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

July 3, 2013

Mr. Louis P. Cortopassi
Site Vice President and Chief Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
9610 Power Lane, Mail Stop FC-2-4
Omaha, NE 68008

SUBJECT: FORT CALHOUN STATION, UNIT NO. 1 – AUDIT OF LICENSEE REGULATORY COMMITMENT MANAGEMENT PROGRAM (TAC NO. MF0598)

Dear Mr. Cortopassi:

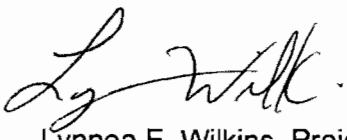
In the U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21,2000, the NRC informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing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

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04 and that the regulatory commitments are being effectively implemented.

An audit of the Fort Calhoun Station, Unit No. 1 (FCS) commitment management program was performed at plant site February 25 – March 1 and March 11-15, 2013. The NRC staff concludes, based on the audit, that Omaha Public Power District (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing current and future NRC commitment changes at FCS. It is recommended that the licensee and the NRC meet to discuss how Safety Enhancement Program items are handled. The details of the results of the audit are described set forth in the enclosed audit report. This audit closes item 6.b of the Confirmatory Action Letter Restart Checklist (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13057A287).

If you have any questions, please contact me at 301-415-1377 or via e-mail at Lynnea.Wilkins@nrc.gov.

Sincerely,



Lynnea E. Wilkins, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

Enclosure:
As stated

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

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

OMAHA PUBLIC POWER DISTRICT

FORT CALHOUN STATION, UNIT NO. 1

DOCKET NO. 50-285

1.0 INTRODUCTION AND BACKGROUND

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

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the commitments are being effectively implemented.

NEI 99-04 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and licensing activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Fort Calhoun Station, No. 1 (FCS), commitment management program was performed at plant site February 25 – March 1 and March 11-15, 2013. The audit reviewed commitments made by Omaha Public Power District (OPPD, the licensee) during the lifetime of operation since the previous audit on September 29-30, 2010, which was documented in an audit report dated December 3, 2010 (ADAMS Accession No. ML103200651). The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC

commitments that have been completed and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, relief requests, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff performed a search in ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification.

The audit excluded the following types of commitments that are internal to licensee processes:

(1) Commitments made on the licensee's own initiative among internal organizational components.

(2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.

(3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

The NRC staff reviewed three licensee procedures related to the Commitment Tracking Program:

- NOD-QP-23, "Commitment Tracking,"
- NOD-QP-33, "Signature and Commitment Authority," and
- NOD-QP-34, "Ongoing Commitment Program."

NOD-QP-23 is the primary procedure for the handling of regulatory commitments. The procedure also allows for processing of internally identified action items associated with other correspondence or management request. This procedure establishes a defined methodology for the assignment, tracking, revision, and closing of commitment tasks.

As stated in NOD-QP-23, the licensee defines "Regulatory Commitments" as:

> An explicit statement to take a specific action agreed to or volunteered by OPPD that has been submitted on the docket to the NRC by designated management personnel in writing.

NOD-QP-33 provides guidance for determining who defines regulatory commitments, who is authorized to make regulatory commitments, and who can sign correspondence to the NRC.

The licensee started a Commitment Tracking System (CTS) in the 1987/1988 time frame. This system was later renamed to the Commitment Action Tracking System (CATS). In August 1998, CATS was superseded by the Resource Asset Management System (RAMS). RAMS is a software program that contains numerous modules of which one is the regulatory commitment tracking. In February 2010, RAMS was upgraded to Asset Suite. Asset Suite is a program and process that identifies and tracks both commitments and the action items required to fulfill that commitment.

Upon identification of an obligation or commitment, the Licensing Engineer shall follow the procedures as stated in NOD-QP-23 to initiate the tracking process. As stated above, the licensee tracks regulatory commitments made to the NRC in the same program as internally generated action items such as fulfilling implementation dates of amendments, responding to NRC Requests for Additional information and responses to Licensee Event Reports. NEI 99-04 recognizes that licensees routinely track a variety of commitments.

The licensee performed a self-assessment of its commitment management program in March 2009. The licensee's self-assessment did not identify any missed regulatory commitments and made no recommendations for management consideration.

2.1.2 Audit Results

The NRC staff examined 25 commitments made by the licensee during the lifetime of the plant. The NRC staff reviewed a sample of selected commitments which were generally being effectively implemented or were being captured in the licensee's commitment management program. The NRC staff also reviewed reports generated by the tracking program, Asset Suite, for the commitments listed in the attached Table to evaluate the status of completion. Using Asset Suite, the NRC staff was able to verify that the licensee could track when the commitment was made, its implementation status, and where the implementing documents could be found, including applicable procedures or submittals to the NRC. The licensee was also able to readily produce the documents referenced in Asset Suite confirming when the licensee made the commitment, when the NRC acknowledged the commitment, and the status of the commitment including when the commitment was closed, modified, or deleted.

During the audit, the NRC staff requested documentation regarding a commitment made on December 13, 2012. The licensee discovered that the commitment had not been captured in Asset Suite and was not being tracked. The licensee also discovered that an incorrect tracking number (AR No.) was cited in the letter to NRC. The licensee recognized the error, created a Condition Report (CR) to document the error and added the commitment in Asset Suite to track

progress of the commitment. The licensee stated that this was a one-time error due to heavy workload. Additionally, the preventative maintenance (PM) work order portion of the commitment was being tracked in the licensee's corrective action program by CR2012-05070-007; therefore, the tracking of the commitment had not been completely overlooked and the actions of the commitment were in progress. The NRC staff does not see this as an indication of generic implications within the commitment management program.

The NRC staff reviewed the licensee's procedures against the guidance in NEI 99-04 and concluded that the procedures follow the guidance and is, therefore, acceptable.

In addition, Asset Suite is compliant with NEI 99-04 in that it serves as an internal process to control commitments as recommended by NEI 99-04. Asset Suite appeared to be an effective tool to manage the commitment actions allowing the licensee to be able to provide detailed printouts of the status of audited items. The attached Audit Summary provides details of the audit and its results.

Based on the above, the NRC staff found that the licensee's commitment tracking program had adequately captured all of the audited regulatory commitments, except for the commitment mentioned above.

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 as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determined whether they have been captured in an effective program for future implementation.

2.2.1 Audit Scope

The NRC staff examined commitments made by the licensee during the lifetime of the plant. The NRC staff compared the licensee's process for controlling changes to regulatory commitments contained in NOD-QP-34. The NRC audit reviewed a sample of commitment changes to verify that the licensee's commitment management system includes proper notification to the NRC and methods 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.

As previously stated, changing a commitment is discussed in the licensee's procedures entitled, "NOD-QP-23" and "NOD-QP-34." NOD-QP-23 states that "Ongoing Commitments" should be handled in accordance with NOD-QP-34. NOD-QP-34 provides details for making changes to or deviating from an "Ongoing Commitment." Attachment 1, "Ongoing Commitment Review Form," and Figure 3-1, "Commitment Management Change Process," provide the details for changing a commitment. NOD-QP-34 follows the guidance contained in NEI 99-04.

2.2.1 Audit Results

Attachment 1, "Ongoing Commitment Review Form" in NOD-QP-34 is identical to Figure A-3, "Commitment Evaluation Summary," in NEI 99-04. In addition, the licensee's Figure 3-1 of NOD-QP-34, "Commitment Management Change Process," is identical to the Commitment Management Process provided by NEI 99-04. The NRC staff reviewed a sample of changes reported to the NRC in writing, on the docket. Licensee personnel were able to effectively track commitments through the licensee's system through implementing documents. The attached Audit Summary table provides details of this portion of the audit and its results.

Based on the above, the NRC staff concludes that the licensee's program for managing NRC commitments adequately follows the NEI 99-04 guidelines for commitment tracking, commitment changes, and reporting requirements and is, therefore, acceptable.

The NRC staff also performed a commitment audit on the Safety Enhancement program (SEP). By letter dated December 9, 1988, the licensee submitted its SEP, which consolidates "the concerns which led to Fort Calhoun Station being placed on the list of plants requiring additional NRC attention...." By letter dated November 6, 1989, the licensee clarified which commitments were living commitments (to be institutionalized for the life of the plant) and which were one-time commitments (have corrective actions in place to prevent reoccurrence). By letter dated April 28, 1989, and as documented in procedure NPM 2.02, "Safety Enhancement Program," the licensee stated:

> These items shall not be changed once established per the SEP unless the change is deemed an improvement as determined by personnel designated by the Senior Vice President. The NRC will be periodically informed of changes made.

In addition, procedure NOD-QP-28 was created to establish instructions for the control of OPPD's Safety Enhancement Program. This procedure was deleted in 2004. The licensee's justification for deletion is:

> All actions tracked by the Safety Enhancement Program (SEP) are complete and closed. Continuing actions established by the SEP, as referenced in Attachment 1, are now tracked by the Ongoing Commitment Program, NOD-QP-34. Therefore, NOD-QP-28 is no longer needed.

The NRC staff asked the licensee what, if any, documents or guidance clearly delineates what personnel are authorized to modify SEP items. The licensee provided the NRC staff with the approval of NPM 2.02, Revision 2, approved in 2005 by the Vice President. This revision deleted references to NOD-QP-28. This indirectly designated authorization to Nuclear Licensing to make changes to the SEP via the use of NOD-QP-23. During the audit, the licensee also created a CR to address the concern that authorization for changing SEP items should be clearer in NPM 2.02 and NOD-QP-33.

NEI 99-04 identifies items that should be categorized as regulatory commitments or items that would be better classified in another program. Part III states:

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

3.2 Is the commitment date necessary and justified?

Although SEP items are not directly in response to a notice of violation (NOV) or licensee event report (LER), the program was developed to prevent reoccurrence of actions/behaviors that landed FCS on the concerned plants list. In addition, the NRC raised a question concerning the belief that the "living" SEP items would be maintained throughout the lifetime of the plant.

The licensee responded:

> Many SEP commitments are unnecessarily detailed and by current standards would be considered enhancements rather than corrective actions. As such, these items would not be considered commitments.

As an observation, the NRC questions the adequacy of the licensee's ability to adequately modify commitments created prior to the creation of the NEI 99-04 guidance; specifically the management of SEP items. The NRC staff communicated this observation with the licensee who stated that a conversation with upper management and the NRC will be held to determine how SEP items should be currently handled and maintained. The SEP items audited are also captured in other areas, such as procedures and the quality assurance plan which are available for NRC review and inspection.

3.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee (1) has implemented NRC commitments on a timely basis and (2) has implemented an effective program to manage current and future regulatory commitments and regulatory commitment changes in accordance with NEI 99-04. It is recommended that the licensee and the NRC meet to discuss how SEP items are handled.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Michael Edwards

Principal Contributor: L. Wilkins

Date:

Attachment:
Audit Summary Table

TABLE 1
Audit Summary: Written Commitments and Related Information
Omaha Public Power District (OPPD)
Fort Calhoun Station, Unit 1
Docket No. 50-285

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
1.	Safety Enhancement Program (SEP) OPPD letters dated: December 9, 1988 April 28, 1989 November 6, 1989 (designated one-time commitments or living commitments (intended for the life of the plant). The commitment listed here are living/ongoing commitments.		AR 13505	SEP 2 – Initiate training to encourage problem reporting by coaching and counseling, use of performance indicators, feedback, and tracking	Ongoing
2.			AR 13509	SEP 4 - Develop plant and system level design bases documents for safety systems and other selected systems.	Ongoing – Procedures were created and continue to be maintained.
3.			AR 14787	SEP 10 – Trending and Root Cause Analysis Project: Complete the implementation of trending and root cause analysis program by completing policies, procedures, and training.	Complete and deleted – The licensee stated that the items in SEP 10 are incorporated into the Quality Assurance Plan; are available for NRC review through Inspection Procedure 71153, "Problem Identification and Resolution inspections;" and the Nuclear Safety Review Group has been established.
4.			AR 14040	SEP 15 - Increase HPES [human performance enhancement system] & IR [incident response] accountability through use of performance indicators (PIs) including performance of subordinates as an accountability in supervisory performance appraisals.	Partially deleted and reported via letter dated June 18, 2012 (ADAMS Accession No. ML12226A171).

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
5			AR 14052	SEP 20 – Evaluate, improve depth and strengthen quality audit and surveillance program.	Ongoing – Programs were created and continue to be maintained. The adequacy of implementation of these programs is covered under quality assurance inspections.
6.			AR 14056	SEP 21 – Develop and conduct a Safety System Functional Inspection (SSFI).	Deleted – The licensee stated that the original commitment was to conduct SSFI's upon completion of the design basis documents (DBDs) to verify that the systems performed and were maintained consistent with the design basis. The licensee concluded that this intent was completed long ago and that this commitment has been completed. [1]

1. Licensee's additional justification:
   a. There have been eight (8) inspections on various systems.
   b. The NRC has performed team inspections on the service water and electrical distribution systems.
   c. Two Updated Safety Analysis Report (USAR) verifications have been performed since making this commitment.
   d. By letter dated February 7, 1997, OPPD further committed to assess all FCS safety-related and safety significant systems.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
7.			AR 14078	SEP 36 – Reduce Corrective Non-Outage Maintenance Backlog. Continue sufficient planning and procurement efforts to maintain the corrective non-outage open maintenance order list below 600.	Ongoing – Standing Order M-101 implements the requirements of SEP 36; however, a Condition Report (CR) was written in 2012 stating that no steps were annotated with the SEP No. to indicate if the commitment was being met. Additionally, the licensee stated that a total of 191 (corrective and elective) non-outage related backlog activities were identified for on-line resolution prior to the April 2001 outage.
8.			AR 14135	SEP 64 – Finalize the 1990 outage modifications list and strengthen management controls.	Implemented and deleted. References to SEP-64 were added to Standing Order (SO) G-21, Modification Control; to SO M-104, Outage Planning and Execution; and to Training Lesson SEAD-21.
9.			AR 14136	SEP 65 – Revise FCS modification control procedures	Implemented via licensee's procedure SO-G-21. The licensee deleted this commitment stating that the requirements were identical to those of SEP 64.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
11.			ARs 30154-02, 30154-04, 30154-08	Develop the Alloy 600 program which reflects the program elements of GALL AMP XI.M11, and other commitments in response to the NRC staff's review. An assessment of Alloy 600 and Alloy 82/182 components has been performed and incorporated into the Alloy 600 program basis document. The assessment provided conclusions and recommendations to address the specified components...These recommendations will be evaluated as part of the Alloy 600 program and implemented as necessary to ensure the reliability of the Alloy 600 and Alloy 82/182 components. The applicant will incorporate appropriate information from its responses to Generic Letter 97-01.	Complete. By letter dated July 5, 2012, the NRC issued, "NRC Post-Approval License Renewal Inspection Report" (ADAMS Accession No. ML12187A068) which closed this commitment.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
12.			AR 31873	OPPD commits to applying recommended or mandated activities resulting from the CRD [Control Rod Drive] Material Reliability Management Plan with regard to management of control element design mechanism (CEDM) housings. OPPD will submit the revised aging management program (AMPs) prior to the period of extended operation to ensure that the revised AMPs are adequate to manage the aging of the CEDM housings.	In progress.
13.			AR 29952-13	Worst-case locations will be evaluated and identified, taking into account severity of condition, time of service, and lowest design margin, as part of the implementation of the one-time inspection program (B.3.5) prior to the period of extended operation.	Complete. Program Basis Document PBD-29, "One-Time Inspection," includes the scope of one-time inspections.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
14.			ARs 29606-35, 29458-14, 29458-15, 29458-25, 29458-13, 29458-22, 29458-19, 29458-06	New fuel additions to the fire protection diesel fuel oil tank will be analyzed for water and sediment, and this water and sediment will be removed, to preclude water contamination, and the tank bottom will be monitored to ensure water or biological activity is not accumulating. Ultrasonic tests (UT) and/or visual inspections will be performed in the other storage tanks which credit this program for aging management. The low point beyond the main tank is the bottom of the day tank, and a day tank sample will be drawn from the bottom of the tank and analyzed for water and sediment. OPPD commits to performance of a one-time inspection... to determine the condition of the fire protection fuel oil tank and verify that the tank is not in a degraded condition.	Complete. Procedures have been updated. Deleted by letter dated May 30, 2012 (ADAMS Accession No. ML12152A191).
15.			ARs 29606-35, 29458-14, 29458-15, 29458-25, 29458-26	The fire protection day tank will be analyzed quarterly for water and sediment, semiannually for microbiological activity, and will have a one-time boroscope inspection performed.	Complete. Procedures have been updated, one-time inspection has been completed.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
16.			AR 29606-37	Enhancements will be made to the Fire Protection Program prior to the period of extended operation to implement the requirements of the interim staff guidance (on wall thinning of piping due to corrosion).	In progress.
17.			ARs 30178-05, 30178-06, 30178-07	OPPD has incorporated an augmented inspection of the thermal shield bolting or pins within the Reactor Vessel Internals Inspection Program...OPPD continues to monitor thermal shield vibrations as a task within the Reactor Vessel Internals Inspection Program (B.2.8).	Complete. By letter dated July 5, 2012, the NRC issued, "NRC Post-Approval License Renewal Inspection Report" (ADAMS Accession No. ML12187A068) which closed this commitment.
18.			AR 29561-08	Procedures will be revised to include acceptance criteria that a visual indication of loss of material or cracking of elastomer ventilation components identified by the accountable Operator or Engineer will not necessarily lead to an unacceptable component.	Complete. Procedures updated.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
19.			AR 29783-02	Add the following to the scope of components subject to the FCS Fatigue Monitoring Program: Pressurizer Surge Line bounding locations, and elbow Class 2 and 3 components not included in the NUREG-1801 program, which are subject to fatigue as an aging effect requiring management. The number of cycles assumed for the evaluation of the charging line nozzle will be included in the Fatigue Monitoring Program Basis Document, when it is generated, to assure that a CUF [cumulative usage factor] of 1.0 is not exceeded.	In progress. The work on the Chemical and Volume Control System (CVCS) piping replacement is calculating the CUF value for the charging nozzle.
20.			AR 29783-04	As part of the FMP [fatigue monitoring program], the NSSS [nuclear steam supply system] sampling piping will be analyzed and a stress calculation performed to determine the thermal stress range for the line.	In progress. Calculation has been completed, awaiting acceptance by owner.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
21.			ARs 30174-01, 30174-02, 30174-03, 30174-04, 30174-05, 30174-06	Specific guidance will be added to applicable inspection procedures to inspect for degradation of expansion anchors and surrounding concrete. Specific guidance will be added to applicable inspection procedures to identify acceptance criteria for general corrosion and degradation of expansion anchors and surrounding concrete. Specific guidance will be added to applicable inspection procedures to initiate FCS corrective action documentation if excessive general corrosion or cracking of concrete around expansion anchors is identified.	In progress. By letter dated July 5, 2012, the NRC issued, "NRC Post-Approval License Renewal Inspection Report" (ADAMS Accession No. ML12187A068) Commitment was reviewed but is not complete. CR 2012-05389 is tracking issues during the NRC inspection.
22.			AR 58218	OPPD will perform a one-time inspection of the circulating water discharge tunnel per the structures monitoring program (B.2.10). The circulating water discharge tunnel will be included within the scope of license renewal as part of the intake structure.	In progress. The licensee states that the USAR still needs to be updated and a preventive maintenance (PM) needs to be implemented to perform inspection periodically. Also being tracked under CR 2012-05070.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
23.			AR 29462	The following FCS-specific tasks will be added to the SMP: Performance of periodic sampling and evaluation of ground water. Guidance to inspect structural components when exposed by excavation. XI.S5 Specific guidance will be added to inspect masonry walls for cracking and condition of steel bracing. Specific acceptance criteria will be added to inspection procedures to be commensurate with industry codes, standards, and guidelines. XI.S6 Specific guidance will be added for inspection of component supports, new fuel storage rack, and the plant-specific components identified in the LRA Section 3 tables. Aging management activities related to these components will be commensurate with industry standards and practices as identified in the NUREG-1801 Structures Monitoring Program criteria.	In progress. The licensee states that the remaining open item is to update the groundwater sampling procedures, subtask 11.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
				Additional guidance commensurate with industry codes, standards, and guidelines, will be added to inspection procedures. XI.S7 Additional guidance will be added to the inspection procedure to identify specific parameters to inspect. Additional guidance will be added to review maintenance activities since last inspection. Specific acceptance criteria will be added to the inspection procedures to be commensurate with industry codes, standards, and guidelines.	
24.			AR 30487	Develop the thermal aging embittlement of cast austenitic stainless steel program which reflects the program elements of Generic Aging Lessons Learned aging management program XI.M12, and other commitments in response to the NRC staff's review, as documented in the responses to staff requests for additional information (RAIs) and potential open items (POIs).	In progress. The licensee states that the remaining open item is to submit leak before break to the NRC, which is still being updated by Westinghouse subtask 3.

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
25.			AR 29894-27	The aging effects of hardening and loss of strength for elastomers are not included in the general corrosion of external surfaces program (B.3.3). Enhancements will be made to add these aging effects requiring monitoring (AERMs) to preventive maintenance tasks under the PS/PMP (B.2.7) to specifically perform hands on type inspections of elastomer expansion joints, seals, and vibration isolators within the scope of license renewal for hardening and loss of strength. Applicable PMs are performed at least once per refueling cycle (approximately 18 months).	In progress.
26.			AR 30154-09	OPPD will submit to the NRC a license amendment request containing the fracture mechanics evaluation of the small-bore instrument nozzle J-weld region at the repaired instrument nozzle in the side of the pressurizer lower shell. This evaluation will include bounding of the flaw size by the size of the j-weld itself, and addressing the possibility of corrosion in the presence of a flaw.	Deleted. The licensee withdrew this commitment by letter dated October 6, 2010 (ADAMS Accession No. ML102810104).

Item No.	OPPD Reference Document	NRC Issuance	OPPD Tracking No.	Summary of Commitment	Licensee Implementation Status
27.	OPPD letter dated December 13, 2012, "Change to License Renewal Commitment Regarding Circulating Water Discharge Tunnel Inspection," (ADAMS Accession No. ML12349A320)	N/A	AR58218	OPPD will revise USAR Section 15.4, Item #32 from a one-time inspection to a recurring inspection requiring the circulating water (CW) discharge tunnel to be inspected every 3rd outage. OPPD will also develop and issue a recurring preventative maintenance (PM) work order to conduct the inspection.	In Progress. This commitment was not originally captured in Asset Suite and an incorrect AR No. was cited in the letter to the NRC. The licensee created CR to document the error and created a commitment is Asset Suite to track progress. However, the PM work order was being tracked in the licensee's corrective action program by CR2012-05070-007.

If you have any questions, please contact me at 301-415-1377 or via e-mail at Lynnea.Wilkins@nrc.gov.

Sincerely,

/ RA /

Lynnea E. Wilkins, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-285

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