



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

February 7, 2013

Mr. Michael D. Skaggs
Senior Vice President
Nuclear Construction
Tennessee Valley Authority
Lookout Place 6A
1101 Market Street
Chattanooga, TN 37402-2801

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
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SUBJECT WATTS BAR NUCLEAR PLANT, UNITS 1 AND 2 – AUDIT OF THE
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NOS. ME9613 AND ME9614)

Dear Mr. Skaggs and Mr. Shea:

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 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 regulatory commitments are being effectively implemented.

An audit of Watts Bar Nuclear Plant's (WBN's) commitment management program was performed at the WBN site and the corporate office in Chattanooga, Tennessee during the period November 5 - 9, 2012. The NRC staff concludes, based on the audit, that (1) WBN has

- 2 -

implemented NRC commitments on a timely basis, and (2) has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Poole', with a large loop at the beginning and a horizontal line at the end.

Justin C. Poole, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-390 and 50-391

Enclosure: Audit Report

cc: Listserv

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

WATTS BAR NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-390 AND 50-391

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 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. 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.

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 regulatory commitments are being effectively implemented. An audit of the Watts Bar Nuclear Plant (WBN) commitment management program was performed at the WBN site and corporate office in Chattanooga, Tennessee during the period November 5 – 9, 2012. The audit reviewed commitments made since the previous audit on October 21, 2009.

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, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.).

2.0 AUDIT PROCEDURE AND RESULTS

The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, (2) verification of the licensee's program for managing changes to NRC commitments and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

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. The audit also verifies that the licensee's commitment management system includes 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.

2.1.1 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, etc.) or licensing activities (bulletins, generic letters, etc.). 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. Before the audit, the NRC staff searched Agencywide Document Access and Management System 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 attached Audit Summary provides details of the audit and its results.

The NRC staff sampled 76 commitments between the two units and all sampled commitments were identified in the licensee's commitment tracking system.

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. Since the previous audit conducted in October 2009, the process used at WBN changed from Standard Programs and Processes (SPP) 3.3, "NRC Commitment Management," which the staff found to have requirements consistent with the guidance contained in NEI 99-04, to Nuclear Power Group Standard Programs and Processes

(NPG-SPP) 3.3 "NRC Commitment Management." As part of this audit, the NRC staff reviewed the differences between the two procedures. The audit also reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. In addition, the NRC staff reviewed the self-assessments (Numbers CRP-LIC-F09-002 and CRP-LIC-S-12-002) of the implementation effectiveness of NPG-SPP 3.3 by TVA Nuclear Power Group (Corporate) Licensing in April 2009 and September 2012.

2.2.1 Audit Results

The attached Audit Summary also provides details of this portion of the audit and its results.

The NRC staff found one example where TVA had provided the necessary information to the staff and stated that the commitment was considered closed but during the audit, it was found to be open in licensee's commitment tracking system. When informed, TVA staff corrected the error. The NRC staff has no further questions regarding this item. The NRC staff found that NPG-SPP 3.3 requirements are consistent with the guidance contained in NEI 99-04.

2.3 Review to Identify Misapplied Commitments

The commitments reviewed for this audit were also evaluated to determine if they had been misapplied. A commitment is considered to be misapplied if the action comprising the commitment was relied on by the NRC staff in making a regulatory decision such as a finding of public health and safety in an NRC safety evaluation associated with a licensing action. Reliance on an action to support a regulatory decision must be elevated from a regulatory commitment to a legal obligation (e.g., license condition, condition of a relief request, regulatory exemption limitation or condition). A commitment is also considered to have been misapplied if the commitment involves actions that were safety significant (i.e., commitments used to ensure safety).

Each of the commitments selected for the audit sample were reviewed to determine if any had been misapplied. None of the commitments selected for the audit sample were determined to be misapplied.

2.3.1 Review of Safety Evaluation Reports for Licensing Actions since the Last Audit to Determine if They Are Properly Captured as Commitments or Obligations

In addition to the commitments selected for the audit sample, all license amendment, exemption and relief request safety evaluations that have been issued for WBN since the last audit were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above. The evaluation concluded that none of these documents contained any misapplied commitments.

3.0 CONCLUSION

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

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Geoff Cook – TVA Corporate Licensing
Criss Riedl – TVA Corporate Licensing
Donna Guinn – Watts Bar Unit 1 Licensing
Rusty Stroud – Watts Bar Unit 1 Licensing
Beverly Duckett – Watts Bar Unit 1 Licensing
Gordon Arent – Watts Bar Unit 2 Licensing
Tommy Elton – Watts Bar Unit 2 Licensing

Principal Contributors: Andrew Hon
Justin Poole

Date: February 7, 2013

Attachment: Summary of Audit Results

AUDIT SUMMARY

IMPLEMENTATION OF COMMITMENTS:

The following commitment samples were reviewed:

Description	Licensee No.	ADAMS Reference	Comments
Unit 1			
Full compliance with 10CFR73.55(i)(4)(A)-(D), 10CFR73.55(e)(1)(C) and 10CFR73.55(i)(3)(vii) for WBN by September 24, 2012.	10293031	ML093160116	This was closed upon the installation of a new remote monitoring system, a new access control system and a new uninterruptible power supply by September 21, 2012.
Revise UFSAR Section 5.2.1.5 and Table 5.2-2 to prohibit the performance of a turbine roll test or a hydrostatic test transient.	111952889	ML080420477	This was closed upon UFSAR Amendment 9 submitted to NRC on November 21, 2011. In addition, site procedure 1-SI-8 was updated to include the changes.
Issue and initially perform a procedure for a semi-annual inspection of the compensatory measure for flood protection of the WBN-1 Thermal Barrier Booster pump and motors by August 31, 2012.	113636603	ML12171A053	This was closed upon procedures issued and performed by August 30, 2012.
Issue and initially perform a procedure for a semi-annual inspection of the temporary HESCO flood barriers installed at four dams by August 31, 2012.	113637349	ML12171A053	This was closed upon procedures issued and performed by August 29, 2012.
Submitting a LAR to update WBN-1 UFSAR – hydrology.	113636334	ML12171A053	This was closed upon TVA submittal of the LAR on July 19, 2012.
Administrative commitment - Implement Design Change to remove Min-K insulation during the Fall 2012 Refueling Outage.	113194918		This was closed upon the Design Change Package closure after the Refueling Outage in October 2012.

<p>Administrative commitment - Implement Design Change to replace RHR sump strainer plenum cover plate with larger orifice size during the Fall 2012 Refueling Outage.</p>	<p>113194886</p>		<p>This was closed upon the Design Change Package closure after the Refueling Outage in October 2012.</p>
<p>Administrative commitment to industry's Ground Water Protection Initiative (NEI 07-07) identified actions to improve TVA's management and response to the inadvertent release of radioactive substances. These releases may result in low but detectable levels of plant-related material in subsurface soils and water.</p>	<p>112576642</p>		<p>This was closed upon WBN Chemistry identified four procedures that implemented WBN's Ground Water Protection Program on September 23, 2011.</p>
<p>Submit WBN fire protection report with rev bars by July 1, 2012.</p>	<p>112946586</p>	<p>ML11329A089</p>	<p>This was changed by a letter dated March 13, 2012.</p>
<p>Technical Specification (TS) Change – Main Control Room Chiller Completion Time Extension one time during the replacement of MCR chillers during March 1, 2011 and April 30, 2012. TVA committed four compensatory actions during the replacement of the MCR chillers to minimize the probability of total loss of capability.</p>	<p>112071014</p>	<p>ML100570414</p>	<p>This commitment was cancelled on May 13, 2012, by WBN site because the chiller replacement was deferred until required parts could be procured. Corporate Licensing decided to resubmit LAR at a later date when the new replacement schedule is finalized by the site. Since the condition for the commitment was not materialized during the specified period, a notification of the change was determined to be not applicable.</p>

Unit 2			
Submittal of Fire Protection Report (FPR) by December 17, 2010	111331309	ML101970311	This was closed upon submittal of letter dated December 18, 2010.
Provide markup, description, and justification of changes made to the FPR since NRC approval by August 30, 2010.	111331313	ML101970311	This was closed upon submittal of letter dated August 30, 2010.
Submit portions of FPR not affected by operation of Unit 2 by August 6, 2010.	111331314	ML101970311	This was closed upon submittal of letter dated August 9, 2010.
Provide a description of how safe shutdown is ensured for each Multiple Spurious Operation scenario by August 20, 2010.	111331316	ML101970311	This was closed upon submittal of letter dated August 20, 2010. This letter opened up two additional commitments (TVA 111905993 and 111905994) which remain open.
Provide the baseline list of operator manual actions by August 6, 2010.	111331318	ML101970311	This was closed upon submittal of letter dated August 9, 2010.
TVA will provide the NRC with the latest revised information to the Radiological Emergency Plan (REP). If changes are made after NRC review of the plan, TVA will provide updates of all changes made to the WBN Unit 1/2.	111032952	ML101230264	This remains open due to the last part of the commitment. TVA has submitted, and staff has reviewed the REP, but a final version will be sent in just prior to fuel load activating the plan for dual unit operation.
REP – calculations verified and submitted.	111032960	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP – revise bases to reflect the correct threshold value.	111032968	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP – revise the language to clarify on the intent of the	111032975	ML101230264	This was closed upon submittal of letter

threshold.			dated October 11, 2010.
REP–TVA will evaluate adding information to the basis for the applicable Initiating Condition (IC).	111032992	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA will correct the example designators to be dual unit specific.	1110333001	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA will remove designators (Units 1 & 2 and Unit 1 or 2) for Additional Equipment Building, CST, and RWST.	111033009	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA will remove designators (Units 1 & 2 and Unit 1 or 2) for reactor building.	111033029	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA will provide the NRC staff with an updated classification scheme that reflects these changes for WBN Unit 2.	111033038	ML101230264	Listed as OPEN in the database but in reviewing the letter dated October 11, 2010, the information was provided and TVA stated that the item was closed. TVA missed updating their database. TVA reviewed the documents, agreed the commitment should be closed, and updated the database.
REP–TVA will remove designators (Units 1 & 2 and Unit 1 or 2).	111033050	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA will revise IC 6.2.A and 6.2.U to be consistent with the Mode 1–4 ICs.	111033057	ML101230264	This was closed upon submittal of letter dated October 11, 2010.
REP–TVA agrees to revise specific wording.	111033068	ML101230264	This was closed upon submittal of letter dated October 11, 2010.

REP – (a) Plant data displays will be updated as necessary to include WBN Unit 2. (b) TVA will update dose assessment models to provide capabilities for assessing releases from both units. (c) TVA will review needed assessment capability to ensure strategies and guidance reflect the addition of WBN Unit 2.	111033086	ML101230264	This item remains Open due to parts (b) and (c) of the commitment. Part (a) has been completed.
TVA commits to incorporate the instrumentation setpoint methodology that is consistent with WBN Unit 2 Licensing Bases into the WBN Unit 2 FSAR no later than Amendment 100.	111017593	ML101450242	This was closed based on the information being provided in Amendment 100 on September 1, 2010.
Amendment 101 to the Unit 2 FSAR will implement changes as noted.	111364245	ML102510580	This was closed based on the information being provided in Amendment 101 on October 29, 2010.
Calculation WCG-1-2010 will be revised to include the Unit 2 Polar Crane as a Single Failure Proof Equivalent per Chapter 3 of NEI 08-05 by October 29, 2010.	111880118	ML102510580	This was closed based on a revision to the stated calculation to include WBN Unit 2.
The new Unit 2 FSAR Section 3.12 will be submitted to the NRC by November 24, 2010.	111364253	ML102510580	This was closed based on the information being provided in Amendment 103 on March 15, 2011.
Individual Plant Examination (IPE) – TVA will respond to NRC Request for Additional Information (RAI) 14 by October 29, 2010.	111332410	ML102280585	This was closed based on the information being provided in letter dated January 31, 2011.
IPE – Prior to fuel load, TVA will revise 125V DC system top to correctly model board failure	111626075	ML102280585	This remains Open.
IPE – Prior to fuel load, TVA will perform a full review of the database after all model changes to address findings are	111626093	ML102280585	This remains Open.

complete			
IPE – Prior to fuel load, TVA will update the database to address CDE 650 and 651.	111626105	ML102280585	This remains Open.
IPE – Prior to fuel load, TVA will update the type codes for the motor driven auxiliary feedwater pumps.	111626113	ML102280585	This remains Open.
IPE – Prior to fuel load, TVA will fully resolve F&O 4-3.	111626120	ML102280585	This remains Open.
TVA will change the current Unit 2 clevis insert bolts to the latest design, which uses an X-750 alloy prior to Unit 2 operation.	111889786	ML101790399	This commitment was closed based on TVA's withdrawal of the commitment. TVA withdrew the commitment by letter dated April 21, 2011, ML111110513. The NRC staff asked follow-up RAIs based on this withdrawal and will revise its Safety Evaluation Report in the next supplement.
Amendment 102 will include a revised discussion in Section 9.2.2.4.	111761551	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will remove historical "Unit 1 Only Operation" statements.	111761556	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will revise Section 9.2.2.4 to be consistent with Section 9.2.2.2.	111761560	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will revise Section 9.2.2 to better describe the CCS alignment for dual unit operation.	111761566	ML103480692	This was closed based on the information being provided in Amendment 102 on

			December 17, 2010.
TVA will revise response procedures (ES-1.3, "Transfer to Containment Sump") to specify clear criteria for taking actions from the control room.	111902242	ML103480692	This item remains Open as the procedure has not yet be updated.
TVA will revise the System 67 System Description and applicable procedures to accomplish the above activities.	111902277	ML103480692	This item remains Open.
Amendment 102 will revise Section 10.4.9.2 to remove the discussion regarding General Design Criteria 5.	111761573	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will revise Table 10.4.6.	111761581	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will revise Section 10.4.9.3	111761614	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will add a test requirement to Table 14.2-1, Sheet 13.	111761623	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 102 will revise Table 15.5-14.	111761634	ML103480692	This was closed based on the information being provided in Amendment 102 on December 17, 2010.
Amendment 103 will update values in the FSAR.	111762411	ML103480692	This was closed based on the information being provided in Amendment 103 on March 15, 2011.
Non-proprietary version of Enclosure 4 to this letter will be	111902413	ML103480692	This was closed based on the

provided two weeks after receipt from Westinghouse.			information provided in letter dated June 27, 2012.
Future amendment to the Unit 2 FSAR will correct titles for the X axes on Chapter 15 tables	111637074	ML103200144	This was closed based on the information being provided in Amendment 103 on March 15, 2011.
Future amendment to the Unit 2 FSAR will provide legible version of Figure 15.2-11.	111637079	ML103200144	This was closed based on the information being provided in Amendment 103 on March 15, 2011.
TVA will make editorial corrections in a future amendment to the Unit 2 FSAR in Chapter 3.	111637090	ML103200144	This was closed based on the information being provided in Amendment 101 on October 29, 2010.
Future amendment to the Unit 2 FSAR will remove reference to Code Case 1423-2.	111637092	ML103200144	This was closed based on the information being provided in Amendment 101 on October 29, 2010.
FPR will be provided by March 16, 2011 except for Part V which will be provided by April 29, 2011.	112068454 112068464	ML110770448	This commitment was tracked by 2 items in TVA's database. The first for submitting all but Part V by March 16, 2011. The second for providing Part V by April 29, 2011. Both of these items were closed based on the information being submitted to the staff on March 16, 2011 and May 18, 2011.
Provide January 14, 2011 version of the FPR with revision bars. Justifications for changes not directly related to Unit 2 operation will be provided.	112068476	ML110770448	This was closed based on the information provided in letter dated March 31, 2011.

Provide digital copy of Revision 41 to the FPR.	112068495	ML110770448	This was closed based on the information provided in letter dated March 16, 2011.
TVA will provide side-by-side comparison between January 14, 2011 version of the FPR and the one to be submitted on March 16, 2011.	112068507	ML110770448	This was closed based on the information provided in letter dated March 16, 2011.
Provide updated Figures II-1A thru II-26A by March 16, 2011.	112068520	ML110770448	This was closed based on the information provided in letter dated March 16, 2011.
Figures representing the as-constructed plant configuration will be provided after construction completion.	112068531	ML110770448	This item remains open as construction is not yet complete.
Response to RAI FPR V-1 will be provided by March 25, 2011.	112068537	ML110770448	This was closed based on the information provided in letter dated March 31, 2011.
Response to RAI FPR V-2 will be provided by April 29, 2011.	112068570	ML110770448	This was closed based on the information provided in letter dated July 1, 2011.
After performing final walkdowns as prescribed in the FPR, TVA will submit the results to the NRC.	112068578	ML110770448	This item remains open as construction is ongoing and the walkdowns have not occurred.
The requirement for a portable lantern will be evaluated during the Unit 2 walkdowns of operator manual actions.	112068588	ML110770448	This was closed based on the information provided in letter dated May 18, 2011.
The FPR will be revised to clarify which Modes of operation a reduction specified in RAI FPR II-8 is applicable to.	112068737	ML110770448	This was closed based on the information provided in letter dated May 18, 2011.
Barriers separating the Unit 2 Reactor Building from the Refueling Floor will be configured and controlled the	112068748	ML110770448	This item remains open.

<p>same as Unit 1 Reactor Building Equipment Hatch.</p>			
<p>TVA will issue the as-constructed FPR for Units 1 and 2 by October 1, 2011.</p>	<p>111903011</p>	<p>ML103570374</p>	<p>TVA first revised this commitment in a letter dated August 15, 2011, which stated a new due date of July 1, 2012. This commitment was then closed when a letter dated March 13, 2012, stated that the schedule for the as-constructed FPR would be sent to the NRC when it was available (TVA 113315590). TVA then closed this commitment to a new commitment made in letter dated April 26, 2012 (TVA 113461862) saying that the as-constructed would be submitted to the NRC no later than October 15, 2014.</p>
<p>If the FPR re-analysis determines that any other fire areas are affected, TVA will submit the necessary revisions by February 28, 2011.</p>	<p>111903056</p>	<p>ML103570374</p>	<p>This was closed based on the information provided in letter dated March 16, 2011.</p>
<p>TVA will fix the administrative errors in the FPR and re-submit Parts V and VI by January 14, 2011.</p>	<p>111831467</p>	<p>ML103570374</p>	<p>This was closed based on the information provided in letter dated January 14, 2011.</p>
<p>An Owners Summary Report shall be issued within 90 days following Unit 2 commercial operation for those repairs or replacements, if any, which were performed under Section XI on Unit 2 prior to commercial operation.</p>	<p>112047866</p>	<p>ML102850246</p>	<p>TVA closed this commitment and opened three new commitments (TVA 112687714, 112687720, and 112687727) based on a letter dated</p>

			September 1, 2011. All three of these appropriately remain open.
TVA will report the results of the hydrology analysis without use of sand baskets or the seismic test of sand baskets to the NRC by October 31, 2011.	112179285	ML11112A137	This item was closed based on the information in letter dated October 31, 2011. This letter created a new commitment (TVA 112870791) to update the FSAR, which was closed based on submittal of Amendment 107.
TVA will provide an update of the WBN 2 FSAR to describe the long-term stability analysis methodology following the completion of the finite element analyses by August 31, 2012.	112179286	ML11112A137	This item was closed based on the information in letter dated September 6, 2012. This letter created a new commitment (TVA 113880166) stating that TVA will design and implement modifications for Cherokee and Douglas Dams prior to WBN 2 startup. This commitment remains open.
TVA will continue to inspect and maintain the baskets as required until the implementation of the permanent solution at all four dams.	112179287	ML11112A137	This item remains open.
TVA will provide an update describing the increased height at Fort Loudoun, Cherokee, Watts Bar, and Tellico dams as the current licensing basis for WBN 2 in Amendment 104.	112179288	ML11112A137	This was closed based on the information being provided in Amendment 104 on June 3, 2011.

implemented NRC commitments on a timely basis, and (2) has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

/RA/

Justin C. Poole, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-390 and 50-391

Enclosure: Audit Report

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