



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

June 13, 2014

Mr. Mark E. Reddemann
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. MF4059)

Dear Mr. Reddemann:

An audit of the Columbia Generating Station commitment management program was performed at the plant site during the period May 12-15, 2014. 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, 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.

Based on the audit, the NRC staff concludes that Energy Northwest (the licensee) has implemented NRC commitments on a timely basis and has implemented its program for managing NRC commitment changes. The details of the results of the audit are set forth in the enclosed audit report.

I appreciate the assistance and support provided by your licensing staff during the audit, particularly Mr. Mot Hedges.

M. Reddemann

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If you have any questions, please contact me at 301-415-2296 or via e-mail at fred.lyon@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "CF Lyon". The letters are cursive and somewhat stylized.

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
As stated

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

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 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 (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.

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 activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Columbia Generating Station (CGS) commitment management program was performed at the plant site during the period May 12-15, 2014. The audit reviewed commitments made by Energy Northwest (EN, the licensee) since the previous audit on September 21-22, 2011, which was documented in an audit report dated February 10, 2012 (ADAMS Accession No. ML120180248). The audit consisted of two major parts: (1) verification

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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 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 licensee's commitments are tracked in a computer database and are managed in accordance with site-wide procedure SWP-LIC-01, "Regulatory Commitment Management," Revision 4, which describes the regulatory commitment management process at Energy Northwest. The process is based on the guidance provided in NEI 99-04, Revision 0. The procedure includes a consistent process to change NRC regulatory commitments of low safety significance without adversely affecting the level of safety. The procedure is referenced to complementary procedures SWP-LIC-03, "Licensing Document Change Process," Revision 14, and SWP-LIC-02, "Licensing Basis Impact Determinations," Revision 12.

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.

2.1.2 Audit Results

For this audit, the NRC staff reviewed open and closed regulatory commitments to confirm that the licensee had implemented closed commitments appropriately, and that commitments still

open had been captured in an effective program for future implementation as required by CGS. The NRC staff reviewed relevant reports and summary sheets from the computer database and other sources (e.g., corrective action documentation, plant procedures, job numbers, night orders, documented training, etc.) providing the status of each commitment, form of implementation, and any pending further action. Based on the review of reports provided by the licensee as described above and on queries of the database during the audit, the NRC staff found that the licensee has generally implemented commitments on a timely basis.

For this audit, the open commitments in the database were compared to licensee correspondence since the previous audit. No substantive deficiencies were noted. The auditor reviewed commitments closed since the last audit, and no discrepancies were noted. The majority of the licensee's commitments were associated with cyber security program (CSP) or Fukushima Near-Term Task Force (NTTF) correspondence. The licensee had a total of 18 non-CSP/NTTF commitments, of which seven were open. The auditor reviewed all non-CSP/NTTF commitments and a sample of commitments associated with the CSP and NTTF. There were no substantive issues.

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 auditors reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC. The auditors also verified 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.

2.2.1 Audit Results

The NRC staff reviewed procedure SWP-LIC-01 and associated procedures SWP-LIC-03 and SWP-LIC-02, and their required forms to determine whether the licensee had an effective program in place to identify, manage, and close commitments made to the NRC as part of licensing actions/activities. In addition, the NRC staff reviewed relevant reports and summary sheets from the computer database and other sources providing the status of each commitment, tracking and change forms, and other associated documentation.

The NRC staff compared the guidance in the CGS procedures to the guidance in NEI 99-04. As a result of this comparison, the NRC staff found that the CGS procedures were consistent with the NEI guidance for identifying, managing, and closing commitments. The NRC staff also found that roles and responsibilities, processes, and metrics were clearly identified in the CGS procedure.

Based on the review of the reports provided by the licensee as described above, queries of the database, and the accompanying change review and tracking forms provided during the audit,

the NRC staff found that the licensee's implementation of its program for managing NRC commitment changes in accordance with its site procedure is satisfactory.

3.0 CONCLUSION

The NRC staff concludes, based on the audit, that (1) EN has generally implemented NRC commitments on a timely basis, and (2) EN has implemented its program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Lisa Williams
Mot Hedges

Principal Contributor: F. Lyon

Date: June 13, 2014

M. Reddemann

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If you have any questions regarding this matter, I may be reached at (301) 415-2296 or via e-mail at fred.lyon@nrc.gov.

Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

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