



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

April 7, 2014

Mr. Joseph W. Shea  
Vice President - Nuclear Licensing  
Tennessee Valley Authority  
1101 Market Street, LP 3D-C  
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3 - AUDIT OF THE  
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS  
(TAC NOS. MF2412, MF2413, AND MF2414)

Dear 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 99-04 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. Prior to October 31, 2008, offsite evaluations of the commitment management were being performed by the NRC staff during the review of the actions for the restart of Browns Ferry Nuclear Plant (BFN) Unit 1 and other licensing actions. Therefore, it was determined that the offsite evaluations of these activities met the instructions of LIC-105 for regulatory requirements at BFN until October 31, 2008. As such, this audit was the first onsite audit since issuance of LIC-105 at the BFN.

An audit of the Browns Ferry commitment management program was performed at the plant site during the period August 13 through 15, 2013. During the audit the NRC staff identified a few errors in tracking of the regulatory commitments and an issue (potential finding) with managing/characterizing a regulatory commitment. Specifically, the NRC staff noted an issue concerning a regulatory commitment change that Tennessee Valley Authority (TVA) reported to the NRC in its letter dated November 30, 2011. During the audit, the NRC staff questioned the TVA's conclusion that only notification was required. Based on the review of the TVA evaluation of the change, the NRC staff believed that, the licensee should have requested the NRC's approval of the change. This issue is currently under review by the NRC's headquarters' staff and the Region II staff as apparent violations.

The NRC staff concludes that, based on the above audit, except for the aforementioned potential finding and other minor issues, (1) the licensee has implemented, or is tracking for future implementation regulatory commitments; (2) the licensee has implemented a program to manage regulatory commitment changes that is consistent with the guidance in NEI 99-04; and

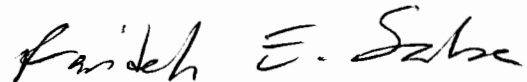
J. Shea

- 2 -

(3) the regulatory commitments are generally characterized as commitments versus obligations. Overall, the NRC staff believes that TVA has made progress in its commitment management procedures in recent years. Details of the audit are set forth in the enclosed report.

Should you have any questions regarding this letter, please contact me by phone at (301) 415-1447 or via e-mail at [Farideh.Saba@nrc.gov](mailto:Farideh.Saba@nrc.gov).

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba". The signature is written in a cursive style with a clear, legible font.

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-259, 50-260 and 50-296

Enclosure:  
Audit Report

cc w/encl: Distribution via Listserv



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

LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS

BROWNS FERRY NUCLEAR PLANT, UNIT NOS. 1, 2, AND 3

DOCKET NOS. 50-259, 50-260, AND 50-296

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC or the Commission) 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 99-04 guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, report 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 the regulatory commitments are being effectively implemented. Prior to October 31, 2008, offsite evaluations of the commitment management were being performed by the NRC staff during the review of the actions for the restart of Browns Ferry Nuclear Plant (BFN) Unit 1 and other licensing actions. Therefore, it was determined that the offsite evaluations of these activities met the instructions of LIC-105 for regulatory requirements at BFN until October 31, 2008.

Consequently, this audit was the first onsite audit since issuance of LIC-105 at the BFN site and the audit period covered 5 years instead of the LIC-105 instructed 3 years. An audit of the commitment management program covering the period from November 2008 through July 2013 was performed at the plant site during the period of August 13 through 15, 2013.

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.). The audit further includes evaluation of the licensee's commitment management procedures as compared to NEI 99-04 guidance, assessment of the licensee's commitment tracking database capabilities, appraisal of

Enclosure

procedures for changing commitments (for both internal licensee management and communication with the NRC), and verifying the non-existence of misapplied commitments.

## 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 of Licensee's Implementation of NRC Commitments

The audit addressed commitments initiated during the review period from October 31, 2008, to July 2013 and commitments that were in progress at the beginning of the audit period (October 2008). 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 were included in the sample, but the review was limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched Agencywide Documents Access and Management System (ADAMS) for the regulatory commitments in the licensee's submittals and the NRC staff's safety evaluations during the last 5 years and compiled all relevant regulatory commitments. Additionally, the NRC staff compared the collection of commitments found in ADAMS to the list created by the licensee for the same review period to check for inconsistencies.

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 (UFSARs). Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.
4. Commitments made in the Tennessee Valley Authority (TVA) submittals regarding license renewal application, since these commitments are captured in the UFSAR. Also, the NRC staff conducts post-approval inspections for BFN units in accordance with Inspection Procedure 71003, "Post-Approval Site Inspection for License Renewal."
5. The licensee's listed regulatory commitments that refer to the items in the attachments to the National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants" (NFPA 805) license amendment request (LAR). These commitments do not include the commitments that are listed as the regulatory commitments in the enclosure to the LAR and its supplement.

#### 2.1.2 Audit Results of Licensee's Implementation of NRC Commitments

Prior to the audit, the licensee provided lists of regulatory commitments related to licensing actions from its commitment management system MAXIMO, and the TVA's regulatory commitment procedures to support the NRC staff's audit. The licensee's lists included: all open BFN commitments, all BFN NRC commitments initiated since July 1, 2010, commitments that have been changed during the last 3 years that were, or will be, reported to NRC, and BFN commitments that have been changed during the last 3 years that were evaluated to not be reported to NRC. The lists provide the site identification (ID), the commitment ID number, initiated date, the status of the commitment, and the priority date (or due date) for the commitment. For the audit, the licensee prepared a spread sheet that included worksheets for the BFN closed commitments, BFN open commitments, Nuclear Power Group (NPG) open commitments, and NFPA 805 LAR open commitments. During the audit, the licensee included, as needed, commitment tracking load sheets, commitment completion forms, and commitment evaluation forms, and other supporting documents for the regulatory commitments to the NRC. For closed commitments, the licensee further provided documentation for the completion of the commitments, including return to operations notices, engineering change packages, and design change notices.

The licensee's commitment management program is described in the NPG Standard Program and Process (SPP), NPG-SPP-03.3, Revision 2, "NRC Commitment Management," effective February 19, 2013. The SPP is applicable to regulatory commitments made or modified after the effective date of this procedure. Prior to the audit, the licensee also provided the NRC staff with NPG-SPP-03.3, Revisions 0, 1, and 2. In addition, the licensee provided Revisions 8 and 9 of SPP-3.3 that was used for the NRC Commitment management prior to 2008.

During the audit, the NRC staff reviewed the licensee's procedure, NPG-SPP-03.3, Revision 2. This revision added seven requirements to the previous revision to improve commitment management according to the latest approved Corrective Action Plan. The NRC staff found that NPG-SPP-03.3, Revision 2, provides guidance to the licensee that is consistent with the intent of NEI 99-04, and ensures that BFN is appropriately implementing regulatory commitments. Furthermore, the NRC staff found that the procedure meets the requirements laid out in the NEI 99-04 guidance.

TVA upgraded to the MAXIMO database in 2009 from the TROI system. All commitments that were in progress at the time of the transition were carried over into MAXIMO. Commitments that were already closed were not transferred. Older closed commitments can still be searched for in the TROI system. All commitments with the code "NCO" at the beginning of the ID number were initiated in TROI, while those with a nine digit number were initiated in MAXIMO. The MAXIMO database is used throughout the NPG fleet, including their hydroelectric and fossil fuel plants in addition to their nuclear plants. The database is accessed from an internal NPG website, selecting work orders, and then nuclear commitment tracking. Both NPG wide and BFN specific commitments can be searched. Moreover, multiple search options are available to return only open, closed, BFN specific commitments, etc. In addition to the commitments ID number, each commitment has an accession number that incorporates the day TVA processes the commitment after submitting it to the NRC. While this date frequently matches the date the NRC has on record as the commitment initiation date, it does not always. Commitment load sheets are completed as soon as a commitment is written. TVA requires that a load sheet is completed before submitting commitments to the NRC. TVA corporate licensing staff and BFN licensing support staff can both add commitments to MAXIMO. Each commitment is listed with a "Commitment Status Date." This date reflects the last action completed in MAXIMO, whether the commitment was opened, closed, or edited. In 2012, TVA updated its policy on documentation, and now requires hardcopies of all commitment closure-related documents in the closure packages in addition to electronic copies. Previous to 2012, only electronic copies of the documents were required. All TVA documents are stored in the Enterprise Document Management System (EDMS). The newest commitments entered into MAXIMO contain links for their associated documents, which are also contained in hardcopy in the closure package.

Each commitment's due date is assigned to either the administrative "A" or commitment "C" category in the load sheet. Administrative due dates are internal and do not require NRC approval to be extended. Commitment due dates are docketed and, thus, require NRC approval for an extension. TVA labels commitments that are repeated over specified periods of time or are part of procedures or primitive maintenance activities as "programmatic."

The licensee's documentation includes commitment tracking load sheets, which are used to open a commitment in MAXIMO. The load sheets provide long and short descriptions of the commitment, priority date/due date, commitment category (A, C, or Programmatic), and type code that identifies regulatory commitments in response to different types of actions or communications with the NRC. The load sheet also has an EDMS reference number that links the commitment to its originating commitment. MAXIMO's commitment ID is added manually to the load sheet.

During the audit the NRC staff interviewed the TVA personnel and reviewed documentation generated by the licensee for the sample of the regulatory commitments listed in the enclosure in order to assess the implementation of each regulatory commitment, including the completion status. For the commitments selected for the audit, the NRC staff found that the licensee had adequately captured all but two of the regulatory commitments audited in their MAXIMO system. One of these commitments was withdrawn from MAXIMO due to NRC guidance. NRC did not receive notification documenting the withdrawal, but as the removal of the commitment was completed according to NRC's recommendation, the NRC staff does not consider this a major issue. A second commitment was overlooked when a supplement letter dated May 16, 2013, updated the regulatory commitments in the original LAR dated March 27, 2013. A new commitment (Commitment No. 19) was added to the updated list, but TVA did not enter the new commitment into MAXIMO (refer to Commitment 75 in the attached table).

The NRC staff noticed that the commitment descriptions that were provided in the commitment load sheets and MAXIMO did not always capture the exact wording of the regulatory commitment or a clear link to the commitment originating document. Therefore, it was not easy to compare the list provided by the licensee against the list of commitments found by the NRC staff from ADAMS.

The NRC staff reviewed the status of the implementation of the regulatory commitments that were made since the beginning of the audit period in 2008 and the commitments that were in progress in 2008. The NRC staff did not find any commitments that were completed past their priority date. It was noted however, that the MAXIMO database records the closure date of the commitment as the date the responsible TVA manager signs the closure package, not the actual date of commitment implementation. While the actual implementation date is listed in the commitment closure package, the signature date listed in MAXIMO often makes it appear that commitments are late, when they in fact are not.

The NRC staff noted that some older document submittals contained commitments in the document content that were not specifically identified under a "List of Regulatory Commitments" enclosure. While TVA did not identify these commitments in the submittal to the NRC, they were entered as regulatory commitments into the MAXIMO database, and they were correctly managed.

During the audit, the NRC staff reviewed plant procedures that have been revised as a result of commitments made by the licensee to the NRC. The NRC staff verified that the procedures that are affected by a regulatory commitment are identified in the MAXIMO database under the TVA commitment ID assigned for that commitment. Furthermore, in the procedure content, the related commitment is referenced directly after the subject matter in brackets. For a period of time TVA changed its commitment reference system by listing all referenced commitments in a separate document. This practice is currently being reversed; as procedures are updated, TVA is reverting back to the bracketed reference system.

The licensee's procedure owners are advised to refer to all the regulatory commitments associated with each procedure, prior to making any changes to the procedure. Details for how to handle procedural changes due to new regulatory commitments or commitment changes are

included in TVA's procedure NPG-SPP-01.1, "Administration of Standard Programs & Procedures (SPPs); Standard Department Procedures (SDPs); and Business Practices (BPs)," Revision 2. The review of the sample commitments and their affected procedural changes as documented in the commitment closure package were consistent with their counterparts tracked in the MAXIMO database and as documented by the NRC. The attached "Summary of Audit Results" table provides details of the audit and its results.

## 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. 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. The process used at BFN is contained in the NPG-SPP-03.3, which is based on and implements the recommendations of NEI 99-04. The audit reviewed 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.

### 2.2.1 Audit Results of the Licensee's Program for Managing NRC Commitment Changes

The NRC staff reviewed the licensee's procedure NPG-SPP-03.3, Revision 2, against NEI 99-04 to ensure that guidance in this procedure is consistent with the intent of NEI 99-04, and that BFN is appropriately implementing regulatory commitment changes, as well as tracking changes to the commitments.

The NRC staff found that NPG-SPP-03.3, Revision 2, adequately conforms to the guidance and intent of NEI 99-04 for commitment tracking, the commitment change process, traceability of commitments, and reporting requirements. Regulatory commitment changes are processed and tracked by the responsible licensing supervisor, or designee. The evaluation of any commitment changes is to be done by filling out the "Commitment Evaluation Form" instructions for which can be found in Attachment D of the procedure. The NRC staff reviewed this form and found it consistent with the intent of the "Commitment Evaluation" form in NEI 99-04.

During the audit, the licensee provided documentation for all commitment changes that have been, or will be, reported to the NRC in addition to those that have not been, and will not be, reported. The NRC staff reviewed the Commitment Evaluation Form for those changes that were reported to the NRC as well as for those that did not meet the NEI 99-04 criteria for reporting to the NRC. These changes were captured in MAXIMO and provided in a commitment closure package (for the closed commitments). Discussions with BFN staff confirmed that changes to regulatory commitments are generally being handled in accordance with the guidance contained in NEI 99-04.



During the audit, the NRC staff reviewed the licensee's letter dated November 30, 2011, "Summary Report for [Title 10 of *Code of Federal Regulations*] 10 CFR 50.59 Evaluations, Fire Protection Report Revision, Technical Specifications Bases Changes, Technical Requirement Manual Changes, and NRC Commitment Changes," which includes a summary of the BFN regulatory commitment changes for the period of July 1, 2009, through June 10, 2011. No "NRC Commitment Changes" were reported in the previous report dated November 30, 2009. The November 30, 2011, letter contained two changes to one regulatory commitment regarding the total required operations staffing for Appendix R safe shutdown (SSD), as stated in the TVA's letter dated November 15, 2006. The licensee stated that this regulatory commitment was revised in accordance with the NEI 99-04 guidelines. Accordingly, the licensee notified the NRC of this change in regulatory commitment changes in its November 30, 2011, letter.

Specifically, TVA, by letter dated November 15, 2006, requested an Appendix R license amendment. On page E1-7 of this request, the licensee stated that:

Operations staffing to support the Appendix R Safe Shutdown analysis and the implementation of the three unit Safe Shutdown Instructions (SSIs) have also been evaluated. Additional staffing to support combined Units 1, 2, and 3 SSIs includes an additional Unit Supervisor (US) Reactor Operator (RO), and two Auxiliary Unit Operators (AUOs) with a total staffing level one Shift Manager, four USs, six ROs, eight AUOs, and one Shift Technical Advisor [STA] as listed in TVA Department Procedure OPDP-1, "Conduct of Operations." The combined Units 1, 2, and 3 staffing requirements will be met prior to entering Mode 2.

Based on the NRC staff review of the November 15, 2006, request for license amendment, including the above requirements for total SSD staffing, the NRC issued Amendment Nos. 271, 300, and 259 for BFN Units 1, 2, and 3, dated April 25, 2007. The NRC staff's safety evaluation that restated required staffing was referenced in the Fire Protection License Conditions for BFN Units 1, 2, and 3, Conditions (13), (14), and (17) respectively, to accommodate operation for BFN's three units.

During the audit, the NRC questioned the TVA's conclusion that only notification was required. Based on the review of the TVA evaluation of the change, the NRC staff believed that the licensee should have requested the NRC's approval of the change.

Following the audit, the NRC project manager noticed that, on May 13, 2010, the licensee had notified the Region II Regional Administrator (RA) via a conference call that the staffing levels provided in OPDP-1 for minimum on-shift staffing did not meet the staffing levels submitted in Amendment Nos. 271, 300, and 259. By a 10 CFR 50.9 letter dated June 29, 2010, the licensee informed the RA that it did not meet the requirements of its licensing basis for BFN. The licensee also stated that it had completed a staffing assessment and determined that the existing minimum staffing levels contained in the procedure (i.e., three USs with one US filling the STA function) were adequate for successful implementation of all SSD actions for the bounding Appendix R fire scenario. However, as discussed earlier, TVA evaluated the staffing change as a regulatory commitment change and determined that no NRC's approval was needed and reported this change to the NRC in its November 30, 2011, letter for the

commitment changes. This issue is currently under review by the NRC's staff at the headquarters and Region II staff, as apparent violations.

The attached Audit Summary also provides details of this portion of the audit and its results. The NRC staff found that the TVA instruction for managing regulatory commitments, NPG-SPP-03.3, Revision 2, is consistent with the NEI 99-04 guidelines pertaining to commitment changes. However, TVA staff may need to better understand the applicability and implementation of commitment change evaluation.

### 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 NRC staff relied on the action comprising the commitment 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 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 included in the audit were reviewed to determine if any had been misapplied. No commitments were found 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 commitments included in the audit, all license amendment safety evaluations, exemptions, and relief request safety evaluations that have been issued for a facility during the last 5 years were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above. Included in the "Summary of Audit Results" is a list of licensing actions reviewed during this audit period.

### 2.4 Audit Observations and Suggestions

During the audit, the NRC staff noticed that:

- (1) The Commitment Tracking Database used by TVA does not provide a link or ADAMS accession number of the document in which the specific commitment was initially listed. NPG-SPP-03.3, Revision 2, states, "Close these commitments by referencing the withdrawal letter in the commitment database actions taken field. For example, add a note to the actions taken field similar to the following, 'This commitment was withdrawn in TVA's letter to NRC dated mm/dd/yyyy (EDMS *accession number*).' The NRC staff recommends applying this principle to all commitments, not only those in the closure process. Additionally, referencing the ADAMS accession number in addition to the EDMS accession number would help to compare TVA documents to NRC documents."

- (2) TVA uses the Commitment Tracking Database for all kinds of commitments for BFN (i.e., regulatory commitments, internal commitments, license renewal commitments, state commitments, etc.) to streamline the process. While this practice is convenient for a general view of all commitments, it was difficult to extract the commitments solely for this regulatory commitment audit with ease. Several lists had to be provided, parts of which were redundant. It would be beneficial to initiate a system for identifying the different kinds of commitments with ease. Options could include starting the name of each commitment with a code name (e.g., "Reg. Comm.") or inserting an additional column in the database with a similar code name. The goal is to make all commitments of a certain type easily searchable for audits in the future.
- (3) Within the lists from the Commitment Tracking Database provided by TVA were repeated commitments. This is a concern for effectively closing out commitments. If the commitment is completed but only one copy of the commitment is closed, according to the database the commitment is both open and closed. This confusion and the problems it could induce should be avoided by deleting out duplicates.
- (4) The wording in the Commitment Tracking Database, while similar to the commitments recorded in ADAMS documents from TVA, is not exactly the same. It would be easier to confirm consistencies between TVA's and NRC's commitments for BFN if the wording was identical.
- (5) The NPG-SPP-03.3 document is a very detailed guide for managing NRC commitments, however it does not provide insight on dealing with commitments that should be obligations. While the guidance acknowledges the difference between commitments and obligations, it does not lay out the process for changing commitments to obligations if required.

The licensee's staff has captured the issues that were identified during the audit in its corrective action program in the following service requests (SRs) and later in problem evaluation reports (PERs):

- PER 768396 - SR 767244: Commitment Change Evaluation Form for Commitment No. 114336733 incorrectly determined the change did not need to be reported to the NRC. The evaluation concluded that NRC notification was not required. However, the change was reported to the NRC in L44 130426 003. The NRC auditors believed that the responses to the evaluation form questions were answered incorrectly that NRC notification was required. The NRC auditor concluded this was a learning opportunity for better understanding of the Commitment Change Evaluation Process.
- PER 768399 -SR 767251: The second revision to 111323035 was not captured in MAXIMO.
- PER 770017 - SR 767252: Commitment Change Evaluation Form does not require the change to be captured in Commitment tracking Database.
- PER 770019 - SR 767255: The May 16, 2013 NFPA 805 LAR Supplement Letter contained a new regulatory commitment. This commitment has not been loaded in MAXIMO. No Completed Load Sheet could be located. The NRC auditor did not consider this an issue, because NFPA 805 LAR is still under NRC review.

- PER 770254 - SR 768437: Commitment Management Process Improvement Recommendations.
  - The Completion Date in MAXIMO does not always match the actual Closure Package Commitment Completion Date on the closure form. However, there was no instance where a commitment was not completed before the due date.
  - TVA could be more consistent in the way Regulatory Commitments are identified in their submittals.
- PER 768404: A change to Regulatory Commitment 111323035 was evaluated in accordance with NPG-SPP-03.3. The evaluation determined that BFN could revise this commitment without NRC Approval and notify the NRC in the periodic summary report. During the BFN Commitment Audit, the NRC questioned the TVA's conclusion that only notification is required. See Section 2.2.1 for details.

### 3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, except for the aforementioned potential finding and other minor issues, (1) the licensee has implemented, or is tracking for future implementation regulatory commitments; (2) the licensee has implemented a program to manage regulatory commitment changes that is consistent with the guidance in NEI 99-04; and (3) the regulatory commitments are generally characterized as commitments versus obligations. Overall, the NRC staff believes that TVA has made progress in its commitment management procedures in recent years. Details of the audit are set forth in the enclosed report.

### 4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Thomas Hess, TVA Corporate Licensing

Principal Contributors: Farideh E. Saba  
Naomi A. Lisse

Date: April 7, 2014

Attachment: Summary of Audit Results

## SUMMARY OF AUDIT RESULTS

### IMPLEMENTATION AND MANAGEMENT OF COMMITMENTS:

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
1	The first performance of the periodic assessment of the Control Room Envelope (CRE) Habitability, Technical Specification 5.5.13.c.(ii), shall be within 9 months following the initial implementation of the TS Change. The next performance of the periodic assessment will be in a period specified by the specified by the Control Room Envelope Habitability Program. That is 3 years from the last successful performance of the Technical Specification 5.5.13.c.(ii) tracer gas test.	NCO080018002	ML083650227	12/19/2008	7/16/2010	7/19/2010/ By a letter to the NRC.	Closed
2	The Automatic Depressurization System (ADS) will be modified to provide a single failure proof automatic initiation capability of 4 ADS valves, regardless of which 250VDC batter fails. This modification is expected to be made to BFN, Unit 3, during the Unit 3 outage in the spring of 2012 and to BFN, Unit 2, during the Unit 2 outage in the spring of 2013.	113108916 (U3, DCN 69959) (due date 4/27/12 completed on 5/17/12)	ML101250173	4/30/2010	4/27/2012	05/17/2012 <sup>1</sup>	Closed

<sup>1</sup> The commitment was to complete modification during the Unit 3 Outage in the spring of 2012. The original due date did not account for changes in outage schedule. This modification was completed prior to Unit 3 starting up following the spring 2012 Outage.

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
3	TVA will submit a license amendment request for Browns Ferry Nuclear Plant, Units 1, 2, and 3, to adopt NFPA Standard 805 by no later than March 29, 2013.	113359259	ML12017A186	1/13/2012	3/30/2013	4/17/2013	Closed
4	With respect to clarifying the regulatory commitments regarding the use of the extended CT for maintenance activities and/or the compensatory measures that will be used for TS Action entries that are not part of a planned maintenance activity, TVA will revise the proposed Technical Specifications and Bases and submit them to the NRC by July 30, 2010 to include the previous commitments in the proposed change as stated in Enclosure 1.	No Tracking ID	ML101590108	5/28/2010	07/30/2010	Withdrawn by letter dated 11/12/2010.	Closed
5	On or before November 30, 2010, the Tennessee Valley Authority will supplement our Cyber Security Plans to clarify the scope of systems described in Section 2.1, "Scope and Purpose." Section 2.1, will be amended to clarify the balance of plant SSCs that will be included in the scope of the cyber security program.	111509109	ML102790047	10/1/2010	10/31/2011	10/3/2012	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
6	TVA has implemented an Appendix R 95002 Task Force. The Appendix R 95002 Task Force is a group sponsored by TVA Nuclear Power Group senior management that is tasked with meeting the following objectives: (see document for objective. They're listed as separate commitments)	112064136	ML103070133	10/29/2010	3/4/2012	12/5/2011	Closed
7	General Operating Instruction, 0-GOI-300-1, "Operator Round Logs," will be revised to include: (1) requirements for Operations personnel to identify and correct hazards within the ISFSI Pad Exclusion Zone, and (2) Operations escort responsibilities within the ISFSI Pad Escort Zone.	111689505	ML103360040	11/29/2010	12/13/2010	12/20/2010	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
8	A. Browns Ferry Nuclear Plant (BFN) "Engineering Procedure for TOGs Initial Acceptance Testing" will direct a load test of the temporary diesel generators (TOGs) initially after acceptance from the TOGs rental vendor and once per 18 months (while the TOGs are in TVA's custody) which loads the pair of TOGs to 3.24 MWe using a resistive load bank. The same procedure will direct routine preventative maintenance and a monthly unloaded test run, while the TOGs are onsite, but only during periods when the TOGs are not credited as available during the extended allowed outage time (AOT). If the TOGs are needed again after being out of TVA control onsite, TVA will re-perform the acceptance testing prior to entering the next planned emergency diesel generator (EDG) inoperability that exceeds 7 days.	112906021	ML11152A167	5/27/2011	1/10/2012	3/6/2012 <sup>2</sup> Temporary Diesel Generator Surveillance Procedure 0-SR-3.8.1.1 (TDG Implementation) was revised under Work Order No. 112888110.	Closed

<sup>2</sup> This commitment was completed on Jaunty 9, 2012. However, the final signature was dated March 6, 2012.



Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
9	B. The TDGs will be protected, as a defense-in-depth, during the extended AOT, and will be routinely monitored when they are not required to be available for the extended EDG AOT.	112906036	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed
10	C. Required actions during an AOT greater than 7 days will be to verify the TDGs fuel tanks are at least 90 percent full and to keep one diesel Fuel Oil Storage Tank at least 60 percent full.	112906053	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed
11	D. Licensed Operators and Assistant Unit Operators will be appropriately trained on the purpose and use of the TDGs and the revised Safe Shutdown Instructions (SSIs). A briefing/discussion of the revised TS 3.8.1 and putting TDGs in service will be completed prior to a planned EDG inoperability that exceeds 7 days. Operating crews will be briefed on the EDG work plan and procedural actions regarding loss-of-offsite power and station blackout (SBO).	112906068	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
12	E. Operators will monitor weather forecasts each shift. Weather conditions will be evaluated prior to intentionally entering the extended EDG outage and will not be entered if official weather forecasts are predicting severe conditions (tornado or thunderstorm warnings). If severe weather or grid instability is expected after an EDG outage begins, station managers will assess the conditions and determine the best course for returning the EDG to an operable status.	112906104	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
13	F. The Transmission Operator system dispatcher will be contacted once per day and BFN will inform the dispatcher of the EDG status along with BFN offsite power needs. Prior to entering a planned EDG inoperability that exceeds 7 days, BFN Operating Crew will hold discussions with the system load dispatcher to ensure no significant grid perturbations are expected during the planned EDG inoperability that exceeds 7 days, and request that the system load dispatcher inform BFN if offsite power conditions change during a planned EDG inoperability that exceeds 7 days such that significant grid perturbations do occur or become expected.	112906152	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed
14	G. No discretionary switchyard maintenance will be allowed during the extended EDG maintenance period.	112906172	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
15	H. High Pressure Coolant Injection pump, Reactor Core Isolation Cooling pump, and the Residual Heat Removal pump associated with the operable EDG will not be removed from service for elective maintenance activities during the planned extended EDG AOT.	112906184	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed
16	I. TS Basis 3.8.1 B.2 is being revised to clarify the frequency requirements for the verification of TOGs availability. The revised wording is below: "In order to extend the Required Action B.5 Completion Time for an inoperable EOG from 7 days to 14 days inoperable, it is necessary to verify the availability of the TOGs within 1 hour on entry into TS 3.8.1 LCO and every 12 hours thereafter."	112906201	ML11152A167	5/27/2011	1/10/2012	12/12/2011 TS Basis 3.8.1.B.2 is changed. <sup>3</sup>	Closed

<sup>3</sup> It was not clear how changes to TS Bases were marked for the commitments

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
17	<p>J. Compensatory actions for fire protection impairments associated with the Yellow violation will remain in effect. In addition, TVA will implement additional actions that will mitigate fire risk during the extended AOT for each EOG, as follows:</p> <p>1. TVA will perform a qualitative analysis on electrical circuits/cable routing for each out-of-service (OOS) EOG for the 14-day AOT. This analysis will identify the fire areas where there is a lack of adequate cable separation associated with use of the TOGs. Hourly fire watches will be in effect for these areas. After the 7th day of the extended 14-day AOT, a continuous fire watch will be provided for the fire areas which lack cable separation, as identified in the Qualitative Analysis.</p> <p>2. TVA will revise the SSIs to incorporate guidance for use of the TOGs as an alternate alternating current (AC) power source for each OOS EOG. Additional or revised operator manual actions associated with the use of the TOGs in the SSIs</p>	112906273	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
	<p>will be minimized and validated. The TOGs as a replacement for an OOS EOG. Operators will be trained on the revised SSIs.</p> <p>3. After the 7th day of the extended 14-day AOT, an operator will be stationed at the TOGs to start the TOGs when directed, and to ensure reliable operation and equal load sharing of the TOGs.</p> <p>4. TVA will impose additional restrictions on hot work in the affected fire zones/areas, and on elective work on Appendix R components.</p> <p>5. Fire Operations personnel will perform walk downs to verify required controls of transient combustibles in affected fire zones/areas that could impact the operable EOGs, the TOGs' availability, offsite power availability, or the ability to use the Bus Tie Board prior to entering and during each shift for the duration of the extended AOT.</p>						

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
18	K. Revise appropriate procedures such that the initial emergency equipment cooling water pump is supplied by one of the remaining credited EDGs. The TDGs will be available in time to support the remaining functions which rely on AC power during a SBO.	112909205	ML11152A167	5/27/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed
19	L. Procedure O-SR-3.8.1.1 (OPS TDG Implementation) will include Manhole "E" sump pump monitoring.	112909245	1/10/2012	12/12/2011	1/10/2012	12/12/2011 Procedure was revised under Work Order No. 112888110	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
20	This is a cover letter for commitment 20.		ML11343A051	11/30/2011			N/A
20	The above revised commitment was re-evaluated and revised on October 25, 2010, using administrative controls that incorporate Nuclear Energy Institute 99-04, "Guideline For Managing NRC Commitments." The revised commitment, in italic, reads as follows: "...Total staffing level is one Shift Manager (SM), three Unit Supervisors (USs), six ROs, and eight AUOs. One of the US may be the STA. The incident Commander position shall be filled by an additional qualified person..."	111323035	ML11343A052	11/30/2011	12/31/2010	5/5/2011	Closed <sup>4</sup>
21	TVA will submit a detailed list of additional planned fire protection modifications for Browns Ferry Nuclear Plant, Units 1, 2, and 3, and associated implementation schedules by February 17, 2012.	113359371	ML12017A186	1/13/2012	2/17/2012	2/17/2012	Closed
22	The Tennessee Valley Authority will submit the revised Loss of Coolant Accident (LOCA) Analysis for Browns Ferry Nuclear Plant, Units 2 and 3, to the NRC for review and approval by July 30, 2012.	113418296	ML121850007	6/29/2012	7/30/2012	7/31/2012 Summary report was submitted to the NRC. <sup>5</sup>	Closed

<sup>4</sup> This is discussed under changed and misplaced commitments.



Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
23	1. TVA will provide the information in Requested Information Item 2 for the Communications Assessment (page 2 of the Communications section of Enclosure 5 of the letter) and Requested Information Items 3, 4 and 5 of the Staffing Assessment (page 3 of the Staffing section of Enclosure 5) by June 11, 2012.	113495108	ML12136A131	5/11/2012	6/11/2012	3/1/2013	Closed
24	2. TVA will provide the information in Requested Information Items 1 and 3 for the Communication Assessment (page 2 of the Communications section of Enclosure 5 of the letter) by October 31, 2012.	113495091	ML12136A131	5/11/2012	10/31/2012	11/1/2012	Closed
25	3. TVA will provide the information for Phase 1 (addressing the functions except those related to NTTF Recommendation 4.2) for Requested Information Items 1, 2, and 6 of the Staffing Assessment (pages 2 and 3 of the Staffing section of Enclosure 5 of the letter) by April 30, 2013.	113495035	ML12136A131	5/11/2012	4/30/2013	5/5/2013	Closed

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<sup>5</sup> This is also a change to the due date from June 30, 2012 to July 30, 2012. The licensee notified the NRC by a letter dated June 29, 2012, of this change.

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
26	4. TVA will provide the information for Phase 2 (addressing all functions including consideration of the results of NTTF Recommendation 4.2) for Requested Information Items 1, 2, and 6 of the Staffing Assessment (pages 2 and 3 of the Staffing section of Enclosure 5 to the letter) by dates that are four months before the earliest second refueling outage at each WVA operating site (Browns Ferry, Sequoyah, and Watts Bar) after the February 28, 2013, submittal of the Implementation Plans as required by NRC Order EA-12-049). [The projected dates, as based on the current forecast dates for those refueling outages, are provided in the tables in Enclosure 1 of this letter.]	113495007	ML12136A131	5/11/2012	11/2/2014		Open
27	5. TVA will provide an updated status of the completion schedule for the Phase 2 Staffing Assessment for Watts Bar specifically identifying any potential impact its completion resulting from the schedule of completion of Watts Bar Unit 2, by June 7, 2013.	113494915	ML12136A131	5/11/2012	6/7/2013	6/10/2013	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
28	1. TVA will develop documented guidance for deploying the portable generators procured for charging satellite phone batteries during and after a Beyond Design Basis External Event by March 29, 2013.	113594655	ML12164A678	6/11/2012	3/29/2013	3/27/2013	Closed
29	2. TVA will complete an evaluation of the need for additional transportation resources and access methods by January 31, 2013.	113594558	ML12164A678	6/11/2012	1/31/2013	1/30/2013	Closed
30	3. TVA will complete familiarization and emphasis of the revised ERO reporting expectations in case of large scale events when communications systems are challenged or are not working with ERO personnel by December 31, 2012.	113594602	ML12164A678	6/11/2012	12/31/2012	12/20/2012	Closed
31	1. A new radio system will be ready for service at Browns Ferry, Sequoyah, and Watts Bar Nuclear Plants by October 15, 2014.	114096057	ML12311A297	10/31/2012	10/15/2014		Open
32	2. TVA will purchase mobile radios and supply a portable satellite phone and spare battery for use in the NPG REP vans by October 15, 2014.	114096067	ML12311A297	10/31/2012	10/15/2014		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
33	3. TVA will evaluate moving the fixed Satellite phone antenna at each site to the roof of the Control Building so that the fixed satellite phone will remain protected from environmental and radiological conditions and available for use in the Emergency Response Facilities (ERFs) by October 15, 2014.	114096266	ML12311A297	10/31/2012	10/15/2014		Open
34	4. TVA will purchase a mobile Meteorological Tower for each site by October 15, 2014.	114096274	ML12311A297	10/31/2012	10/15/2014		Open
35	5. TVA will establish programmatic controls for EP-related communications systems/equipment to ensure availability and reliability including the requirements in Section 4.8 of NEI 12-01 by October 15, 2014.	114096292	ML12311A297	10/31/2012	10/15/2013		Open
36	6. TVA will evaluate the need for programmatic controls for the Government Emergency Telephone System (GETS)/Wireless Priority Service (WPS) programs by October 15, 2014.	114096303	ML12311A297	10/31/2012	10/15/2014		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
37	7. TVA will evaluate the need for SBO/Extended Loss of AC Power actions/tasks associated with shedding/restoring loads (sequencing) once AC power is restored or available by October 15, 2014.	114096309	ML12311A297	10/31/2012	10/15/2014		Open
38	8. TVA will evaluate the need for Extended Loss of AC Power actions/tasks using a systematic approach to training (SAT) process and include results in the Operations Training, applicable Technical Training, Security, and ERO Training Programs by October 15, 2014.	114096316	ML12311A297	10/31/2012	10/15/2014		Open
39	Technical Instruction 0-TI-565, One-Time Inspection Procedure to include acceptance criteria for inspection of elastomer components and specific guidance on determining the number of inspections to be performed for each aging effect within an inspection group by 10/1/13.	114457892	ML13067A398	2/28/2013	10/1/2013		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
40	When using AREVA Topical Report BAW-1 0247PA, Realistic Thermal Mechanical Fuel Rod Methodology for Boiling Water Reactors, Revision 0, February 2008, to determine core operating limits, the fuel cladding peak oxide thickness calculated by RODEX4 will be limited to less than the proprietary value defined in section 3.2.7 of AREVA report ANP-3159P revision 0, dated October 2012. Completion date: Upon implementation of the Unit 1, 2, and 3 license amendments authorizing the incorporation of AREVA Topical Report BAW-10247PA into Technical Specification 5.6.5.b.	114210392	ML13070A307	2/28/2013	4/30/2015		Open
41	1. TVA will submit a License Amendment Request proposing Technical Specifications requirements for the new emergency high pressure makeup pump system on a schedule to support the modification implementation date provided in Section 5.5 of the enclosure to this letter.	114569391	ML13141A291	5/16/2013			Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
42	2. TVA will revise the program that monitors BFN Residual Heat Removal (RHR) heat exchanger performance for consistency with the assumptions of the NFPA 805 Net Positive Suction Head (NPSH), Containment Parameters, and AREVA Fuel peak centerline temperature (PCT) Analysis calculation related to the RHR heat exchanger k-factor within 6 months following NRC approval of this amendment request.	114569398	ML13141A291	5/16/2013			Open
43	3. TVA will maintain the existing hourly roving fire watches for all existing BFN fire areas (FAs): until the modifications described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. The hourly roving fire watches for all existing BFN FAs is currently implemented.	114563404	ML13141A291	5/16/2013	5/31/2013	7/17/2013 <sup>6</sup> Verification will be done by inspection.	Closed

<sup>6</sup> This is the paperwork closure date. The commitment was completed on 5/30/13 with the issuance of the procedure revision (see closure package R20130717033). This footnote is applicable to all the commitments with the same scheduled due date and completion due date associated with the same document accession number (ML13141A291).

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
44	<p>4. TVA will implement stricter control of transient combustibles for the following BFN FAs: FA 01-03, FA 01-04, FA 02-02, FA 02-03, FA 02-04, FA 03-01, FA 03-02, FA 03-03, FA 04, FA 08, FA 09, FA 16 (except for Main Control Room), FA 20, FA 21, FA 22, FA 23, FA 24, FA 25-01, and FA 26 until the modifications described for the listed FAs in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. These controls will consist of:</p> <ul style="list-style-type: none"> <li>a. Requiring permits to allow transient combustibles into these higher risk areas;</li> <li>b. Tracking these permits to control quantities of transient combustibles allowed into these fire areas; and</li> <li>c. Performing once-per-shift walkdowns to ensure that transient combustible controls are satisfied (e.g., waste, debris, scraps, rags, or other combustibles resulting from work activities are removed from the subject fire areas, and that no transient combustibles are placed in the 20-foot exclusion zone(s) within the listed FAs).</li> </ul> <p>TVA will implement these controls by May 31, 2013.</p>	114569179	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed



Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
45	<p>5. TVA will implement controls limiting hot work activities (e.g., welding, cutting, and grinding) in FA 01-03, FA 01-04, FA 02-02, FA 02-03, FA 02-04, FA 03-01, FA 03-02, FA 03-03, FA 04, FA 08, FA 09, FA 16, FA 20, FA 21, FA 22, FA 23, FA 24, FA 25-01, FA 26, and FA SWITCH until the modifications described for the listed FAs in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. If hot work activities are necessary, the existing hot work controls specified in NPG-SPP-18.4.8, Control of Ignition Sources, shall be augmented to require that the Fire Brigade or Senior Reactor Operator perform a pre-job briefing in accordance with NPG-SPP-18.2.2, Human Performance Tools, and perform a walkdown for job area familiarization prior to performing the hot work activity. This walkdown shall include, ensuring travel path is clear of obstructions, identifying the location of fire hoses and fire extinguishers, and verifying fire suppression systems (manual and automatic) are properly aligned. TVA will implement these controls by May 31, 2013.</p>	114569185	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
46	6. TVA will implement controls to credit temporary diesel generators as an additional power source for a shutdown board, except during those periods when the temporary diesel generators are being used to support alternate decay heat removal until the modifications described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569214	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed
47	7. TVA will implement controls to protect RHR Pump 1A and its associated support systems whenever hot work activities are performed in FA 01-04, FA 04, and FA 09 until the modifications for the listed FAs described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569217	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
48	8. TVA will implement controls to protect the Unit 1 RHR Train A and its associated support systems whenever hot work activities are performed in FA 08 until the modifications associated with FA 08 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569224	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
49	9. TVA will implement controls to protect the following equipment whenever hot work is being performed in FA 02-02 until the modifications for FA 02-02 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed: a. Fire protection systems (detection and suppression) for this FA; b. north emergency equipment cooling water (EECW) header; c. 4kV Shutdown Board B, 3EA, 3EB; d. 250V DC Battery Charger 1; e. 480V reactor motor operated valve (RMOV) Board 1A, 2A, 2D; . 480V Shutdown Boards 1A and 2A; g. 2C RHR Pump; h. 480V Shutdown Board 2A Transformer TS2A; and Shutdown Board 250V DC Battery Charger SB-B. TVA will implement these controls by May 31, 2013.	114569344	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
50	<p>10. TVA will implement controls to protect the following equipment whenever hot work is being performed in FA 02-03 until the modifications for FA 02-03 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed:</p> <ul style="list-style-type: none"><li>a. Fire protection systems (detection and suppression) for this FA;</li><li>b. North EECW Header;</li><li>c. Residual Heat Removal Service Water (RHRSW) Pump D1;</li><li>d. 4kV Shutdown Board D, 3EA, 3EB;</li><li>e. 250V DC Battery Charger 1;</li><li>f. 480V RMOV Board 1A, 2B, and 3A;</li><li>g. 480V Shutdown Boards 1A and 2B;</li><li>h. 2D RHR Pump &amp; RHR Crosstie Unit 3 to Unit 2; and</li><li>i. 480V Shutdown Board 2B Transformer TS2B. TVA will implement these controls by May 31, 2013.</li></ul>	114569351	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
51	<p>11. TVA will implement controls to protect the following equipment whenever hot work is being performed in FA 02-04 until the modifications for FA 02-04 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed:</p> <ul style="list-style-type: none"><li>a. Fire protection systems (detection and suppression) for this FA;</li><li>b. North EECW Header;</li><li>c. B1 and D1 RHRSW Pump;</li><li>d. 4kV Shutdown Board D, 3EA, 3EB, and 3ED;</li><li>e. Shutdown Board 250V DC Battery Charger SB-D;</li><li>f. 480V RMOV Board 1A and 3B;</li><li>g. 2D RHR Pump; and</li><li>h. 480V Shutdown Board 2B Transformer TS2B.</li></ul> <p>TVA will implement these controls by May 31, 2013.</p>	114569356	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
52	12. TVA will implement controls to protect RHRSW Pump 2B and its associated support systems whenever hot work activities are performed in FA 03-03 until the modifications for FA 03-03 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569364	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed
53	13. TVA will institute 30-minute roving fire watches in FA 16 for non-continuously manned areas until the modifications for FA 16 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569369	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Completed by fire protection impairment permit No. 13-4035.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
54	14. TVA will designate the FA 04, FA 08, FA 09, FA 16 (Cable Spreading Room only), FA 22, FA 23, FA 24, and FA 25-01 as transient combustible-free areas and establish the same controls as the current 20-foot exclusion zones, except that tags required by plant procedures may be present in these FAs, until the modifications for the listed FAs described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569374	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed
55	15. TVA will implement controls to limit the unavailability of an entire EECW header (north or south) until the modifications for FA SWITCH described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569379	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed



Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
56	16. TVA will increase the testing frequency of automatic fire doors in FA 22, FA 23, and FA 24 to once-per-6 months until the modifications described for the listed FAs in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569381	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed
57	17. TVA will implement controls to protect the following equipment whenever hot work is being performed in FA 20 until the modifications for FA 20 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed: a. Fire protection systems (detection and suppression) for this FA; b. North EECW Header; c. 4kV Shutdown Board 3EA and 3EB; d. 480V Common Board 1 Transformer TC1A; and e. 250V DC Battery Charger 1. TVA will implement these controls by May 31, 2013.	114569383	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
58	18. TVA will implement controls to ensure that Heating, Ventilation and Air Conditioning (HVAC) is available to the BFN Unit 3 Main Control Room whenever Transformer TS3A is unavailable or the EECW South Header is unavailable until the modifications for FA 20 described in Attachment S, Table S-2, "Plant Modifications Committed," of the enclosure to this letter are installed. TVA will implement these controls by May 31, 2013.	114569386	ML13141A291	5/16/2013	5/31/2013	7/17/2013 Verification will be done by inspection.	Closed
59	1. TVA will complete a comprehensive evaluation of commercial grade dedicated items installed between September 1995 and November 2011 for the operating fleet, and correct any identified deficiencies by December 31, 2014.	114618583	ML13123A163	4/30/2013	12/31/2014		Open
60	2. TVA will provide the NRC with periodic written updates regarding progress of the project by the last day of July, October, January, and April of each year until the project is completed, beginning with the first written report to be filed by July 31, 2013.	114489096	ML13123A163	4/30/2013	12/31/2017		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
61	1. TVA will complete flooding walkdowns of the main steam tunnel flood walls at Browns Ferry Nuclear Plant, Unit 2, during the next refueling outage scheduled for the spring of 2013.	114251117	ML12335A340	11/27/2012	4/20/2013	4/20/2013 Submitted to the NRC	Closed
62	2. TVA will complete flooding walkdowns of the main steam tunnel flood walls at Browns Ferry Nuclear Plant, Unit 3, during the next refueling outage scheduled for the spring of 2014.	114251083	ML12335A340	11/27/2012	4/4/2014	Open	Open
63	1. TVA will complete seismic walkdowns of the areas that were unable to be inspected due to inaccessibility at Browns Ferry Nuclear Plant, Unit 2, during the next refueling outage scheduled for the spring of 2013.	114251200	ML13002A487	11/27/2012	4/20/2013 (spring refueling outage)	5/3/2013 Completed during refueling outage.	Closed
64	2. TVA will complete seismic walkdowns of the areas that were unable to be inspected due to inaccessibility at Browns Ferry Nuclear Plant, Unit 3, during the next refueling outage scheduled for the spring of 2014.	114251010	ML13002A487	11/27/2012	4/4/2014		Open
65	3. TVA will replace transformers BFN-0-OXF-219-TDA and BFN-0-OXF-219-TDB by September 30, 2014.	114252658	ML13002A487	11/27/2012	9/30/2014		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
66	Maintain the Task Force through completion of all root cause analysis corrective	112976925	ML103070133	10/29/2010	12/29/2015		Open
67	Return and maintain the Fire Protection System to excellent materiel and system	112976934	ML103070133	10/29/2010	12/29/2015		Open
68	Minimize fire impairments.	112976944	ML103070133	10/29/2010	12/29/2015		Open
69	Continue to reduce risk and improve safety margin on the Fire Protection System.	112976954	ML103070133	10/29/2010	12/14/2014		Open
70	Close 95002 self-assessment corrective actions and perform independent review	112976971	ML103070133	10/29/2010	12/29/2015		Open
71	Complete the root cause corrective actions as scheduled.	112976847	ML103070133	10/29/2010	12/29/2015		Open
72	Verify the accuracy and adequacy of completed 95002 actions items. - Utilize a 95002 Problem Evaluation Report action verification form - Utilize a closure review board - Perform quarterly Quality Assurance assessments of corrective actions	112976869	ML103070133	10/29/2010	12/29/2015		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
73	Implement semi-annual effectiveness review challenge boards by TVA Nuclear management. Challenge board members may include Executive Sponsor; Vice President, Nuclear Licensing; Site Vice President; 95002 Project Manager; Quality Assurance Manager; and others as required.	112976892	ML103070133	10/29/2010	12/29/2015		Open
74	Routinely update NRC Region II management on progress and status of meeting the Task Force objectives	112976911	ML103070133	10/29/2010	12/29/2015		Open
75	19. TVA will inform the NRC 30 days prior to discontinuing each of the interim compensatory measures identified in Commitments 3 through 18, above.	TVA missed to add this commitment to MAXIMO for NFPA 805.	ML13141A291	5/16/2013	No Specific date		
76	Install fuses in ammeter circuit for Battery Board 2.	113380100	ML13141A291	5/16/2013	9/27/2013	6/26/2013	Closed
77	Install fuses in ammeter circuit for Battery Board 3.	113380116	ML13141A291	5/16/2013	9/16/2012	7/5/2012/ Modifications were completed on 06/23/12	Closed
78	Install fuses in ammeter circuit for Battery Board 4.	113380128	ML13141A291	5/16/2013	6/22/2012	7/19/2012 Modifications were completed. Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
79	Install fuses in ammeter circuit for Battery Board 6.	113380138	ML13141A291	5/16/2013	4/6/2012	3/12/2012 Modifications were completed. Verification will be done by inspection.	Closed
80	Install controls in the Main Control Room to isolate 4kV from Unit 3 5 Shutdown Board 3EC from fire damage in 4kV Shutdown Refueling outage Board 3EA.	113380143	ML13141A291 (status update). Tom will email original commitment list.	05/16/2013 (status update from February commitment list)	05/15/2012 (estimated date)	05/18/2012 no late (commitment was due during spring 2012 outage)	Closed
81	Isolate and abandon local control station for Residual heat Removal Service Water (RHRSW) Pump A3	113380156	ML13141A291	5/16/2013	1/11/2013	8/3/2012 Verification will be done by inspection.	Closed
82	Isolate and abandon local control station for RHRSW Pump B1.	113380168	ML13141A291	5/16/2013	10/12/2012	7/19/2012 Verification will be done by inspection.	Closed
83	Isolate and abandon local control station for RHRSW Pump B2.	113380183	ML13141A291	5/16/2013	12/14/2012	10/17/2012	Closed
84	Isolate and abandon local control station for RHRSW Pump B3.	113380197	ML13141A291	5/16/2013	12/14/2012	10/17/2012 Verification will be done by inspection.	Closed
85	Isolate and abandon local control station for RHRSW Pump C1.	113380246	ML13141A291	5/16/2013	1/4/2013	9/3/2012 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
86	Isolate and abandon local control station for RHRSW Pump C2.	113380259	ML13141A291	5/16/2013	3/1/2013	8/30/2012 Verification by inspection	Closed
87	Isolate and abandon local control station for RHRSW Pump C3.	113380276	ML13141A291	5/16/2013	3/1/2013	8/29/2012 Verification by inspection	Closed
88	Isolate and abandon local control station for RHRSW Pump D1.	113380286	ML13141A291	5/16/2013	2/22/2013	2/12/2013 Verification by inspection	Closed
89	Isolate and abandon local control station for RHRSW Pump D2.	113380299	ML13141A291	5/16/2013	2/15/2013	11/16/2012 Verification by inspection	Closed
90	Isolate and abandon local control station for RHRSW Pump D3.	113380316	ML13141A291	5/16/2013	12/14/2012	9/21/2012 Verification by inspection	Closed
91	Install relays to isolate 4kV Shutdown Board A Normal Feeder Breaker 1614 control circuit from fire damage in 4kV Shutdown Board D.	113380395	ML13141A291	5/16/2013	12/1/2014		Open
92	Install relays to isolate 4 kV Shutdown Board A Alternate Feeder Breaker 1716 control circuit from fire damage in 4 kV Shutdown board C.	113380702	ML13141A291	5/16/2013	12/1/2014		Open
93	Install relays to isolate 4kV shutdown Board A Crosstie Breaker 1824 control circuit from fire damage in 4kV Shutdown Board 3EA.	113380795	ML13141A291	5/16/2013	12/1/2014		Open
94	Install relays to isolate 4kV Shutdown Board D Normal Feeder Breaker 1724 control circuit from fire damage in 4kV Shutdown Board C.	113380952	ML13141A291	5/16/2013	6/1/2013	4/17/2013 Verification will be done by inspection.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
95	Install relays to isolate 4kV Shutdown Board A Crosstie Breaker 1826 control circuit from fire damage in 4kV Shutdown board 3ED.	113380956	ML13141A291	5/16/2013	6/1/2013	4/17/2013 Verification by inspection	Closed
96	Separate normal power cables for 480 RMOV Board 3B from FA 13.	113380966	ML13141A291	5/16/2013	6/1/2014		Open
97	Install incipient fire detection in the Unit 1 Auxiliary Instrument Room.	113380973	ML13141A291	5/16/2013	12/1/2014		Open
98	Install incipient fire detection in the Unit 2 Auxiliary Instrument Room.	113380987	ML13141A291	5/16/2013	6/1/2013	5/3/2013 Verification by inspection	Closed
99	Install incipient fire detection in the Unit 3 Auxiliary Instrument Room.	113380993	ML13141A291	5/16/2013	6/1/2014		Open
100	Separate normal cables required for Unit 1 RCIC from FA 17.	113381009	ML13141A291	5/16/2013	12/1/2014		Open
101	Enhance the Cooling-Water System program to preform confirmatory inspections of the RHRSW pump pit supply piping, sluice gate valves and seismic restraints in the RHRSW pump pit. Once prior to the period of extended operation.	NCO040006091		08/09/2005	10/2/2013	07/06/12 License renewal commitment	Closed
102	05/10/04 - The accessible non-environmental qualification cables and connections program will be implemented prior to the period of extended operation.	NCO040006001	ML040060359	12/31/2003	12/20/2013	7/27/2012 License renewal commitment.	Closed



Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
103	BFN will complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of inaccessible piping sections and submit supplemental responses to NRC documenting completion of the walkdowns and any impact upon the GL 2008-01 response as a result of completed evaluation with 90 days following the U2 15 Refueling Outage.	NCO080027008	ML081970084	7/11/2008	9/21/2009	10/19/2009	Closed
104	BFN will complete the detailed walkdowns of BFN Unit 3 inaccessible piping sections of GL 2008-01 subject systems prior to startup from the U314 Refueling Outage.	NCO080027006	ML0819970084	7/11/2008	4/26/2010	4/6/2010	Closed
105	BFN will complete evaluations of GL 2008-01 subject systems using results of the detailed walkdowns of inaccessible piping sections and submit supplemental responses to NRC documenting completion of the walkdowns and any impact upon the GL 2008-01 response as a result of completed evaluation within 90 days following startup from the U3 14 Refueling Outage.	NCO080027009	ML0819970084	7/11/2008	7/25/2010	7/19/2010	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
106	TVA Will Perform a self-assessment on access authorization and adherence to behavior observation program by September 1, 2009.	NCO090008001	ML083151215 (document has due date as fourth quarter of 200*)	2/11/2008	9/1/2009	12/20/2010	Closed
107	TVA will be in full compliance with 10 CFR 73.55(i)(4)(i)(A) - (D), 10 CFR 73.55(e)(7)(i)(C) and 10 CFR 73.55(i)(3)(vii) for Browns Ferry Nuclear Plant by December 20, 2012.	10292967	ML093160117	11/6/2009	12/20/2012	12/6/2012	Closed
108	Tech Spec Change TS-473, AREVA Fuel Transition. The following revisions will be proposed for BFN Unit 2 and 3 in future Tech Spec Change Request(s): a. Revisions to TS 3.3.1.1, Reactor Protection Systems Instrumentation, for the Oscillation Power Range Monitor Upscale Function, (i.e., Function 2.f, to indicate that OPRM period based detection algorithm setpoint limits are included in COLR. b. Corresponding revisions are to TS 5.6.5.a to include the OPRM setpoint as a COLR item. c. Revisions to TS 5.6.5.b to include the AREVA stability related Topical Reports which describe the analytical methods used for determining the OPRM period based detection algorithm setpoint limits.	112910279	ML101160153	4/16/2010	4/18/2011	3/28/2013 Completed by submitting a license amendment request.	Closed

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
109	Implement changes to Unit 1 Periodic Inspection Program for License Renewal (1-TI-521). TVA will implement changes to Unit 1 Periodic Inspection program for License Renewal to include inspections of small diameter stainless steel piping/tubing (1/2 inch to 1 inch). Procedure revision and implementation will be completed by October 10, 2012.	113489673	ML12123A707	4/30/2012	10/10/2012	7/20/2012	Closed
110	JOG Class D MOVs for BFN TVA will provide the NRC with the following information: Population of BFN identified Class "D" MOVs; Corresponding implementation schedule for completion of modifications to allow classification of the identified Class "D" Motor-Operated Valves as Class "A" or Class "B"	113967397	ML12272A119	9/25/2012	12/14/2012	12/14/2012 Reported to the NRC	Closed
111	The one-time inspection program will be implemented and completed prior to the period of extended operation.	NCO040006008	ML040060359	12/31/2003	8/29/2013		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
112	A turbine trip/generator load reject transient test from nominal EPU rated power conditions will be a turbine trip/generator load reject transient test from nominal EPU rated power conditions will be performed within 60 days of operation at EPU power on Unit 1.--Bcm/Bab	NCO070019001	ML072960311	10/22/2007	1/15/2014		Open
113	For GE based fuels methods applications, The Unit 1 core r-factor calculation at a bundle level will be consistent with the lattice axial void conditions expected for the hot channel operating state. --Bcm/Bab	NCO080017001	ML080530256	2/21/2008	1/15/2014		Open
114	Before applying 10 weight percent Gadolinium To U1 GE EPU licensing applications, the GE thermal-mechanical (t-m) licensing topical report demonstrating that the t-m acceptance criteria specified in Gestar ii and Amendment 222 To Gestar ii can be met for steady-state and transient conditions must be NRC-approved.	NCO080017002	ML080530256	2/21/2008	1/15/2014		Open
115	For GE Based Unit 1 EPU fuels methods applications, the calibration errors due to bypass voiding will be accounted for determining oscillation power range monitor setpoints for the detect and suppress long term methodology.	NCO080017003	ML080530256	2/21/2008	1/15/2014		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
116	<p>MOV's will be in compliance with GL 89-10 Program.</p> <p>The TVA has added the following motor-operated valves (MOV's) to the Generic Letter (GL) 89-10 program. These MOV's, with the exception of 1-FCV-74-01, 1 FCV 74-02, 1-FCV-71-19, 2-FCV-71-19, and 3-FCV-71-19, will be in full compliance with GL 89-10 program requirements by the end of the Browns Ferry Nuclear Plant, Unit 2, Spring 2013 refueling outage. For valves 1-FCV-74-01, 1 FCV 74-02, 1-FCV-71-19, these MOV's will be in full compliance with GL 89-10 program requirements by the end of the Browns Ferry Nuclear Plant, Unit 1, Fall 2014 refueling outage. For valve 2-FCV-71-19, this MOV will be in full compliance with GL 89-10 program requirements by the end of the Browns Ferry Nuclear Plant, Unit 2, Spring 2015 refueling outage. For valve 3-FCV-71-19, this MOV will be in full compliance with GL 89-10 program requirements by the end of the Browns Ferry Nuclear Plant, Unit 3, Spring 2014 refueling outage.</p>	114336733	ML13037A090	1/31/2013	3/15/2014		Open

Reg Comm No.	Commitment Summary	TVA Commitment ID No	Document Accession No.	Document Date	Scheduled Due Date	Completion Date and Method of Closure	Commitment Status
117	The Automatic Depressurization System (ADS) will be modified to provide a single failure proof automatic initiation capability of 4 ADS valves, regardless of which 250VDC batter fails. This modification is expected to be made to BFN, Unit 1, during the Unit 1 outage in the fall of 2012.	113108684 (U1)			11/24/2012	11/16/2012	Closed
118	(U2) TS Change TS-473, AREVA Fuel Transition ADS will be modified to provide a single failure proof automatic initiation capability of 4 ADS valves, regardless of which 250 VDC battery fails.	113108813 (U2)	ML101250173	04/30/2010	4/28/2013	4/17/2013 Closed by DCN 70049A	Closed

J. Shea

- 2 -

(3) the regulatory commitments are generally characterized as commitments versus obligations. Overall, the NRC staff believes that TVA has made progress in its commitment management procedures in recent years. Details of the audit are set forth in the enclosed report.

Should you have any questions regarding this letter, please contact me by phone at (301) 415-1447 or via e-mail at [Farideh.Saba@nrc.gov](mailto:Farideh.Saba@nrc.gov).

Sincerely,

*/RA/*

Farideh E. Saba, Senior Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-259, 50-260 and 50-296

Enclosure:  
Audit Report

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DATE	N/A	4/1/14	3/31/14	4/7/14	4/7/14

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