



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001
December 21, 2011

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS. ME7137 AND
ME7138)

Dear Mr. Pacilio:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, the Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. In addition, the NRC 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 three years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

An audit of LaSalle County Station (LSCS), Units 1 and 2, commitment management program was conducted at LSCS during the period November 7 - 8, 2011. The NRC staff concludes, based on the audit that (1) LSCS has implemented NRC commitments on a timely basis, and (2) LSCS has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

M. Pacilio

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If you have any questions, please contact me at (301) 415-3302.

Sincerely,

Araceli T. Billoch Colón

Araceli T. Billoch Colón, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure: Commitment Management Audit Report

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKETS NOS. 50-373 AND 50-374

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 Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes" (ADAMS Accession No. ML003680088), contains acceptable guidance for controlling regulatory commitments. In addition, the NRC 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 three years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that 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 (e.g., amendments, reliefs, exemptions, etc.) and activities (e.g., bulletins, generic letters, etc.). The audit is to be performed every three years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of LaSalle County Station's (LSCS), Units 1 and 2, commitment management program was performed at LSCS during the period of November 7 - 8, 2011. The audit reviewed commitments made since the previous audit on September 17 - 18, 2008. 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.

Enclosure

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 or licensing activities. Commitments made in Licensee Event Reports or in response to Notices of Violation may be included in the sample, but the review will be limited to verification of restoration of compliance, not the specific methods used. The NRC staff searched 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 NRC staff reviewed relevant procedures to determine whether the licensee had an effective program in place to identify, manage, and close commitments made to the NRC. The procedures reviewed were: (1) Exelon Nuclear Procedure LS-AA-110, "Commitment Management," Revision 8, and (2) Exelon Nuclear Procedure LS-AA-110-1001, "Commitment Tracking Program T&RM, for use with PassPort," Revision 6. In addition, the NRC staff reviewed a sample of open and closed 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.

The NRC staff compared the guidance in procedures LS-AA-110 and LS-AA-110-1001 to the guidance in NEI 99-04. As a result of this comparison, the NRC staff found that Exelon Nuclear procedures were 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 Exelon procedures.

The licensee's commitments are tracked in a computer database called PassPort. Based on reports provided by the licensee and on queries of the PassPort database during the audit, the NRC staff found that PassPort is able to provide the necessary information (e.g., summary of the commitment, commitment type, lead department, responsible individual, due date, extensions, closure method and date, and associated historical information) to effectively manage NRC commitments.

For this part of the audit, the NRC staff reviewed LSCS site records associated with commitments involving, generic letters, bulletins, and license amendments to determine whether the licensee had implemented the closed commitments appropriately, and whether the licensee had established a success path for future implementation of the open commitments.

The NRC staff reviewed the documentation associated with the closed regulatory commitments, particularly plant procedures that had been revised as a result of the commitments, and found that the commitments reviewed had been closed in a manner that fully satisfied the commitments made to the NRC.

Based on the sample of commitments reviewed, the NRC staff found that commitments tracked in accordance with procedure LS-AA-110, Revision 8, were implemented appropriately. Also, based on the sample of licensee submittals and the NRC staff safety evaluations reviewed, the NRC staff found that commitments were tracked as specified by procedure LS-AA-110, Revision 8.

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit was to verify that the licensee had 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 by LSCS is contained in LS-AA-110, Revision 8. Specifically, Section 4.6 of the procedure states that the commitment change process is consistent with the guidance provided in NEI 99-04. As described in LS-AA-110, if it is determined that a commitment is no longer valid or that there is a better way of implementing the commitment, then the commitment can be changed through the commitment change process. Attachment 1, "Commitment Change Evaluation Form," and Attachment 2, "Decision Making Guidance for Proposed Commitment Changes," of LS-AA-110, provide detailed instructions regarding making changes to a commitment, including the need to inform the NRC, and contain a data sheet to document the evaluation and approval of changes.

The audit also verifies that the licensee's commitment management system included 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 NRC staff found that procedure LS-AA-110, Revision 8, was consistent with the guidance found acceptable in NEI 99-04. The NRC staff concludes that the procedure used by the licensee to manage commitment changes is appropriate and that the licensee followed the process in their procedure.

The NRC staff reviewed the documentation associated with the changed commitments. The NRC staff observed that, LSCS had complete records and documented changes, appropriately, which ensure the traceability of commitments.

3.0 CONCLUSION

The NRC staff concludes, based on the above audit, that (1) LSCS has implemented NRC commitments on a timely basis, and (2) LSCS has implemented an effective program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Mitch Mathews
Joe Vergara
Stephen Shields

Principal Contributor: Araceli T. Billoch Colón

Attachment: Audit Summary

ATTACHMENT

SUMMARY OF AUDIT RESULTS

REGULATORY COMMITMENT AUDIT PERFORMED FROM NOVEMBER 7 - 8, 2011

LASALLE COUNTY STATION, UNITS 1 AND 2

AUDIT SUMMARY

IMPLEMENTATION OF COMMITMENTS

The following commitments were chosen for audit and determined to be properly implemented:

Regulatory Commitment Action Tracking Item No.	Subject/Description
00312082-35	Provide the results of the LSCS Unit 1 surveillance capsule test analysis to the NRC as required by 10 CFR 50 Appendix H "Reactor Vessel Material Surveillance Program Requirements," Section IV.A.
00354451-39	The Emergency Plan will be revised to include provisions for drills and exercises using terrorist-based events described in NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," Attachment 6, "Examples of Acceptable Changes to Security Related Drill and Exercise Program."
00123367	Deferral of the periodic general visual examination of the suppression pool surfaces (Item E1.12) and/or boiling water reactors vent system accessible surfaces (Item E1.20) if applicable to LSCS to the end of the inspection interval is permissible per Table IWE-2500-1 Examination Category E-A. If LSCS elects to defer the examinations, then all E1.12 examinations must be completed at the end of the interval (third period currently contains outages L2R15 and/or L2R16).
00439082-03	Actions for Implementation of Core Standby Cooling System License Amendment Request (LAR)
00760935	Commitment Tracking - NRC Generic Letter (GL) 2008-01: "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"
00766295-05	GL 82-12: "Nuclear Power Plant Staff Working Hours" LAR Implementation (Reference: 10 CFR 26 Subpart I New Work Hour Rule)
00815695	LAR regarding the application of Alternative Source Term (Resubmittal)

Regulatory Commitment Action Tracking Item No.	Subject/Description
00937164-01	Replace LSCS Unit 1 reactor water cleanup spool piece containing the dissimilar metal welds in refueling outage 13 (L1R13).
001030626-11	Measurement Uncertainty Recapture (MUR) - Plant-specific analyses for all potentially limiting events will be performed on a cycle-specific basis as part of the reload licensing process.
001166259-02	<p>Beginning 120 days after the LSCS Unit 2 refueling outage 13 (L2R13) and until October 28, 2011, the storage cells in the rack modules without NETCO SNAP IN® inserts will be placed into one of three categories (Unrestricted, Restricted and Unusable):</p> <p>(1) Unrestricted will be cells whose minimum panel B10 areal density is greater than or equal to 0.0167 g/cm², Unrestricted cells may contain fuel assemblies up to the maximum reactivity identified in TS 4.3.1.1.d.</p> <p>(2) Restricted will be cells whose minimum panel B10 areal density is between 0.0167 g/cm² and 0.0115 g/cm². Restricted cells will only contain LSCS Units 1 and 2 Cycle 1 General Electric (GE) and GE14 fuel assemblies.</p> <p>(3) Unusable will be cells whose minimum panel B10 areal density is less than or equal to 0.0115 g/cm². Unusable cells will be administratively controlled to remain empty of any fuel assembly.</p>
00794832-03	Technical Specifications Task Force (TSTF-475): "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action," Technical Specification Change Request
001030626-03	MUR - Plant maintenance and calibration procedures will be revised to incorporate Cameron's maintenance and calibration requirements.

M. Pacilio

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If you have any questions, please contact me at (301) 415-3302.

Sincerely,

/RA/

Araceli T. Billoch Colón, Project Manager
Plant Licensing Branch III-2
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