

**From:** Feintuch, Karl  
**Sent:** Friday, June 22, 2012 6:06 PM  
**To:** Barta, Doreen  
**Cc:** Browning, Tony  
**Subject:** ME6730 – DAEC – Regulatory Commitment Audit Report – data table completeness and fact checking  
**Attachments:** z ME6730 2011 RgCm Report 2012-06-22-1700 (data table only).doc

This message corresponds to my telephone call to you on June 22, 2012 at 5:00 PM ET.

An explanation of data I am looking for and an *AUDIT RESULTS* Table is attached with information derived from your records. Although I would certainly appreciate any errors that you would point out (a fact check), my main concern is that I was unable to locate certain specific items of data when compiling the table.

1 - In the table below xxxxx (3 locations, highlighted) indicates that I lack a reference to a commitment identification number (typically an AR# or COM#) from your system. Please provide them from your records.

2 – In the same table yyyyy (2 locations, highlighted) indicates that I lack one or more primary documents to review and cite as evidence of completion of the commitments associated with your adoption of TSTF-427.

2.1 - In the first location a document (or specific pages of interest if copying an entire document is not practical) describing or referencing the NUMARC guidance would be adequate. If the relevant document is a procedure, the affected page or revision history citation will be adequate.

2.2 - In the second location, please provide the date(s) that the barrier(s) became available and document(s) citing NEI 04-08 as guidance.

3 - If any portion of what I have requested remains in open status, please provide the affected pages of the commitment management program that track the open item(s) and expected date(s) of closure. If not obvious from the text, please consider applying highlight or other means to identify relevant content.

Please contact me with any questions, particularly if I can streamline your effort to respond.

Karl Feintuch  
USNRC  
301-415-3079

**Duane Arnold Energy Center  
AUDIT RESULTS**

<b>Letter Number and Date</b>	<b>Subject</b>	<b>Duane Arnold Commitment No.</b>	<b>Description of Commitment</b>	<b>Implementation Status</b>
NG-09-0116	Commitments initiated in RAI Response Letter NG-01-0909 dated 8/16/2001, Re: Extended Power Uprate licensing action under TAC MB0543. (Licensee in 2001 was Nuclear Management Company, LLC (NMC))	(no AR#; tracked under Electronic File System EFS# 09022701)	The Supplemental Reload Licensing Report for the actual first cycle of operation at the Extended Power Uprate condition of 1912 MWt will be submitted to the NRC with the Core Operating Limits Report for that cycle.	CLOSED: 2-27-09 via submittal of NG-09-0116  (Auditor observation: This sample exercised the capability of the DAEC commitment management program to effectively preserve and carry out commitments spanning changed facility ownership, changed licensee designation, and changed commitment management software platforms. – kdf 6/22/2012)
NG-08-0239, dated 5/8/2008	Three Month Response to NRC Generic Letter 2008-01, “Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”	AR 346268 AR 346269 COM030104	Submit a supplemental report to the original 9-month response, for those walkdowns and evaluations completed during the 2009 refueling outage, within 90 days after the start up from the outage.	CLOSED: As described in NG-09-0327 dated 4/27/2009 (Walkdowns done as described in various Work Orders in folder AR 346268)
NG-08-0239 dated 5/8/2008	Three Month Response to NRC Generic Letter 2008-01, Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems”	AR 346268 AR 346269 COM030103	Complete the detailed walkdowns and evaluations of those inaccessible sections of piping of GL subject systems, not otherwise exempted, prior to startup from the next Refuel Outage (currently scheduled for early 2009).	CLOSED: As described in NG-09-0327 dated 4/27/2009 (Walkdowns done on 3/2/2009, as described in various Work Orders in folder AR 346268)
NG-08-0777 dated 10/13/2008	Managing gas accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (9 month response to GL 2008-01)	AR 346276	FPLE Duane Arnold commits to submit to NRC proposed changes to TS based upon the final approved version of TSTF Traveler for unacceptable gas accumulation in ECCS, modified , as needed, within 180 days following NRC publication of the Notice of Availability of the TSTF Traveler (RE: GL2008-01)	OPEN as of 8/31/2011 Adoption of TSTF-523 rescheduled to 12/31/2011, due to continued non-availability of TSTF-523.
NG-09-0047 dated 1/30/2009	Tech Spec Change Re: Work Hour Restrictions, which became License Amendment 274	AR 346328	Removal of the TS requirements will be performed concurrently with the implementation of the 10 CFR Part 26, Subpart 1 requirements. Completed not later than 10/1/2009	COMPLETE Amendment 274 was reviewed under TAC ME0464 and issued on 9/18/2009. ADAMS document ML053050309, the DAEC Technical Specifications, contains the amended page.
NG-10-0067 dated 2/15/2010	Decommissioning Spent Fuel Management Program	AR 346393	Provide \$52 Million if license not renewed	CLOSED: License was renewed.
NG-07-0495, dated June 11, 2007	Licensee Event Report # 2007-008-00	CAP049511	Review O-Ring procurement and quality level process. (commitment in	CLOSED: O-Ring replaced and EDG was declared operable on April

			letter of interest for 2011 audit but item closed earlier	12, 2007, per LER 2007-008-00, as reported in NG-07-0495 August 27, 2007. Condition Evaluation completed.
NG-10-0559 dated 11/6/2010	Relief Request for Weld Overlay	AR 1680230	<p>Withdrawal of commitments contained in NG-10-0559 dated 10/6/2010 (Ref 1 of NG-10-0567):</p> <p>1) NextEra Energy Duane Arnold will perform an additional ultrasonic examination (UT) of the RRA-F002A weld prior to start-up from the current refuel outage (RF022) following Mechanical Stress Improvement Process (MSIP), if performed, on the adjacent RRA-F002 weld.</p> <p>2) NextEra Energy Duane Arnold will perform the required UT of the RRA-F002A1RRAJ003 weld overlay during the next refuel outage (RF023), currently scheduled for fall of 2012, and this exam will include the RRA-F002 weld, if MSIP has been applied to that weld during RF022.</p>	<p>WITHDRAWN:</p> <p>AR 1680230 contains record of withdrawal using NG-10-0567 as notification (see also AR 593772)</p>
NG-10-0601 dated 12/7/2010	Relief Request Re: PSV 4402	AR 1599991	<p>If there is an unplanned shutdown with a drywell entry before the next refueling outage (currently scheduled to begin in October 2012), another inspection of this mechanical joint will be performed at a minimum pressure of 940 psig to look for any evidence of leakage.</p> <p>This commitment supersedes the commitment made in NG-10-0597 dated 12/4/2010.</p>	<p>COMPLETE:</p> <p>Relief request was authorized under TAC ME5143. WO 4006850301 was work order to inspect PSV 4402. Work was completed and approved on 8/17/2011.</p>
NG-10-0597 dated 12/4/2010.	Relief Request Re: PSV 4402	AR 1688867	<p>If there is an unplanned shutdown with a drywell entry before the next refueling outage (currently scheduled to begin in October 2012), another inspection of this mechanical joint will be performed at a minimum pressure of approximately 940 psig to look for any evidence of leakage.</p>	<p>WITHDRAWN:</p> <p>Superseded (and thus withdrawn) by NG-10-0601 dated 12/7/2010</p>
NG-11-0267 dated 8/15/2011	Transition to NFPA-805 Fire Protection Standard	AR 1648614	<p>The Licensee Commitments, identified in Table S-1 and S-2 of Attachment S of the enclosed Transition Report, are proposed to support approval of the LAR. (At the time of the this audit this LAR, under TAC ME6818, is in active review with the potential of additional or changed</p>	<p>OPEN:</p> <p>TAC ME6818 is in progress with a projected completion in 2013. Licensee has anticipated change by preparing a High Impact Change Management Plan (NAMS 01623193) – multiple stakeholder signoffs between 8/8 to 8/18/2011</p>

NG-11-0117 dated 5/31/2011	Amendment Re: EAL Changes (since this regulatory commitment audit, this action has been issued as License Amendment 281 on 6/1/2012)	AR1654071	commitments). NextEra Duane Arnold commits to providing a review of the new classification scheme to State and local emergency management officials following NRC approval and prior to implementation	OPEN: As of the date of this report, closure is estimated to be on or before October 1, 2012, based on amendment issuance on June 1, 2012.
NG-07-0971 dated 12/20/07	Adoption of TSTF-475 pertaining to control rod notch testing frequency, which became License Amendment 271, dated 11/6/2008, under TAC MD7541	xxxxx	FPL [now NextEra] Energy Duane Arnold will establish the Technical Specification Bases for TS B 3.1.3 and TS B 3.1.4 consistent with those in TSTF-475, Revision 1, "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action."	COMPLETE: The commitment is as stated in NG-07-0971. The licensee identified this action internally as TSCR-098 in NG-07-0971. The serial number "098" is used as the Revision designation on the footer of the affected TS Bases pages. The changes on TS Bases pages B 3.1-17, -20, -21, -22, and -25 implement the commitment.
NG-10-0372 dated 8/12/2010	Adoption of TSTF-427, pertaining to unavailability of barriers, which became License Amendment 277, dated 2/28/2011, under TAC ME4546	xxxxx	NextEra Energy Duane Arnold commits to the guidance of NUMARC 93-01, Revision 2, Section 11, which provides guidance and details on the assessment and management of risk during maintenance. [To be implemented with the amendment]	COMPLETE: yyyyy
NG-10-0372 dated 8/12/2010	Adoption of TSTF-427, pertaining to unavailability of barriers, which became License Amendment 277, dated 2/28/2011, under TAC ME4546	xxxxx	NextEra Energy Duane Arnold commits to the guidance of NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427) Industry Implementation Guidance," March 2006. [To be implemented with the amendment, when the barrier(s) are available	COMPLETE: yyyyy
NG-10-0473 dated 9/27/2010	Cyber Security Plan, which became License Amendment 278, under TAC ME4287.	AR590737	Revise cyber security plan to clarify the scope of systems on or before 11/30/2010	COMPLETE: NG-10-0473 identifies the balance of plant (BOP) structures, systems and components (SSSCs) important to safety as those SSCs identified in Attachment 1 of the "Bright-Line" Survey in response to a Letter from Michael Moon (NERC*) to NextEra Energy Duane Arnold, "NERC's Response to the Completed Bright-Line Survey," dated August 27,2010.  [NERC is the North American Electric Reliability Corporation]