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Procedure Contains NMM REFLIB Forms: YES NO

Effective Date	Procedure Owner:	Charlene Faison Manager, Lic Programs	Governance Owner:	John McCann VP, Nuclear Safety, EP, and Licensing
1/23/12	Title:	WPO	Title:	WPO
	Site:		Site:	

Exception Date*	Site	Site Procedure Champion	Title
	ANO	David Bice	Senior Licensing Specialist
	BRP	Otto Gustafson	Manager, Licensing
	GGNS	Christina Perino	Manager, Licensing
	IPEC	Robert Walpole	Manager, Licensing
	JAF	Joe Pechacek	Manager, Licensing
	PLP	Otto Gustafson	Manager, Licensing
	PNPS	Frank McGinnis	Nuc Safety/Lic Spec IV
	RBS	Bill Fountain	Senior Licensing Specialist
	VY	Phil Couture	Licensing Specialist IV
	W3	Mike Mason	Senior Licensing Specialist
N/A	NP		
	HQN	Ronald Byrd	Senior Staff Engineer

Site and NMM Procedures Canceled or Superseded By This Revision
None

Process Applicability Exclusion: All Sites:
Specific Sites: ANO BRP GGNS IPEC JAF PLP PNPS RBS VY W3 NP


Change Statement

Revision 5 makes the following changes:

1. Adds a reference to NRC Office Instruction No. LIC-105
2. Deletes "active" and "passive" from the definition of "obligation".
3. Adds a note currently located in section 5.8 to section 5.5.
4. Adds new section 5.11 providing instructions for NRC commitment audit preparations.
5. Section 8.0 was reformatted to meet the Writer's Guide
6. A commitment summary section was added to the CCVF (Attachment 9.2).
7. Adds new Attachment 9.7 providing a format and example of a CCEF summary report.
8. Revises Attachment 9.1 to clarify the term "Regulatory Commitment" as discussed in NEI 99-04.
9. Revises Attachment 9.1 to add a discussion of "sunset clauses" consistent with NEI 99-04.
10. Changes the term "Fire Hazards Analysis" to "Fire Protection Program" in Part 1 of Attachment 9.4 to be consistent with NEI 99-04.
11. Makes editorial and administrative changes.
12. Changed the flowcharts to match NEI 99-04.
13. CCEF question 4.2 was revised to instruct the evaluator to stop and notify site Licensing if the commitment has not been implemented.

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1.0 PURPOSE

- [1] The purpose of this procedure is to ensure that commitments made to the NRC in written correspondence are actively managed through the use of a Commitment Management System (CMS). Management includes capturing new commitments, changing existing commitments, and closing/deleting commitments.
- [2] The process detailed in this procedure ensures that new commitments are captured for future reference; that changes to past commitments are controlled, and that a system to assist Entergy personnel to identify past commitments is established and maintained. This procedure also includes provisions for notifying the NRC of changes to a commitment when appropriate.
- [3] This procedure is based on and implements the recommendations of NEI 99-04 "Guidelines for Managing NRC Commitment Changes," Revision 0.
- [4] The process outlined in this procedure focuses on commitments and is not intended to track obligations or action items. While some CMSs have historically been used to manage information other than Regulatory Commitments, the preferred approach is to segregate Regulatory Commitments in a CMS. These "combined-use" CMSs can be used to satisfy the requirements of this procedure provided Regulatory Commitments are clearly distinguished from other information.

2.0 REFERENCES

- [1] Corporate References
- EN-AD-101, *Procedure Process*
 - EN-AD-103, *Document Control and Records Management Programs*
 - EN-LI-100, *Process Applicability Determination*
 - EN-LI-101, *10 CFR 50.59 Evaluations*
 - EN-LI-102, *Corrective Action Process*
 - EN-LI-103, *Operating License Amendments*
 - EN-LI-106, *NRC Correspondence*
- [2] ANO References
- 1000.006, *Procedure Control*

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[3] GGNS References

- 01-S-02-3, *Author's Guide*
- 01-S-15-5, *Directive Submittal Requirements for Requirements Procedure Tracking System (RPTS)*

[4] RBS References

- RBNP-001, *Control and Use of RBS Procedures*

[5] W3 References

- W2.109, *Procedure Development, Review and Approval*
- NOECP-150, *Substitute Part Engineering Evaluation Report*

[6] Industry References

- Nuclear Energy Institute (NEI), *Guidelines for Managing Commitments*, NEI-99-04 Rev. 0, July 1999
- Nuclear Regulatory Commission (NRC) Office Instruction No. LIC-105, *Managing Regulatory Commitments Made by Licensees to the NRC*.


3.0 **DEFINITIONS**

[1] Authorized Representative – Designated licensee individual(s) with the authority to commit utility resources (e.g., site VP or an individual authorized to sign letters to the NRC).

[2] Closure Document – Documentation that provides objective evidence that the actions required by a commitment or action item have been completed.

[3] Commitment Management System (CMS) – A database, or file, that is used to track the status of commitments. CMS may be implemented using written (paper) records or lists, or using a computer-based database (e.g. LRS). Information captured in the CMS should include a description of the commitment, the origin of the commitment, responsible department or individuals and the due date, if applicable. Obligations and/or internal actions may also be tracked in CMS.

[4] Commitment Priority – A designator that may be assigned to each commitment. The following criteria may be used:


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HARD An obligation or commitment that must be completed by a specific date or event as required by regulation or identified in docketed correspondence.

SOFT A commitment/internal action that must be performed but does not have an associated regulatory required due date.


- [5] Implementing Document – A controlled document such as a procedure, instruction, or lesson plan which totally or partially accomplishes the specific actions required by one or more commitments.
- [6] Implementing Document Change – Any revision, deletion or modification to a document which implements commitments.
- [7] Internal Action – Items that may be tracked in the CMS that do not meet the definition of either regulatory commitment or obligation.
- [8] Licensing Research System (LRS) – Computer software employed to implement the CMS.
- [9] Obligation – Any condition or action that is a legally binding requirement imposed on licensees through applicable rules, regulations, orders, and licenses (including technical specifications and license conditions).
- [10] Regulatory Commitment – An explicit statement to take a specific action agreed to or volunteered to by the facility and submitted in writing to the NRC on the docket. Referred to as “commitment” or “regulatory commitment” throughout this procedure. Section 3.1 of NEI 99-04 describes key differences between regulatory commitments and obligations and provides examples.

Licensees frequently communicate their intent to take certain actions to restore compliance with Obligations, to define a certain method for meeting Obligations, to correct or preclude the recurrence of adverse conditions, or to make improvements to the plant or plant processes. A Regulatory Commitment is an intentional undertaking by a licensee to (1) restore compliance with regulatory requirements, or (2) complete a specific action to address an NRC issue or concern (e.g., generic letter, bulletin, order, etc.). With respect to corrective actions identified in a Notice of Violation (NOV) response or Licensing Event Report (LER), the specific method(s) used by licensees to restore compliance with an obligation are not normally considered a Regulatory Commitment. The Regulatory Commitment in this instance is the promise to restore compliance with the violated obligation.

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Commitments may be classified as follows:

- Active Regulatory Commitment – An explicit statement that is contained or referenced in a source document that establishes requirements or promises actions to be performed (tracks *initial* implementation).
 - Passive Regulatory Commitment – An explicit statement that is contained or referenced in a source document stating that actions which have been previously taken will be maintained. Implementation can be through procedures, instructions, or other administratively controlled actions such as task cards or lesson plans (tracks *continuing compliance* following implementation).
- [11] Responsible Department – A department that uses CMS or has responsibility for implementing commitments, obligations, or action items.
- [12] Senior Management – For the purpose of this procedure, this means each site Vice President (VP), those who directly report to the VP, and individuals authorized to sign correspondence to the NRC.
- [13] Status – A group of codes that may be used to identify the status of actions in the CMS. The following primary status codes may be used:
- | | |
|---------------|--|
| OPEN | Tracks completion of actions. A status of ‘OPEN’ may mean the action has not been completed or that documented evidence of completion has not been received and reviewed by site Licensing. |
| CLOSED/CLSD | Designates that a committed action has been completed, applicable documented evidence of completion has been received and accepted by site Licensing, and the commitment/obligation is no longer required to be tracked for continuing compliance. |
| NSAT | Identifies a continuing compliance obligation or commitment which no longer identifies an appropriate implementing document. NSAT is an interim status until continuing compliance is re-identified. |
| SAT/IMPLEMENT | Identifies a continuing compliance obligation or commitment which is satisfactorily being implemented by a procedure, lesson plan or other administratively controlled document. |

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HISTORIC/HIST/
RETIRED/NEI Identifies that a Commitment Change Evaluation Form (CCEF) has been completed and approved for the associated commitment and the commitment implementation no longer needs to be tracked in CMS or in an implementing document.

COMP Action complete and in site Licensing review.

EVAL/PENDING/
RV Commitment Change Evaluation required or under review by site Licensing.

CHANDU/NRC Awaiting NRC approval or response.

SUPERSEDED Superseded

4.0 **RESPONSIBILITY**


[1] Site Vice Presidents are responsible for authorizing new commitments for their respective sites.

[2] Site Department Heads / Plant Managers/Supervisors are responsible for:

- Ensuring that commitments are completed by the assigned due date.
- Ensuring that commitments implemented by procedures are identified in the affected document and maintained.
- Ensuring that CCEFs are completed, provided to site Licensing, and approved by the appropriate site Licensing Manager (or designee) prior to implementing the change.

[3] Site Licensing Managers or designees are responsible for:

- Implementing this procedure at their respective sites.
- Establishing and maintaining the Commitment Management Program.
- Ensuring that commitment management activities are completed in accordance with the requirements of this procedure.
- Approving completed CCEFs.
- Ensuring that CCEFs that address sensitive issues receive appropriate management review.

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- Ensuring that the NRC is notified of changed commitments or plans to change commitments in accordance with the requirements of this procedure.
- Ensuring that completed CCEFs are transmitted to each site's records management department, if required.
- Ensuring that changed commitments are periodically reported to the NRC, as applicable.

[4] Site Licensing Personnel are responsible for:

- Reviewing NRC related correspondence to identify new commitments.
- Ensuring that commitments are entered into the CMS. This includes commitments made on behalf of the plant by off-site organizations such as Entergy's corporate offices, and industry organizations like the Nuclear Energy Institute.
- Coordinating commitment prioritization with cognizant departmental personnel.
- Escalating items to the appropriate level of management should commitments become overdue or the potential exists for missing a HARD commitment due date.
- Submitting a report of commitment changes on a period basis to the NRC.

[5] Nuclear Employees are responsible for:

- Assuring compliance with commitments within their area of responsibility.
- Providing accurate and timely update information to site Licensing and documenting closure information for active commitments and internal actions.
- Reviewing implementing document changes against the commitment report/requirements cross-reference list to assure the change continues to implement applicable commitments.
- Updating and forwarding to site Licensing, reports about procedure revisions and deletions and document changes regarding commitment implementation.

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- Obtaining approval and acceptance from the new responsible department when ownership for implementing a commitment transfers from one department to another.
- Revising commitments and obligations in accordance with this procedure.

5.0 **DETAILS**

5.1 PRECAUTIONS AND LIMITATIONS

None

5.2 GENERAL

- [1] General philosophy related to commitments is contained in Attachment 9.1.
- [2] Responsible departments should review commitments captured in the CMS for accuracy as implemented by their procedures and ensure that commitments are maintained in their entirety.


5.3 IDENTIFICATION OF COMMITMENTS

- [1] Written correspondence (letters, reports, etc.) sent to the NRC constitute the primary source of commitments. Written correspondence to the NRC is processed as detailed in EN-LI-106.

NOTE

The review of NRC safety evaluation reports associated with Technical Specification (TS) changes are addressed in EN-LI-103.

- [2] Site Licensing should also review applicable correspondence from the NRC (such as NRC confirmatory action letters, inspection reports, and safety evaluation reports) to ensure that:
- (a) Any implicit or explicit re-statements of the licensee's regulatory commitments are accurate, and
 - (b) The NRC has not misconstrued oral or written communications as commitments.
 - (c) The NRC should be promptly notified if inaccurate statements are identified. Site Licensing should determine if this notification is performed verbally or in writing.

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5.3 continued

- [3] When fleet letters contain commitments, a Paperless Condition Reporting System (PCRS) LO should be initiated with a CA assigned to each applicable site to enter the commitments into the site's commitment management system, in accordance with EN-LI-106, Attachment 9.4, "NRC submittal review" requirement.

5.4 NEW COMMITMENTS


- [1] After commitments have been identified as discussed above and per EN-LI-106, site Licensing enters or changes the commitments in the CMS.
- [2] Each commitment should be assigned a due date and priority code, if applicable, to ensure that associated schedules are met.
- (a) Unless a predetermined date already exists (e.g., NRC order, generic letter response), dates for completing commitments should be determined by the responsible department manager and may be identified in the correspondence that contains the commitment.
- [3] The type of information typically entered into the CMS for commitments is shown in Attachment 9.6, Example of CMS Data.

5.5 CHANGES TO COMMITMENTS

NOTE

Due to the sensitivity of some issues, Entergy may choose to notify the NRC prior to making changes to commitments even though the CCEF would not require prior NRC notification.

- [1] When changes to commitments are necessary, commitments are changed in accordance with the Commitment Change Process shown in Attachment 9.3.
- [2] Changes to commitments should be documented on a form similar to the Commitment Change Evaluation Form (CCEF) shown in Attachment 9.4. Attachment 9.5 provides guidance for completing each step of the CCEF.
- [3] PCRS LOs may be used to coordinate changes to commitments and retain copies of CCEFs. If used, the CMS should reference the PCRS LO number.


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5.5 *continued*

- [4] If it is desired to change a commitment that has never been implemented, site Licensing should be contacted prior to processing a CCEF. Site Licensing makes a determination of whether the NRC needs to be notified and the method of notification.

5.6 COMMITMENT CLOSURE

- [1] Upon completion of the actions required by an active commitment, the responsible department should normally complete a form similar to a Commitment Closure Verification Form (CCVF) (Attachment 9.2), attach sufficient objective evidence (or provide reference to where evidence can be retrieved) to justify closure and send this information to site Licensing.
- (a) Site Licensing may determine that a CCVF is not required if the implementing document is verified by Licensing, is retrievable from records, and the CMS is updated to provide a clear link to the implementing document.
- (b) The following methods may be used to satisfy objective evidence requirements:
- (1) A memo, condition report corrective action closure, engineering request, procedure or other working level documentation signed by an individual who is cognizant of the implementation of the commitment and by the responsible management that indicates the actions have been completed.
 - (2) Correspondence signed by the responsible manager which verifies that required action(s) have been completed.
- (c) Other written correspondence may be used in lieu of the CCVF.
- (d) If completing the actions required by an active commitment includes revising a controlled document (procedure, lesson plan, preventive maintenance task, etc.), site Licensing should verify the document has been updated and is active.
- (e) If appropriate per the parent correspondence (see LI-106 commitment identification information), site Licensing should classify or transfer the commitment for continuing compliance tracking when the review indicates that the document(s) adequately satisfies the commitment. Refer to Steps 3.0[10] and 3.0[13].

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5.6[1] *continued*

- (f) Plant Licensing ensures that objective evidence, which forms the basis for the closure of a commitment, is retrievable or capable of being recreated. PCRS LOs may be used to document commitment closure verifications and retain copies of CCVFs, if desired.
- (g) Upon completion of the actions required by an active commitment, site Licensing should add a reference, comment, or note in CMS to link the implementing document with the commitment.

5.7 CANCELING/HISTORIC COMMITMENT TRACKING


- [1] As a result of changes in circumstances, a commitment may be rendered irrelevant or no longer useful. This may include commitments that have been tracked for more than two years and are well established in work processes or otherwise embedded in site processes. In these situations, a commitment may be removed from continuing tracking (see Step 3.0[13] for status changes that may be used to indicate continuing tracking is no longer required).
- [2] The change originator should complete a CCEF in accordance with this procedure.
- [3] Upon approval, site Licensing should update the CMS to reflect the change.

5.8 REPORTING CHANGES TO COMMITMENTS

NOTE

Due to the sensitivity of some issues, Entergy may choose to notify the NRC prior to making changes to commitments even though the CCEF would not require prior NRC notification.

- [1] When required, changes to commitments should be communicated to the NRC in accordance with the Commitment Change Process shown in Attachment 9.3. Site Licensing should determine if this notification will be performed verbally or in writing.
- [2] A report of completed CCEFs that are required to be reported per the commitment change process should be submitted to the NRC on a periodic basis.
 - (a) The report may be the same frequency as the UFSAR/10 CFR 50.59 summary report, or once per operating cycle. Commitment changes reported to the NRC elsewhere need not be duplicated in this report.

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5.8[continued]


- (b) The CCEFs which require reporting may be summarized in the report or provided in their entirety. A recommended format for a CCEF summary report is provided in Attachment 9.7.

5.9 CHANGES TO DOCUMENTS THAT IMPLEMENT COMMITMENTS

NOTE

Commitment reports may be obtained by accessing the LRS program, if available, or by contacting site Licensing.

- [1] The department originating a revision to an implementing document should obtain a commitment report that identifies the commitments implemented by the document being revised.
- [2] The document change should be reviewed against the commitment report to determine whether or not the change will maintain satisfactory implementation of the commitments. This review is intended to supplement but not replace other required reviews (e.g., 10 CFR 50.59, technical reviews, etc.).
- [3] If the document review indicates the commitment would be more appropriately located in a document owned by another department, the person that originates the transfer of the commitment should obtain approval and acceptance of ownership with the new department. Site Licensing personnel should not make CMS changes without ensuring that a transfer of ownership was coordinated by the parties involved.
- [4] When practical, commitment-implementing document information should include the paragraphs that specifically implement the commitment.
- [5] If a planned document change would result in a commitment not being implemented, suspend further processing of the document revision, contact site Licensing, and process a CCEF in accordance with this procedure.
- [6] Significant changes to implementing commitment information (changes other than procedure revision or effective date) should be provided to site Licensing by the originator of the change for CMS entry/update upon approval of the procedure change. Examples of implementing document changes to be forwarded to site Licensing include:
 - A procedure is being deleted that implements one or more commitments. The change originator should provide the new implementing document or the procedure and section that will now satisfy implementation of the commitment(s).

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5.9[6] *continued*

- The procedure implementing a commitment has undergone reformatting thereby relocating the section or paragraph that implements the commitment. The change originator should provide a marked-up commitment report showing the new or revised section(s) or paragraph(s).

[7] Site Licensing reviews updated commitment implementation information and incorporates the data into the CMS. Any questions or concerns associated with the data must be resolved with the responsible department.

5.10 OBLIGATIONS

[1] Changes to obligations shall be conducted in accordance with the applicable regulatory process. The available statutory based mechanisms include petitions for rulemaking under 10 CFR 2.802, exemption requests under 10 CFR 50.12, license amendment requests under 10 CFR 50.90, changes to certain plans under 10 CFR 50.54 and requests to modify or rescind orders issued under 10 CFR 2.202.


[2] If obligations are tracked in CMS, then the following should be performed:

- (a) Obligations that are implemented by procedures should be explicitly cross-referenced or identified in the procedure. This ensures traceability of the obligation.
- (b) If ownership for implementing an obligation transfers from one department to another, the person that originates the transfer should obtain approval and acceptance of ownership with the new department. Site Licensing personnel should not make CMS changes without ensuring that a transfer of ownership was coordinated by the parties involved.
- (c) Significant changes to implementing obligation information (changes other than procedure revision or effective date) should be provided to site Licensing for CMS entry/update upon approval of the procedure change. See Step 5.9[6] for examples of implementing document changes that should be forwarded to site Licensing.

5.11 INTERNAL ACTIONS

[1] Examples of internal actions are:

- Licensee-intended actions identified in an incoming NRC inspection report,

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5.11[1] *continued*

- Consideration of concerns expressed by the NRC in an inspection report,
- Intention to take an action which is verbally communicated to the NRC,
- Continuing compliance items entered as a result of an evaluation of industry events, or
- Self-imposed commitments entered to prohibit or limit the procurement and use of certain materials, parts, components or systems; or to describe a specific course of action which will not be taken.

[2] Upon completion of an internal action, the responsible department should provide sufficient objective evidence to justify closure and forward the information to site Licensing. The following means may be used to satisfactorily close an internal action:

- (a) An NRC inspection report in which the inspector acknowledges the action has been completed.
- (b) Examples included in Step 5.5[4].

5.12 NRC Commitment Audit Preparation

[1] Prior to the NRC conducting a regulatory audit of commitments, site Licensing should conduct a snapshot self-assessment using EN-LI-104.

[2] The self-assessment should be performed on the list of commitments requested by the NRR Project Manager. Alternatively, site Licensing may select a sample of commitments made since the last audit, including any commitments made in corporate-level correspondence on behalf of the site.

[3] The assessment should include the following:

- (a) A review of the previous NRC commitment audit report and the resolution of any corrective actions that resulted from any negative observations, weaknesses, or deficiencies noted in the report.
- (b) A review of NRR Office Instruction LIC-105.
- (c) For each commitment selected for the assessment, ensure that the commitment has been adequately implemented, managed, and reported in accordance with this procedure.

6.0 INTERFACES


- [1] NMM Procedure EN-LI-100, *Process Applicability Determination*
- [2] NMM Procedure EN-LI-101, *10 CFR 50.59 Evaluations*
- [3] NMM Procedure EN-LI-102, *Corrective Action Process*
- [4] NMM Procedure EN-LI-103, *Operating License Amendments*
- [5] NMM Procedure EN-LI-106, *NRC Correspondence*
- [6] NMM Procedure EN-AD-101, *Procedure Process*
- [7] NMM Procedure EN-AD-103, *Document Control and Records Management Activities*

7.0 RECORDS

Although not a QA record, completed CCEFs should be retained and retrievable for the life of the plant unless the NRC was notified of the change.

8.0 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Commitment Number or Reference
[1]	GGNS	AECM-83/0177 Page 38, Item 4.1.4	P23954
[2]	W3	IR 84-07 Section 8.6	P128
[3]	W3	PLIFR Section 3.2.B.1.F	P4669
[4]	W3	IR 89-26-01	P16739
[5]	W3	W3F191-0383	P17734
[6]	JAF	JPN-92-063	A13689

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9.0 ATTACHMENTS

Attachment 9.1 Commitment Guidelines

Attachment 9.2 Commitment Closure Verification Form


Attachment 9.3 Commitment Change Evaluation Process

Attachment 9.4 Commitment Change Evaluation Form [Typical]

Attachment 9.5 Commitment Change Evaluation Process Guidelines

Attachment 9.6 Example of CMS Data

Attachment 9.7 CCEF Summary Report Format

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ATTACHMENT 9.1 ----- COMMITMENT GUIDELINES
Sheet 1 of 2


Licenses frequently communicate their intent to take certain actions to restore compliance with obligations, to define a certain method for meeting obligations, to correct or preclude the recurrence of adverse conditions, or to make improvements to the plant or plant processes. A commitment is an intentional undertaking by a licensee to (1) restore compliance with regulatory requirements, or (2) complete a specific action to address an NRC issue or concern (e.g., generic letter, bulletin, order, etc.).

With respect to corrective actions identified in a NOV response or LER, the specific method(s) used by licensees to restore compliance with an obligation are not normally considered a Regulatory Commitment. The Regulatory Commitment in this instance is the promise to restore compliance with the violated obligation.

In the past, not all licensee correspondence has clearly distinguished between Regulatory Commitments (e.g., promises to restore compliance to a violated obligation by a certain date) and factual statements, descriptive information and voluntary enhancements not intended to constitute a Regulatory Commitment. Potential confusion resulting from this lack of clarity may require dialogue between a licensee and the NRC on a case-by-case basis. To avoid confusion, licensees should distinguish clearly between regulatory commitments to restore compliance with NRC rules and regulations and voluntary enhancements, routine corrective actions taken in accordance with quality assurance programs, and other descriptive information.

[1] The following guidance should be considered when making commitments:

- (a) Commitments and their relative importance should be based upon an evaluation of the safety benefit that will be obtained; the pertinent legal requirement, if any; the technical bases for the completed action or activity; and the resources available, in the context of other requirements and commitments.
- (b) The cost (both initial costs and those that would be incurred over the life of the unit) and value added of an action being considered in response to a NRC request should be carefully evaluated, including consideration of any pertinent regulatory requirement(s).
- (c) In general, commitments to take certain actions involving significant resource expenditures should be avoided and not be made in response to observations made during either routine or special inspections until:
 - (1) after receipt of the written inspection report that identifies the particular matter and describes the NRC's concern regarding that matter;
 - (2) after completing an evaluation to ensure the root cause of the NRC's concern will be corrected by the proposed action; and
 - (3) after obtaining the approval of the designated senior management person responsible.

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ATTACHMENT 9.1 ----- COMMITMENT GUIDELINES

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- (d) When making a commitment, it may be appropriate to include a “sunset clause” in the commitment to establish a period of time to evaluate the effectiveness of the commitment. For example, a commitment may state that the plant will conduct fire watches until a design issue is resolved or it may state that a situation will be monitored for a specified period of time. Such commitments, once implemented, would automatically expire at the end of the period (i.e., the commitment is closed and further tracking is not required).

[2] Oral Statements

- (a) Oral statements to take certain actions represent intent to make a commitment, but do not constitute a commitment until submitted in writing, on the docket by the licensee. (This would not apply to "discretionary enforcement" situations).
- (b) Oral statements to take certain actions involving significant levels of resources or expenditures should be avoided and not be made in response to observations made during either routine or special inspections until:
- After receipt of the written inspection report that identifies the particular matter and describes the NRC’s concern regarding that matter;
 - After completing an evaluation to ensure the root cause of the NRC’s concern will be corrected by the proposed action; and
 - After obtaining the approval of the designated senior management individual.

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ATTACHMENT 9.2 ----- COMMITMENT CLOSURE VERIFICATION FORM {TYPICAL}
Sheet 1 of 1

LRS/CMS I.D. _____ Source /Parent Document _____

Commitment Summary Restate or paraphrase the commitment

Extent of Closure Full Partial

Means of Closure List the closure documents (e.g., letter, procedure, etc.) from which objective evidence of commitment closure can be obtained.¹

Note 1: Objective evidence from the listed closure documentation must be attached or reference provided regarding where the documentation may be retrieved.

Responsible Lead Person

Date

Site Licensing

The objective evidence supports the Extent of Closure indicated above AND the commitment tracking system has been updated.

Site Licensing Signature

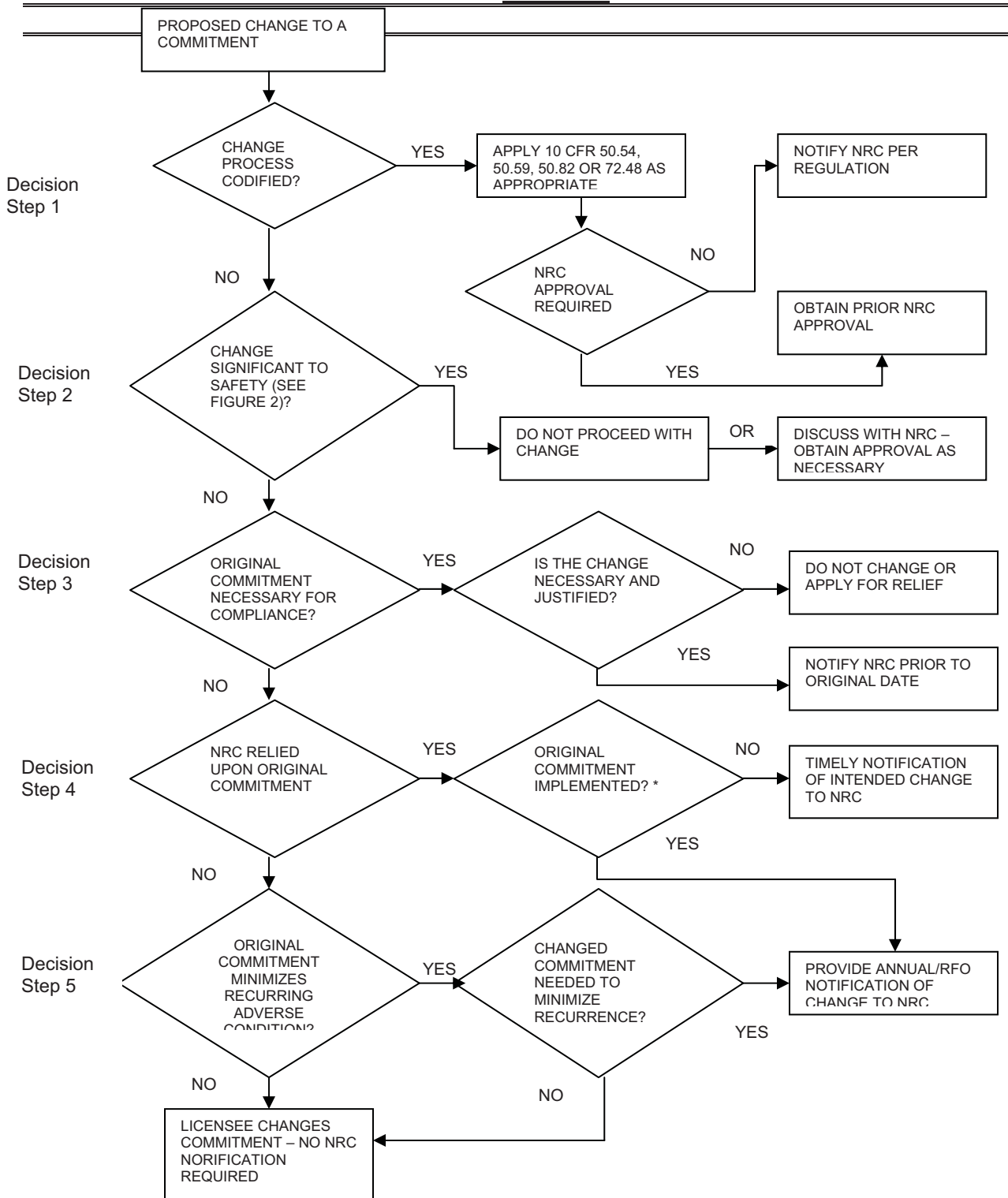
Date



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ATTACHMENT 9.3 ----- COMMITMENT CHANGE EVALUATION PROCESS
Sheet 1 of 1

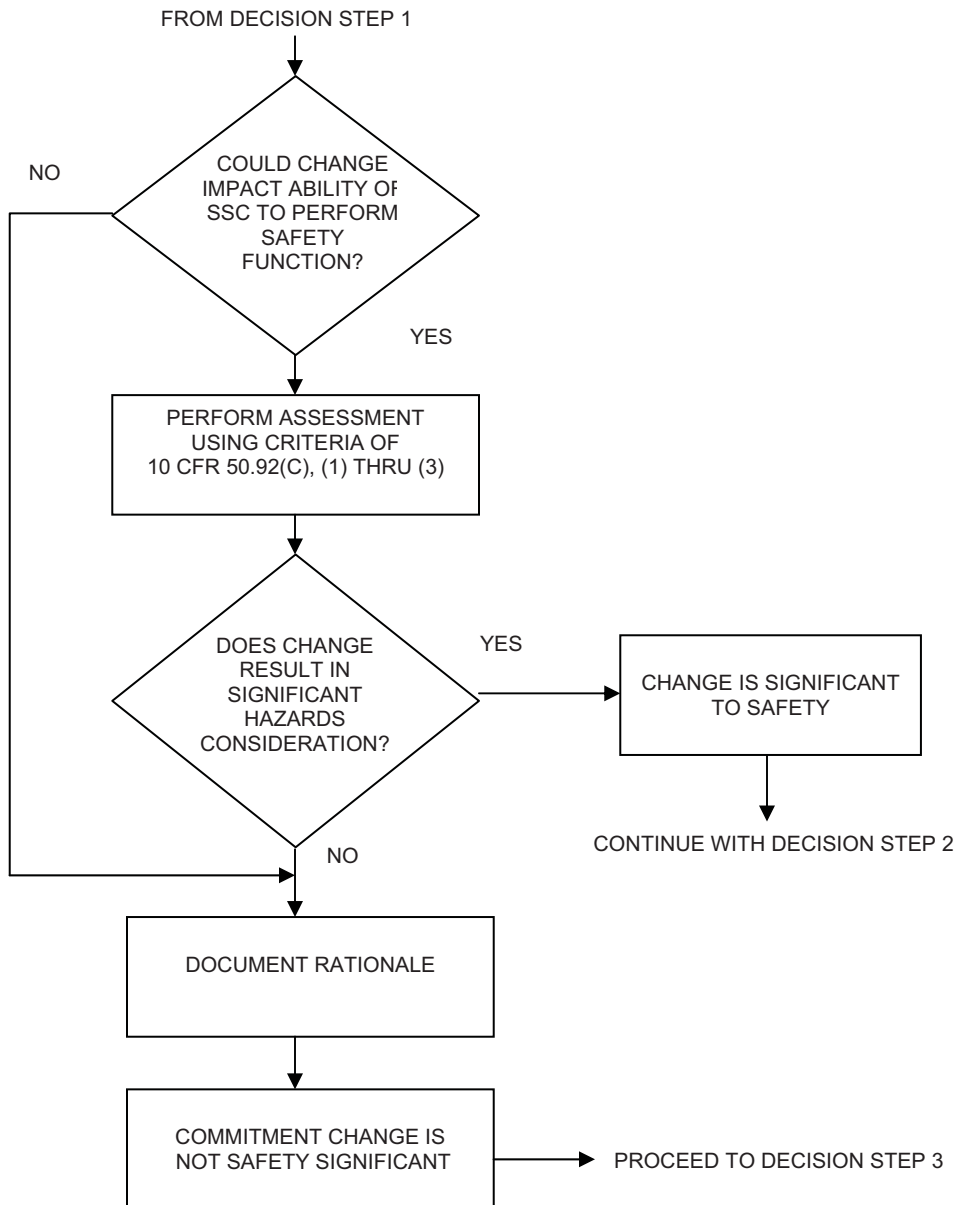
FIGURE 1




* For long term corrective actions made in response to a notice of violation, see Attachment 9.5, Part III

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FIGURE 2
Safety Significance Assessment (Decision Step 2)



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ATTACHMENT 9.4 ----- COMMITMENT CHANGE EVALUATION FORM {TYPICAL}
Sheet 1 of 4

LRS/CMS I.D. _____ Site Licensing Tracking Number: _____

Source Document / Date: _____

Commitment: Cancellation Revision
 Historic/Hist/Retired/NEI Superseded

Has the original commitment been implemented? YES NO, stop and notify site
Licensing

Original Commitment Description:

Revised Commitment Description:


Summary of Justification for Change (attach additional sheets if necessary):

Prepared By: _____ Date: _____
Print Name / Signature

Management Approval: _____ Date: _____
Print Name / Signature

Forward completed form to site Licensing.

Site Licensing Management
(or designee) Concurrence: _____ Date: _____
Print Name / Signature

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ATTACHMENT 9.4 ----- COMMITMENT CHANGE EVALUATION FORM {TYPICAL}
Sheet 2 of 4

PART I

- 1.1** Is the existing commitment located in the Updated Final Safety Analysis Report, Emergency Plan, Quality Assurance Program Manual, Fire Protection Program, or Security Plan?
- YES STOP. Do not proceed with this evaluation. Instead use appropriate codified process (e.g., 10 CFR 50.71(e), 10 CFR 50.54, 10 CFR 50.59, 10 CFR 50.55) to evaluate commitment
- NO Go to Part II.

PART II

- 2.1** Could the change negatively impact the ability of a System, Structure, or Component (SSC) to perform its specified safety function or negatively impact the ability of plant personnel to ensure the SSC is capable of performing its specified safety function?
- YES Go to Question 2.2.
- NO Continue with Part III. Briefly describe rationale:
- 2.2** Perform a safety evaluation using the following 10 CFR 50.92 criteria to determine if a significant hazards consideration exists:
- Does the revised commitment involve a significant increase in the probability or consequences of an accident previously evaluated?
- YES NO Describe basis below
- Does the revised commitment create the possibility of a new or different kind of accident from any previously evaluated?
- YES NO Describe basis below

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ATTACHMENT 9.4 ----- COMMITMENT CHANGE EVALUATION FORM {TYPICAL}
Sheet 3 of 4

- Does the revised commitment involve a significant reduction in a margin of safety?

YES NO Describe basis below

If any of the above questions are answered Yes, STOP. Do not proceed with the revision, OR discuss change with NRC and obtain necessary approvals. IF NRC approval obtained, THEN revise commitment; no further evaluation is required and no further NRC notification is required. IF all three questions are answered NO, THEN go to Part III. (Attach additional sheets as necessary.)

PART III

3.1 Was the original commitment (e.g., response to NOV, etc.) to restore an obligation (e.g., rule, regulation, order or license condition)?

YES Go to Question 3.2.

NO Continue with Part IV.

3.2 Is the proposed revised commitment date necessary and justified?

YES Briefly describe rationale (attach additional sheets as necessary). IF commitment not yet implemented, THEN notify NRC of revised commitment date prior to the original date in which the commitment was to be completed/satisfied.

NO STOP. Do not proceed with the revision, OR apply for appropriate regulatory relief. IF NRC approval obtained, THEN revise commitment; no further evaluation is required and no further NRC notification is required.

PART IV

4.1 Was the original commitment: (1) explicitly credited as the basis for a safety decision in an NRC SER, (2) made in response to an NRC Bulletin or Generic Letter, or (3) made in response to a request for information under 10 CFR 50.54(f) or 10 CFR 2.204?

YES Go to Question 4.2.

NO Continue with Part V.

ATTACHMENT 9.4 ----- COMMITMENT CHANGE EVALUATION FORM {TYPICAL}
Sheet 4 of 4

4.2 Has the original commitment been implemented?

- YES STOP. You have completed this evaluation. Revise the commitment and notify NRC of revised commitment in CCEF summary report or in a docketed letter specific to the commitment change.
- NO STOP. Notify Site Licensing. Timely notification of intended change to NRC is required if commitment change is pursued. Attach documentation of NRC notification.

PART V

5.1 Was the original commitment made to minimize recurrence of a condition adverse to quality (e.g., a long-term corrective action stated in an LER)?

- YES Go to Question 5.2.
- NO STOP. You have completed this evaluation. Revise the commitment. No NRC notification required.


5.2 Is the revised commitment necessary to minimize recurrence of the condition adverse to quality?

- YES Revise the commitment and notify NRC of revised commitment in next CCEF summary report.
- NO Revise commitment. No NRC notification is required.

REFERENCES

List below the documents (e.g., procedures, NRC submittals, etc.) affected by this change.

Doc. Number / ID	Description

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ATTACHMENT 9.5 ----- COMMITMENT CHANGE EVALUATION PROCESS GUIDELINES
Sheet 1 of 5

The purpose of the Commitment Change Evaluation Form (CCEF) is to outline a commitment change process that (1) delineates commitments that have safety significance and/or regulatory interest; (2) establishes guidance for notifying the NRC of changes to commitments that have safety significance and/or regulatory interest; and (3) establishes a rationale for eliminating past commitments that have negligible safety significance and/or regulatory interest. The CCEF, when completed, provides an adequate level of documentation for the decisions made in revising a commitment using this change process.

Where the form calls for a description of the rationale for a decision, it is expected that, in the majority of instances, a justification of one or two sentences would be sufficient. In some cases a more detailed explanation or reference to a backup assessment may be appropriate. The intent is not to generate lengthy descriptions supported by detailed analyses, but rather to capture the essence of the basis for changing the commitment.

NOTE

Due to the sensitivity of some issues, it may be appropriate to notify the NRC prior to making changes to commitments even though the Commitment Change Process would not require such action.


Guidance to complete the form is provided below:

Identify the applicable “Commitment Identifier,” if applicable. The “Commitment Identifier” may be an alphanumeric number located in the CMS. “Commitment Identifiers,” if applicable, may be obtained by contacting Plant Licensing. If applicable, the “Site Licensing Tracking Number” will be assigned by site Licensing subsequent to review and approval of the CCEF.

The “Source Document” should be clearly identified by type (e.g., LER, NOV response, etc.) number, and date. If the original commitment has not been implemented, then promptly notify site Licensing so that the condition can be communicated to the NRC.

Describe the original commitment. If the commitment is being deleted, state that the commitment is being deleted; a revised commitment description is not necessary. However, if the commitment is being changed, then provide a description of the revised commitment. Summarize the justification for change.

Complete the appropriate sections of the CCEF. The completed CCEF must be signed by the Preparer, approved by the appropriate supervisor and forwarded to site Licensing for review and approval.

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ATTACHMENT 9.5 ----- COMMITMENT CHANGE EVALUATION PROCESS GUIDELINES
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PART I

Commitments embodied in the UFSAR, TRM, and TS Bases as descriptions of the facility or procedures are changed by applying the provisions of 10 CFR 50.59. Nuclear Management Manual EN-LI-100 Process Applicability Determination and EN-LI-101 10 CFR 50.59 Evaluations describes the methods for applying the provisions of 10 CFR 50.59. If a 10 CFR 50.59 evaluation completed per EN-LI-101 determines that the commitment may be changed, the NRC will be notified of the change coincident with filing the 10 CFR 50.59 Summary Report.


Commitments that are contained in certain programs and plans required by 10 CFR 50.54 are changed by applying the provisions of the applicable section of 10 CFR 50.54 [50.54(a) for Quality Assurance Program Manual, 10 CFR 50.54(p) for Safeguards Contingency Plan, or 10 CFR 50.54(q) for Emergency Plan]. Changes that do not "reduce commitments" in the Quality Assurance Program Manual or that do not "reduce the effectiveness" of the Safeguards Contingency (Security) Plan or Emergency Plan may be made without prior NRC review and approval with notification of the change as specified in the applicable 10 CFR 50.54 section.

Thus, changes to commitments not covered by 10 CFR 50.54 or 10 CFR 50.59 may be evaluated using the CCEF. The form should be completed in its entirety, approved by the responsible supervisor and forwarded to site Licensing. The completed CCEF documents the rationale for the commitment change decision and requirement to notify the NRC if applicable.

PART II

Commitment changes that are not within the scope of 10 CFR 50.59 or 10 CFR 50.54 still need to be evaluated in terms of their safety significance, unless the NRC has approved the proposed commitment change. Changes to the facility not captured by 10 CFR 50.54 or 10 CFR 50.59 clearly have the potential for altering the design, operation, function, or ability of a structure, system, or component (SSC) to perform its intended safety function. Attachment 9.3 (Safety Significance Assessment Decision Step 2) outlines a deterministically based approach for conducting safety assessments. The process is briefly described below:

The first step is to evaluate if the change could negatively impact the ability of an SSC to perform its intended safety function. Relevant information in performing this evaluation is an understanding of the safety basis for the original commitment. A review of pertinent documentation (e.g., NRC Bulletin or Generic Letter, LER, NOV, etc.) that prompted the original commitment is a source for basis information. Another factor to be considered in performing the evaluation is whether the change could negatively impact the ability of plant personnel to ensure the SSC is capable of performing its specified safety function as a result of changes to procedures, programs and other human performance elements. If the assessment determines that the change could not negatively impact the ability of a SSC to perform its intended safety function, the change is not safety significant.

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ATTACHMENT 9.5 ----- COMMITMENT CHANGE EVALUATION PROCESS GUIDELINES
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If the evaluation determines that the change could negatively impact the ability of a SSC to perform its intended safety function, then an assessment applying the criteria of 10 CFR 50.92 should be performed to determine if the change is significant to safety. Probabilistic Safety Assessment (PSA) insights can be used to supplement deterministic-based assessments. If the assessment determines that a significant hazards consideration exists, the change is significant to safety. Otherwise, the change is not safety significant.

If the answer to any question in Part II of the CCEF is “Yes,” then the change is significant to safety. Otherwise, the change is not safety significant.

In the analysis for safety significance, consider the following issues: safety function, safety analysis, operability profile, interaction with other equipment, reliability, maintenance, design, qualification, fabrication and materials, failure modes, procurement and personnel interface.

When answering “Does the revised commitment involve a significant increase in the probability or consequences of an accident previously evaluated?,” consider the following:


Either identify the limiting accidents potentially affected by the revised commitment or state that no design basis accidents are affected or the change does not directly affect any material condition of the plant that could directly contribute to causing or mitigating the effects of an accident. Compare the current probability and consequences of each limiting accident to the probability and consequences of which would exist if the proposed change were in effect. Justify any significant differences in probability or consequences by discussing either why the differences are unimportant or how they are compensated for by other proposed change provisions.

When answering, “Does the revised commitment create the possibility of a new or different kind of accident from any accident previously evaluated?,” consider the following:

Demonstrate that the proposed change will not alter operation of the plant or the manner in which it is operated or state that no new system or design changes are being implemented. Assess the impact of the change and/or failure modes associated with the change, to determine if the impact has modified the plant response to the point where it can be considered a new accident. Determine if the failure modes associated with the change represent a new unanalyzed accident. Determine if the change, or a failure mode associated with the change, increases the probability of an accident to the point where it should be considered within the design basis.

When answering “Does the revised commitment involve a significant reduction in a margin of safety?,” consider the following:

A reduction in margin of safety is generally related to boundary performance. Therefore, it is first necessary to identify the safety margins affected by the proposed change or state that no adverse impact on the protective boundaries, safety limits or margin to safety exists. Compare the current safety margins to the safety margins which would exist if the proposed change were in effect. Justify any significant differences by discussing either why the differences are unimportant or how they are compensated for by other proposed change provisions.

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PART III


Non-compliances with obligations are identified to licensees through notices of violation (NOVs) and non-cited violations. Additionally, Entergy may have made specific commitments related to the method of complying with obligations. Changes to these commitments need to be evaluated to determine if the change would still preserve compliance with the obligation. Responses to NOVs and some LERs include the immediate corrective actions taken to restore compliance with the obligation. Historically, these corrective actions (e.g. one-time recurring, etc.), which typically prescribed the method(s) of complying with obligations, may have been tracked as commitments. However, the compensatory measures or actions in this example, (corrective actions taken in a NOV response or LER) are the licensee’s promise to restore compliance with a violated obligation, usually by a certain date.

Additionally, the NRC must be notified of changes to the date committed to restore compliance with an obligation. If a revision to the regulatory commitment date is necessary and can be justified, and the commitment has not yet been implemented, then notify the NRC prior to the original commitment date. If the revision to the commitment date can not be justified, then either meet the original commitment date or apply for the appropriate regulatory relief. Changes to the associated corrective actions will need to be evaluated to determine if the change would still achieve compliance with the obligation.

If the change to the commitment date preserves compliance, but the original commitment has yet to be implemented, proceed with the change; however, the NRC should be notified of the change as soon as practicable following approval, but before the completion date committed to. Notification may be accomplished by supplementing the docketed correspondence containing the original commitment.

PART IV

Some commitments are made in response to a subject of regulatory interest where the NRC either reviewed and approved the action volunteered or agreed to by the licensee or relied upon the commitment in lieu of taking other action. Items in this category include: (1) specific statements in NRC Safety Evaluation Reports crediting specific licensee commitments as being the basis for a NRC staff safety conclusion (general references to an entire licensee report, such as a Fire Hazards Analysis, are not considered to be specific commitments in this context); (2) commitments made in response to NRC Bulletins and Generic Letters; and (3) commitments made in response to requests for information under 10 CFR 50.54(f) or 10 CFR 2.204; and (4) commitments identified as long term corrective actions in response to a NRC Notice of Violation. Commitments may involve both new actions as well as existing actions credited by licensees in responding to NRC requests. For example, responses to an item in an NRC Bulletin crediting an existing program, practice, or plant feature as meeting the intent of the requested action is a commitment. Changes to commitments not related to categories (1) through (3) would proceed to PART V.

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ATTACHMENT 9.5 ----- COMMITMENT CHANGE EVALUATION PROCESS GUIDELINES

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If the original commitment has yet to be implemented, Site Licensing should determine when the NRC needs to be notified and the method of notification. Typically, Licensing would notify the NRC prior to making the change and determine the need for docketed correspondence. Notification may be accomplished by supplementing the docketed correspondence containing the original commitment.

If the commitment has been implemented, or is a recurring nature, and the change does not require pre-approval by the NRC, Entergy can proceed with the change and notify the NRC via the CCEF summary report.

PART V

Commitments to take long-term corrective actions in Licensee Event Report (LER) are made to minimize recurrence of adverse conditions. A good measure of the effectiveness of these commitments is the success in avoiding recurrent adverse conditions.

The NRC, under its enforcement policy, uses a two-year time period from the date of the last inspection or the period within the last two inspections, whichever is longer, as an indication that the adverse condition related to a particular area has been corrected.

When evaluating the revision or deletion of the commitment, consider the following:

- (1) Did the committed corrective action successfully minimize recurrence of the condition?
- (2) Is there a more effective way to minimize recurrence of the condition other than the method selected?
- (3) Have the conditions at the plant changed since the original commitment making it no longer applicable?
- (4) In hindsight and based on experience, was the commitment necessary to minimize the potential for future non-compliance?
- (5) Has the commitment subsequently been captured as part of an ongoing program or other administrative control that is subject to a revision review process (e.g., procedure changes governed by administrative technical specifications)?

If the changed commitment is necessary to minimize recurrence of an adverse condition, the NRC should be notified of the change via the CCEF summary report.

ATTACHMENT 9.6 -----EXAMPLE OF CMS DATA
Sheet 1 of 1

This example is provided for informational purposes to show the type of data typically entered into the Commitment Management System. The example below is a printout from a Licensing Research System (LRS) database. Other databases, formats, and contents are acceptable.

EXAMPLE

Commitment List Detail
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Commitment	Unit	Source Document	Type	Number	Section	Rev	Date
A-17049	RB	RBF1-10-0155	9/23/2010	Parent 1: RBG	47076		9/23/2010

Keyword List:

Summary


BY 11/30/10, SUBMIT TO THE NRC A SUPPLEMENT OF THE RBG CYBER SECURITY PLAN CLARIFYING THE BALANCE-OF-PLANT SSCS THAT WILL BE INCLUDED IN THE SCOPE OF THE CYBER SECURITY PROGRAM.

Originated Date:	Priority:	Name	Department
9/23/2010	HARD	Jane Engineer	Eng
Scheduled Complete Date: 11/30/2010	NRC Submittal: Y	Support Person: Fred Engineer	Eng
Closure Date: 11/30/2010	Agency: NRC	Licensing Lead: Joe Licensing	LIC
Status: CLOSED	Mode:		

Related Documents for A-17049

Relationship	Doc Type	Doc Number	Doc Section	Doc Revision	Doc Date
CLOSURE	RBG	47087			11/30/2010
PARENT	RBG	47076			9/23/2010

Text	Comments	Current Status
PER RBG-47076, DATED 9/23/10; RIVER BEND MADE THE FOLLOWING ONE-TIME-ACTION COMMITMENT: "ENTERGY WILL SUPPLEMENT THE RBG CYBER SECURITY PLAN SUBMITTAL TO CLARIFY THE SCOPE OF SYSTEMS DESCRIBED IN SECTION 2.1, "SCOPE AND PURPOSE" TO CLARIFY THE BALANCE-OF-PLANT SSCS THAT WILL BE INCLUDED IN THE SCOPE OF THE CYBER SECURITY PROGRAM."	11/30/10; PER RBG-47087 (RBF1-10-0177), THE SUPPLEMENT WAS ISSUED DATED TODAY. THIS ACTION IS COMPLETE. [WJF]	

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ATTACHMENT 9.7 ----- CCEF SUMMARY REPORT FORMAT

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(Typical)

(Insert plant name)
(Insert reporting period)
COMMITMENT CHANGE SUMMARY REPORT

COMMITMENT NUMBER	DATE OF ORIGINAL COMMITMENT	CHANGED DATE	DESCRIPTION
			Original text: (Insert text of original commitment verbatim) Revised text: (Insert text of revised commitment) Summary of justification: (Provide a summary of the change justification)