be implemented prior to entry to Mode 4 from Refueling Outage 2RF11.	Closed. Procedure NDE 7.14, "Steam Generator Tube Integrity Assessment" was revised to incorporate the commitment.
NRC Letter dated October 29, 2010 (ADAMS Accession No. ML102810130)	Extension of the Completion Times for the Offsite Circuits on One-Time Basis	3792121	The temporary power diesel generators (TPDGs) provided for each Unit will be verified available to provide power to equipment for long-term cooling once per shift during the 14-day Completion Time.	Closed. Defense in Depth Contingency Plan (DIDCP) XST2-01 was developed to incorporate this commitment.
		3792145	During the one-time, 14-day Completion Time for XST2, one set of TPDGs will be provided for each Unit.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792165	All four emergency diesel generators (EDGs) and both turbine-driven auxiliary feed water pumps (TDAFWPs) will be verified OPERABLE within the 2-week period prior to the start of the one-time, 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792166	All routine or elective testing and maintenance activities affecting the switchyards and relay houses (with the exception of operator rounds), EDGs, TDAFWPs, station service water (SSW) pumps, XST1 and work activities along the route associated with power and control cabling for XST1 will be suspended for the duration of the one-time, 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NRC Letter dated October 29, 2010 (ADAMS Accession No. ML102810130) (Continued)	Extension of the Completion Times for the Offsite Circuits on One-Time Basis (Continued)	3792168	Roving hourly fire watches along the route associated with power and control cabling for the in-service startup transformer, XST1, will be established for the duration of the one-time, 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792169	Plant modification activities requiring the use of the one-time, 14-day Completion Time will be planned so as to minimize the probability of severe weather or grid stress. Administrative controls in place within 120 days of NRC approval.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792197	Local weather conditions and forecasts will be monitored by Operations twice per shift to assess potential impacts on plant conditions during the 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792171	A walkdown will be completed prior to entering the 14-day Completion Time to identify any issues that could adversely affect the availability of the EDGs or TDAFWPs during a seismic event.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792177	Access to the switchyards, the relay houses, the EDGs, the TDAFWPs, the SSW Pumps and XST1, will be posted and controlled prior to the implementation of the 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.
		3792178	CPNPP's Operations Department will contact the Transmission Operator (Transmission Grid Controller) once per day during the 14-day Completion Time to ensure no problems exist in the transmission lines feeding CPNPP or their associated switchyards that would cause post trip switchyard voltages to exceed TS limits.	Closed. DIDCP XST2-01 was developed to incorporate this commitment.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NRC Letter dated October 29, 2010 (ADAMS Accession No. ML102810130) (Continued)	Extension of the Completion Times for the Offsite Circuits on One-Time Basis (Continued)	3792184	Just-in-time training for affected work groups will be completed prior to the start of the XST2 outage, prior to implementation of the 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment. Also, Procedure LO44.ECA.XG1 for Loss of All AC [alternating current] Power was developed as a result of this commitment. Reviewed the training records for maintenance and operations personnel for completion of the training before implementing the modification.
		3792190	Operating and maintenance procedures will be developed and issued for using XST2A as an alternate startup transformer for XST2, prior to implementation of the 14-day Completion Time.	Closed. DIDCP XST2-01 was developed to incorporate this commitment. Also, Procedures ABN-601 for Response to a 138/345 kilovolt (KV) System Malfunction, SOP-602 for 138 KV and 345 KV Transformers and Switchyard Air Switches, MSE-PX-0764 for XST2 and XST2A Startup Transformer Phase Rotation Check, MSE-G0-6001 for Main Generator, Isophase Bus and Power Transformer Link and Support Activities, and MSE-PX-0765 for Interchanging Startup Transformers XST2 and XST2A were developed to implement the modification and to comply with this commitment.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NRC Letter dated October 29, 2010 (ADAMS Accession No. ML102810130) (Continued)	Extension of the Completion Times for the Offsite Circuits on One-Time Basis (Continued)	3932461	Procedures will be revised to facilitate the TPDGs to power the loads necessary for safe shutdown and long-term cooling of the Unit, that has lost all onsite and offsite power, prior to the one-time, 14-day TS Completion Time for Startup Transformer XST2 by March 1, 2011.	Closed. Procedures ECA-0.0A and ECA-0.0B for Loss of All AC Power, ECA-TP-11-001A and ECP-TP-11-001B for Loss of all AC Power Recovery without SI Required and APG Supplying Power, SOP-614A and SOP-614B for Alternate Power Generator Operation, and ABN-601 for Response to a 138/345 KV Malfunction were generated to implementing the modification and to comply with the commitment.
TXX-08008, dated January 10, 2008 (ADAMS Accession No. ML080160118)	Revise Rated Thermal Power from 3458 MWt to 3612 MWt (Stretch Power Uprate)	3435228	The requested information corresponding to a better estimate type analysis (e.g., with nominal initial conditions, is scheduled to be provided in a separate letter by February 29, 2008).	Closed. By letter TXX-08014, dated February 28, 2008 (ADAMS Accession No. ML080660070), Luminant provided the revised analysis of the loss of external electrical load/turbine trip event.
		3435242	The Unit 2 high-energy line break temperature evaluation is expected to-be completed by April 15, 2008.	Closed. Stone and Webster, Inc. completed the Main Steam and Feedwater Penetration Area Environmental Analysis by letter dated March 31, 2008.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-09046, dated April 1, 2009 (ADAMS Accession No. ML090910744)	Adoption of Technical Specification Task Force (TSTF) Change Traveler TSTF-511, Revision 0	3696981	Removal of the plant-specific TS requirements will be performed concurrently with the implementation of the 10 CFR 26, Subpart I requirements and commitment will be completed no later than October 1, 2009.	Closed. The TS changes were incorporated in TS Amendment No. 148, issued on October 1, 2009.
TXX-09130, dated October 22, 2009 (ADAMS Accession No. ML093020119)	Update of Commitment Regarding Equipment Qualification Bounding Post Loss-of Coolant Accident Profiles	3495809	Environmental Qualification (EQ) packages will subsequently be updated to reflect completed evaluations using the revised pressure and temperature profiles prior to startup from the current refueling outage (Unit 2 only, Unit 1 already completed)	Open. The EQ packages have been updated and are currently being reviewed. There was no specific date for completing the commitment.
TXX-11021, dated February 25, 2011 (ADAMS Accession No. ML110660481)	Order for Implementation of Additional Security Measures	3977962	Achieve full compliance with the provisions of Attachments 1 and 2 of the NRC issued "Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access to Comanche Peak Steam Electric Station Independent Spent Fuel Storage Installation" (EA-2010-051, dated June 9, 2010) by June 21, 2011.	Closed. By letter TXX-11076, dated June 13, 2011 (ADAMS Accession No. ML11173A132), Luminant informed NRC that Luminant is in full compliance with the requirements of Order EA-2010-051.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-10097, dated June 15, 2010 (ADAMS Accession No. ML102030124)	License Amendment Request 10-002, for Approval of the CPNPP Cyber Security Plan	3834209	Implement all cyber-security-related modifications (outage and non-outage) and enter the maintenance phase of the NRC approved Cyber Security Program (CSP). Note: The commitment completion date is as specified in the letter dated June 15, 2010. Luminant also made additional commitments in Enclosure 2, "CPNPP Cyber Security Plan Proposed Implementation Schedule," in its letter dated June 15, 2010, and the completion dates are listed against each commitment. The completion dates for these commitments being security-related information, are not included here.	Open. The NRC staff approved the Cyber Security Plan for CPNPP on July 26, 2011. The NRC staff did not regard the CSP milestone implementation dates as regulatory commitments that can be changed unilaterally by the licensee. The NRC staff indicated that all subsequent changes to the NRC-approved CSP implementation schedule will require prior NRC approval pursuant to 10 CFR 50.90. Hence, these commitments do not need any more tracking. Based on the NRC staff's decision, the licensee is in the process of closing these commitments.

Note (Applicable to Commitment No. 3618664):

STA-202, Step 2.8.2, requires that for those cases where the entire procedure satisfies the commitment, the [C] designating the entire procedure to satisfy the commitments, should be placed in the left margin for the PURPOSE section (Section 1.0) and the commitment number identified in the REFERENCES section OR the commitment(s) may be identified by commitment number within a step in the procedure. Procedure STA-698 was developed to satisfy this commitment (Commitment No. 3618664). The procedure did not label Section 1.0, "PURPOSE" with [C], as required by Procedure STA-202. However, the Commitment No. was added to the Reference section and the sections of the procedure containing the commitment were labeled with [C] (not the commitment number. The licensee was in the process of creating a condition report to remove the discrepancy.

The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. 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 Nos. 50-445 and 50-446

Enclosure:
Audit Report

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