



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

September 2, 2014

Mr. Rafael Flores
Senior Vice President and
Chief Nuclear Officer
Attention: Regulatory Affairs
Luminant Generation Company LLC
P.O. Box 1002
Glen Rose, TX 76043

**SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 – AUDIT OF
THE LICENSEE’S MANAGEMENT OF REGULATORY COMMITMENTS (TAC
NOS. MF3370 AND MF3371)**

Dear Mr. Flores:

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

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

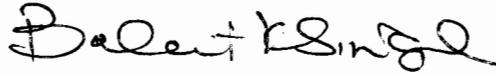
An audit of Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2, commitment management program was performed at the plant site on July 15-17, 2014. The NRC staff concludes, based on the audit, that Luminant Generation Company LLC (the licensee) has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes at CPNPP, Units 1 and 2. The details of the audit including the NRC staff’s observations and recommendations are set forth in the enclosed audit report.

R. Flores

- 2 -

The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3016.

Sincerely,



Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure:
Audit Report

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UNITED STATES
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

LUMINANT GENERATION COMPANY LLC

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION AND BACKGROUND

In 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 U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," (ADAMS Accession No. ML003680088) 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. NEI 99-04 describes a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee by a certain date 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.

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

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Comanche Peak Nuclear Power Plant (CPNPP), Units 1 and 2, commitment management program was performed at the plant site on July 15-17, 2014. The audit reviewed commitments made since the previous audit on August 16-17, 2011 (audit report issued on

Enclosure

September 23, 2011 (ADAMS Accession No. ML112440514). The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments, 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.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, relief requests, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff searched ADAMS for the licensee's submittals since the last audit and selected a representative sample of regulatory commitments for verification. The identified list of commitments was forwarded to the licensee with a request to locate documentation for the listed regulatory commitments ahead of the NRC staff visit.

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 and Technical Specifications. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

Luminant Generation Company LLC (Luminant, the licensee) has implemented Procedure STA-509, "Commitments Management Program," which identifies the methods and site organization tools for managing development, review, and implementation of station commitments. The licensee's Procedure REG-509, "Nuclear Licensing Commitment Administration," establishes the processes, guidelines, and activities the licensee uses to manage the development, review, and implementation of commitments generated from regulatory obligations and self-imposed requirements. An electronic commitment tracking

system (ECTS) database is used in conjunction with other information sources to address and track regulatory commitments.

The documents furnished by the licensee during the audit included summary sheets from the ECTS database providing the status of the commitments and appropriate backup documentation, as needed (i.e., plant procedures, examination records, and/or other plant documentation). The NRC staff reviewed the documents and summarized the selected commitments information in the Attachment to this audit report.

The NRC staff's audit was intended to confirm that the licensee has documented its implementation of its regulatory commitments made to the NRC staff as part of past licensing communications, and the commitments that had not yet been implemented or incorporated in design bases documents are captured in an effective manner for future implementation.

As discussed above, the ECTS and commitments material change evaluation (CMCE) provided by the licensee's Procedures STA-509 and REG-509, provide acceptable tools for the licensee to capture the NRC guidance on commitment management programs. The licensee enters the regulatory commitments made to the NRC into a database. The regulatory commitments are labeled as regulatory commitments. Each commitment is numbered and described by a commitment title and a brief description. Status of the commitments, implementation dates, target implementation (documents which finally capture the commitment) document information associated with each specific commitment, and comments are captured in the database. The licensee's staff is well trained in updating the commitment management program.

The licensee has maintained the ECTS database very well and all the commitments selected for this audit were traceable in the database. For commitments already incorporated, the database provided an accurate status of the commitment providing reference to the implementation document. The NRC staff's audit of the licensee's commitment management program for CPNPP, Units 1 and 2, did not identify any regulatory commitments that were not satisfied or incorporated except for the ones described below. However, none of the items identified below had any safety significance.

Commitment No. 4356619

For the condition monitoring (CM) assessment, the component of operational leakage from the prior cycle from below the H* distance will be multiplied by a factor of 3.16 and added to the total accident leakage from any other source and compared to the allowable accident induced leakage limit. For the operational assessment (OA), the difference in the leakage between the allowed accident induced leakage and the accident-induced leakage from sources other than the tubesheet expansion region will be divided by 3.16 and compared to the observed operational leakage. An administrative limit will be established to not exceed the calculated value.

Procedure NDE 7.14, "Non Destructive Examination Program Manual" Section 6.1.1.1 was revised to incorporate the commitment. However, the ECTS database did not recognize the procedure revised to incorporate the commitment. The licensee wrote a Condition Report (CR) 2014-007691 on July 1, 2014, to correct the database.

Commitment No. 4408996

Luminant will maintain Spent Fuel Pool boron concentration at or above 2400 ppm [parts per million], above that required for operability as allowed in Technical Specification 3.7.16, "Fuel Storage Pool Boron Concentration" (2000 ppm).

As per data ECTS database, Data Sheets ODA-308-3.7.16, ODA-308-3.9.1, and ODA-308-3.9.0 for Procedure ODA-308, "LCO [Limiting Conditions for Operation] Tracking Program," were supposed to be revised to incorporate the commitment. The licensee missed revising Data Sheet ODA-308-3.9.0, but closed the commitment. CR 2014-007707 was generated on July 1, 2014, to incorporate the commitment in to Data Sheet ODA-308-3.9.0.

Commitment No. 4392919

Conduct and provide results for an onsite and augmented staffing assessment considering all requested functions except those related to NTTF [Near Term Task Force] Recommendation 4.2. [Phase 1 staffing assessment for Staffing Request 1]

The ECTS database indicates the commitment was closed by letter dated April 30, 2013 (ADAMS Accession No. ML13128A077). However, the letter dated April 30, 2013, does not state specifically which commitments were closed. It also does not reference the letter dated June 5, 2012 (ADAMS Accession No. ML12177A055), which made the commitment. There was no corrective action assigned.

Commitment No. 4392934

Provide a schedule of the time needed to implement changes associated with the Phase 1 staffing assessment [for Staffing Request 2].

The ECTS database indicates the commitment was closed by letter dated April 30, 2013 (ADAMS Accession No. ML13128A077). However, the letter dated April 30, 2013, does not state specifically which commitments were closed. It also does not reference the letter dated June 5, 2012 (ADAMS Accession No. ML12177A055), which made the commitment. There was no corrective action assigned.

Commitment No. 4392954

Identify changes associated with the Phase 1 staffing assessment that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC [alternating

current] power, multi-unit event, including any new or revised agreements with offsite resource providers [for Staffing Request 6].

The ECTS database indicates the commitment was closed by letter dated April 30, 2013 (ADAMS Accession No. ML13128A077). However, the letter dated April 30, 2013, does not state specifically which commitments were closed. It also does not reference the letter dated June 5, 2012 (ADAMS Accession No. ML12177A055), which made the commitment. There was no corrective action assigned.

Commitment No. 4430943

Luminant confirms that it will use the seismic walkdown guidance (EPRI [Electric Power Research Institute] 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic") as endorsed by Reference 2 to conduct the walkdowns and develop the needed information at CPNPP.

The licensee submitted seismic walkdown report and confirmed that walkdowns were performed consistent with NRC-endorsed EPRI guidance by letter dated November 27, 2012 (ADAMS Accession No. ML12340A433). However, the letter did not make a reference to the original commitment and did not clearly state that it closed the commitment. There was no corrective action assigned.

Commitment No. 4630681

Identify and Integrate into the ERO [Emergency Response Organization] notification/activation protocol those non-ERO response personnel (e.g., Operations and Maintenance) necessary to support expanded response capability functions.

The commitment was scheduled for completion by December 31, 2013, but was changed to May 22, 2014, by the licensee. Emergency Planning (EP) department concludes that CPNPP employs "all-call, all come" approach to ERO response and there was no need to make this commitment and commitment should be closed. However, operations department considers the commitment to be valid. CRs 2014-007478 and 2014-007889 were generated on June 24 and July 3, 2014, respectively, to resolve the concerns by operations. The licensee is in the process of performing an evaluation to determine the need and status of the commitment.

To ensure that the regulatory commitments are not removed or changed in future revisions to the target documents, the licensee performs a database search to identify all the open and closed commitments against the document/procedure being revised and this ensures that all the closed commitments are captured. In addition, the plant procedures require that all the specific regulatory commitments pertaining to the individual document be included in the reference section. This ensures that the commitments, are neither removed nor changed, without management approval.

Based on the results of the on-site audit, the NRC staff concludes that the licensee has implemented the regulatory commitment management program effectively in accordance with

LIC-105, Revision 5, "Managing Regulatory Commitments Made by Licensees to the NRC," (ADAMS Accession No. ML13193A358) and consistent with NEI 99-04. The discrepancies identified by the NRC staff are minor in nature and do not have any safety significance.

The Attachment to this audit report contains details of the audit and a summary of the audit 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 process used at CPNPP, Units 1 and 2, is contained in Procedures STA-509 and REG-509. The primary focus of the audit was to ensure that the commitments are implemented without a change and if a change is made, it is in accordance with the approved plant procedures and with the approval of the plant's management. The audit also verified that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that the licensee's 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

Detailed processes are outlined by which the licensee carries out obligations under its regulatory commitments. Any changes to the commitments are processed through the CMCE process. Changes to obligatory commitments are reported to the NRC in accordance with the recommendations of LIC-105. CMCE identifies the affected commitments, their origin, original criteria, proposed changes, and justification for change. The commitment changes are documented in CMCE forms for submittal to the NRC staff.

The licensee performed an ECTS database search and provided a list of commitment changes made since the last audit. The list contained a total of 66 items, identified as commitment changes. However, the NRC staff review indicated that majority of the items on the list were changes to the internal commitment dates and did not represent a change to the Regulatory Commitment date. The NRC staff identified only five commitment changes and only one of these required the NRC staff notification.

Based on the results of the on-site audit, the NRC staff concludes that the licensee has implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04. However, a weakness in the ECTS database to identify regulatory commitments changes not internal to the licensee was identified. The licensee agreed to modify the ECTS database fields to ensure that regulatory commitment changes are adequately captured during the search.

2.3 Verification that Reviewed Regulatory Commitments were Correctly Applied in NRC Staff Licensing Action Reviews

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

Each of the commitments selected for the audit sample were reviewed to determine if any had been misapplied. Based on the NRC staff review of the safety evaluations and staff assessments issued for the audit period, it was determined that the commitments reviewed by the NRC staff were explicit statements made by the licensee to take specific action in support of the specific licensing action and were correctly applied while reviewing the licensing actions.

3.0 OBSERVATIONS AND RECOMMENDATIONS

A weakness in the ECTS database to identify regulatory commitments changes not internal to the licensee was identified. From a list of 66 commitment changes identified by the database search, only five were actual regulatory commitment changes. The licensee agreed to modify the ECTS database fields to ensure that regulatory commitment changes are adequately captured during the search.

During the audit in 2011, the NRC staff noticed that the ECTS database does not include a field to state the closing date for the commitment and recommended that ECTS database should include an additional field to clearly state the commitment closing date. The licensee generated CR-2011-010459 on September 23, 2011 to address the NRC staff concern. The CR was closed on March 3, 2012 with no change to the ECTS database. The licensee staff was unable to provide a justification for closing the CR without any change to the ECTS database during the audit and generated another CR-2014-008661 on August 4, 2014 to address the NRC staff concern.

4.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the regulatory commitment management program effectively, and implemented regulatory commitment changes appropriately, in accordance with LIC-105 and consistent with NEI 99-04. The specific observations and recommendations identified during the audit are detailed in Section 3.0 of the report.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Tamera Ervin-Walker and Steve Dixon.

Principal Contributor: Balwant K. Singal

Date: September 2, 2014

Attachment:
Regulatory Commitments and
Summary of Audit Results

**REGULATORY COMMITMENTS AND SUMMARY OF AUDIT RESULTS
COMANCHE PEAK NUCLEAR POWER PLANT
AUDIT PERFORMED FROM July 15-17, 2014**

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-13091, dated May 16, 2013 (ADAMS Accession No. ML13149A101)	Closure Options for Generic Safety Issue 191 (GSI-191)	4641403	Within six months of establishing a final determination of the scope of insulation replacement or remediation (if required), Luminant Generation Company LLC (Luminant) will submit a final updated supplemental response to support closure of GL 2004-02 for Comanche Peak. If no modifications are required, the submittal will be made three months after the NRC approval of the PWR Owners Group (PWROG) testing programs for in-vessel effects and completion of the final bypass test reports.	Open. The PWROG testing programs for in-vessel effects are scheduled to be submitted to the NRC staff for review by December 2014. The NRC staff safety evaluation is expected to be issued by December 2015. If no plant modifications are required, Luminant will make the submittal within three months of the NRC approval. If plant modifications are required, Luminant will make the submittal within six months of establishing a final determination of the scope of insulation replacement. Hence, the commitment is still open and the final closure is expected by December 1, 2015.
		4641431	Luminant will update the current licensing basis (UFSAR) following NRC acceptance of the updated supplemental response for Comanche Peak and completion of any identified removal or modification of insulation debris sources in containment per plant modification procedures and processes in accordance with 10 CFR 50.71(e).	Open. The closure of this commitment is based on closure of Commitment No. 4641403. Luminant revised the completion date as follows: February 1, 2016 (if no plant modifications are required). February 1, 2017 (if insulation removal is required).
NRC Letter dated October 18, 2012 (ADAMS Accession No. ML12263A036)	License Amendment Request (LAR) for Changes to Technical Specifications 5.5.9 and 5.6.9 - Alternate Steam Generator Repair Criteria	4356629	Luminant commits to monitor for tube slippage as implementation of Amendment part of the steam generator tube inspection program. Slippage monitoring will occur for each inspection of the Comanche Peak Unit 2 steam generators.	Closed. Section 6.1.6 was added to Procedure NDE 7.1.0 "CPNPP [Comanche Peak Nuclear Power Plant] Nondestructive Examination Program Manual" to monitor for Tube slippage as part of Steam Generator Inspection Program. In addition, Section 6.1.22 was added to Procedure NDE 7.13, "CPNPP nondestructive Examination Program Manual" as an essential element for developing degradation assessment associated with steam generators.

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		4356619	For the condition monitoring (CM) assessment, the component of operational leakage from the prior cycle from below the H* distance will be multiplied by a factor of 3.16 and added to the total accident leakage from any other source and compared to the allowable accident induced leakage limit. For the operational assessment (OA), the difference in the leakage between the allowed accident induced leakage and the accident induced leakage from sources other than the tubesheet expansion region will be divided by 3.16 and compared to the observed operational leakage. An administrative limit will be established to not exceed the calculated value.	<p>Closed. The commitment was closed, but the Electronic Commitment Tracking System (ECTS) database did not recognize the procedures which incorporated the commitment. Luminant wrote a Condition Report (CR) 2014-007691 on July 1, 2014 to correct the database. Procedure NDE 7.14, "Non Destructive Examination Program Manual" was revised to incorporate the commitment. Specifically Section 6.1.1.1 was added to state, "Obtain operational leakage for current cycle from procedure COP-732 (Ref 3.8). Conservatively assign all leakage to be from below H* elevation."</p> <p>Procedure number COP-732, "Chemistry Operating Procedures Manual" Section 4.1 was also updated to include the commitment.</p>
NRC Letter October 22, 2012 (ADAMS Accession No. ML12296A937)	Confirmatory Action Letter (4-12-004) – Comanche Peak Nuclear Power Plant, Units 1 and 2, Commitments Regarding Spent Fuel Pool Storage Practices	4494908 (Stated as Commitment No. 1 in the Letter)	Any discharged fuel irradiated under up-rate power conditions from Unit 2 Cycle 13 and later and Unit 1 Cycle 16 and later, will be restricted to storage in the Region I storage racks until the NRC approves a license amendment revising Technical Specification 3.7.17, "Spent Fuel Storage," authorizing storage in Region II storage racks.	<p>Closed. The commitment was incorporated in to the following procedures:</p> <p>Procedure No. NUC-211, "SFP Storage Limitations for Reactivity Control" and Procedure No. RFO-106, "Development and Implementation of Fuel Shuffle Sequence Plans." Hence, following the revision to the plant procedures, the commitment was closed. Luminant submitted the revised spent fuel criticality analysis license amendment request (LAR) for storage of the uprated fuel in Region II of the pool by letter dated March 28, 2013 (ADAMS Accession No. ML13095A023) and the LAR was approved by the NRC on July 1, 2014 (ADAMS Accession No. ML14160A035). Hence, all the actions associated with this commitment are complete.</p>

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		4494910 (Stated as Commitment No.2 in the Letter)	Luminant will retain the Region II spent fuel storage racks in both spent fuel pools 1 and 2 in the current as-loaded configuration as of October 11, 2012 for both fuel assemblies and fuel assembly inserts (excluding thimble plugging devices). If configuration changes are required, plans for the changes will be communicated to the NRC Region IV Regional Administrator in advance.	Closed. Luminant revised Procedure No. RFO-106, "Development and Implementation of Fuel Shuffle Sequence Plans," to incorporate the commitment. The commitment was closed after it was incorporate in to the Procedure.
		4494911 (Stated as Commitment No. 3 in the Letter)	Luminant will prepare and submit a license amendment to revise Technical Specification 3.7.17, "Spent Fuel Assembly Storage" with the current spent fuel pool configurations with fuel discharged from reactor operation at up-rate conditions (3612 Megawatt Thermal). The schedule for submittal of this license amendment is January 15, 2013.	Closed. Luminant submitted the LAR by letter dated January 15, 2013 (ADAMS Accession No. ML13032A240) to address the existing spent fuel storage configuration at the time of the submittal. Later, the licensee submitted the revised SFP criticality analysis by letter dated March 28, 2013 for approval of spent fuel storage configurations in Region II of the pool and the LAR dated January 15, 2013 was withdrawn.
		4408996 (Stated as Commitment No. 4 in the Letter)	Luminant will maintain Spent Fuel Pool boron concentration at or above 2400 ppm, above that required for operability as allowed in Technical Specification 3.7.16, "Fuel Storage Pool Boron Concentration" (2000 ppm).	Closed. The following documents were revised to incorporate this commitment: <ul style="list-style-type: none"> • Procedure No. CHM-120, "Primary Chemistry." • Procedure No. RFO-102, "Refueling Operations." • Procedure No. SOP-506, "Spent Fuel Pool Cooling and Cleanup System." • Procedure No. ODA-308, "LCO Tracking Program, "Following data sheets were revised: <ul style="list-style-type: none"> ODA-308-3.7.16 ODA-308-3.9.1 <p>Data sheet ODA-308-3.9.0 was also supposed to be revised to incorporate the commitment, but was missed. CR-2014-007707 was generated on July 1, 2014 to incorporate the commitment in to data sheet ODA-308-3.9.0.</p>

Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
TXX-11043, Dated March 31, 2011 (ADAMS Accession No. ML110940055)	Request for Review and Approval of Cyber Security Plan	3834209	Implement all cyber security related modifications (outage and non-outage) and enter the maintenance phase of the NRC approved Cyber Security Program by March 31, 2015.	Open. All plant modifications were originally scheduled to be completed by March 31, 2015. However, Luminant has requested an extension to the final implementation date to June 30, 2017 by letter dated November 21, 2013 (ADAMS Accession No. ML13338A436) and commitment date to enter the maintenance phase will be revised after the amendment request is approved.
TXX-12149, dated October 11, 2012 (ADAMS Accession No. ML12312A157)	Application for Order Approving Indirect and Internal Transfer of Licenses	4484874	Luminant Holding Company LLC, the parent company of Luminant Power, provided Luminant Power with a support agreement in the amount of \$250 million in 2007. In connection with the proposed transaction, Luminant Power proposes to increase the amount available under this support agreement to \$300 million, which provides a source of funding in an amount that is adequate to fund approximately one year's worth of the average projected expense for the fixed operations and maintenance (O&M) of CPNPP.	Closed. Luminant submitted the support agreement between Luminant Holding Company and Luminant Generation company dated April 15, 2013.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
NRC Letters dated September 18, 2013 (ADAMS Accession No. ML13232A143 and Luminant Letter TXX-13156, dated October 24, 2013 (ADAMS Accession No. ML13308B905)	LAR for Revision to TS 3.8.1 for Two 14-Day Completion Times for Offsite Circuits	4441997	<p><i>Commitments Associated with the 138kV Work</i></p> <p>During a 14-day Completion Time (CT), the Alternate Power Diesel Generator (APDG) provided for each Unit will be verified available to provide power to equipment for long term cooling once per shift.</p>	<p>Closed. Luminant issued the following training procedures in support of this commitment:</p> <ul style="list-style-type: none"> • MD01.FDA.APG, "Alternate Power Generator Refueling JIT [Just in-Time Training]" • MR01.FDA.XIA, "XST1A Transformer Modification JIT," • OPD1.C13.IR4, "Cycle 13-3 Design Modifications and Current Events." • OPD1.D13.IR4, "Cycle 13-4 Design Modifications and Current Events." • POB4APGEG2, "Auxiliary Power Generators." • Defense in Depth Contingency Plan DIDCP No. XST-01, "Loss of Offsite Power and Station Blackout during XST1 Maintenance." <p>Part of the modification was implemented. However, the licensee ended up cutting the wrong cable during implementation and had to abandon the rest of the modification on October 22, 2013. The NRC staff approval for extension of LCO 3.8.1 expired on March 31, 2014. Luminant has submitted a new LAR dated July 1, 2014 (ADAMS Accession No. ML14192A338 for completing rest of the modification. Hence, the commitment has been closed.</p>
		4456419	During a 14-day CT, if an APDG becomes unavailable, both units shall enter Condition C of TS 3.8.1 and start shutting down within 24 hours. (This 24-hour period will only be allowed once within a 14-day CT).	<p>Closed. Same as Commitment No. 4456419.</p>
		4442002	Prior to initiation of a one time, 14-day CT extension, preventive maintenance (PM) task for breakers 1EA1-1, 1EA2-1, 2EA1-1 and 2EA2-2 will be verified as current.	<p>Closed. Same as Commitment No. 4456419.</p>

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4442007	Testing of Emergency Diesel Generators (EDGs), APDGs, and Turbine-Driven Auxiliary Feedwater Pumps(TDAFWPs) will occur within the two (2) weeks prior to the start of the XST1 CT.	Closed. Same as Commitment No. 4456419.
		4442008	The EDGs, APDGs, TDAFWPs, XST2, Component Cooling Water Pump (CCWPs), and Station Service Water Pumps (SSWPs) will have ALL testing and maintenance activities suspended for the duration of a one-time, 14-day CT for XST1. Additionally, signs will be placed on the doorways to the equipment, or in the case of XST2 around the equipment, noting the restriction of testing and maintenance during this XST1 CT.	Closed. Same as Commitment No. 4456419.
		4442010	A roving hourly fire watch will be in effect during the 14-day XST1 CT along the path of the XST2 power and control cabling. This is an additional measure to monitor the area for fires that could damage and disable the XST2 transformer cabling.	Closed. Same as Commitment No. 4456419.
		4442011	Local weather conditions and forecasts will be monitored by Operations twice per shift to assess potential impacts on plant conditions.	Closed. Same as Commitment No. 4456419.
		4442013	A time in which severe weather is not expected will be selected for implementation of the XST1 CT. Based on historical information; this time frame is September 1 through March 31. This planned timing will reduce high wind/tornados and weather challenges to the plant during the XST1 CT.	Closed. Same as Commitment No. 4456419.
		4442016	The seismic walkdown will be completed prior to the XST1 CT to identify any issues that could impact the EDGs and TDAFWPs during a seismic event. These impacts include mounting or interactions issues including loose parts and missing hardware. This walkdown is for assurance that these components will meet their seismic design criteria in the event of a seismic incident.	Closed. Same as Commitment No. 4456419.
		4442028	Access to both switchyards and relay houses will be controlled and posted, and all maintenance will be suspended for the duration of the CT on XST1.	Closed. Same as Commitment No. 4456419.
		4442046	CPNPP's Operations Department will contact the Transmission Operator (Transmission Grid Controller) once per day during a 14-day Completion Time to ensure no problems exist in the transmission lines feeding CPNPP or their associated switchyards that would cause post trip switchyard voltages to exceed the voltage required by STA-629.	Closed. Same as Commitment No. 4456419.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4442047	Just-in-time training for affected work groups will be completed prior to the start of a XST1 outage.	Closed. Same as Commitment No. 4456419.
		4442049	All hot work activities along the routing associated with power and control cabling for XST2, the in-service ST, will be suspended during the XST1 CT. This is to reduce the likelihood of fires that could damage and thus disable the XST2 transformer cabling.	Closed. Same as Commitment No. 4456419.
		4456879	In the two weeks prior to the start of the CT, a thermographic survey will be conducted on the two fixed sources in the safeguards switchgear room to verify no abnormalities exist. This is to reduce the likelihood of a fire ignition.	Closed. Same as Commitment No. 4456419.
		4457002	Both Unit 1 and 2 Transient Combustible safe zones that are associated with the cable routing for the XST2 transformer will have additional restrictions relating to combustible storage during the extended CT durations. Implementing this mitigation measure will reduce the likelihood of fires related to the XST2 transformer.	Closed. Same as Commitment No. 4456419.
		Commitments Associated With The 6.9kV Work		
		4457004	During a 14-day CT, the APDG provided for each Unit will be verified available to provide power to equipment for long term cooling once per shift.	Closed. Same as Commitment No. 4456419.
		4457005	During a 14-day CT, if an APDG becomes unavailable, the affected Unit shall enter Condition C of TS 3.8.1 and comply with the Required Actions. If the CT for the Condition C Required Actions is not met, then Condition G of TS 3.8.1 shall be entered. This allowance will only be exercised once within a 14-day CT for a given Unit. For any second, or subsequent, unavailability of an APDG for a given Unit, the affected Unit shall immediately enter TS 3.0.3. In all cases, the normal rules governing application of TSs in section 1.0 of the CPNPP TSs shall apply (Revised by Luminant letter dated October 24, 2013).	Closed. Same as Commitment No. 4456419.
		4457007	Prior to initiation of the one time, two CT extensions, PM task for breakers 1EA1-1, 1EA2-1, 2EA1-1 and 2EA2-2 will be verified as current.	Closed. Same as Commitment No. 4456419.
		4457008	Testing of EDGs, APDGs, and TDAFWPs will occur within the two (2) weeks prior to the start of the XST1 CT.	Closed. Same as Commitment No. 4456419.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4457016	The EDGs, APDGs, TDAFWPs, XST2, CCWPs, and SSWPs will have ALL testing and maintenance activities suspended for the duration of a one-time, 14-day CT for XST1. Additionally, signs will be placed on the doorways to the equipment, or in the case of XST2 around the equipment, noting the restriction of testing and maintenance during this XST1 CT.	Closed. Same as Commitment No. 4456419.
		4457030	A roving hourly fire watch will be in effect during the 14-day XST1 CT along the path of the XST2 power and control cabling. This is an additional measure to monitor the area for fires that could damage and disable the XST2 transformer cabling.	Closed. Same as Commitment No. 4456419.
		4457033	Local weather conditions and forecasts will be monitored by Operations twice per shift to assess potential impacts on plant conditions.	Closed. Same as Commitment No. 4456419.
		4457041	A time in which severe weather is not expected will be selected for implementation of the XST1 CT. Based on historical information; this time frame is September 1 through March 31. This planned timing will reduce high wind/tornados and weather challenges to the plant during the XST1 CT.	Closed. Same as Commitment No. 4456419.
		4457044	The seismic walkdown will be completed prior to the XST1 CT to identify any issues that could impact the EDGs and TDAFWPs during a seismic event. These impacts include mounting or interactions issues including loose parts and missing hardware. This walkdown is for assurance that these components will meet their seismic design criteria in the event of a seismic incident.	Closed. Same as Commitment No. 4456419.
		4457119	Access to both switchyards and relay houses will be controlled and posted, and all maintenance will be suspended for the duration of the CT on XST1.	Closed. Same as Commitment No. 4456419.
		4457121	CPNPP's Operations Department will contact the Transmission Operator (Transmission Grid Controller) once per day during a 14-day Completion Time to ensure no problems exist in the transmission lines feeding CPNPP or their associated switchyards that would cause post trip switchyard voltages to exceed the voltage required by STA-629.	Closed. Same as Commitment No. 4456419.
		4457122	Just-in-time training for affected work groups will be completed prior to the start of a XST1 outage.	Closed. Same as Commitment No. 4456419.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4457123	All hot work activities along the routing associated with power and control cabling for XST2, the in-service ST, will be suspended during the XST1 CT. This is to reduce the likelihood of fires that could damage and thus disable the XST2 transformer cabling.	Closed. Same as Commitment No. 4456419.
		4457124	In the two weeks prior to the start of the CT, a thermographic survey will be conducted on the two fixed sources in the safeguards switchgear room to verify no abnormalities exist. This is to reduce the likelihood of a fire ignition.	Closed. Same as Commitment No. 4456419.
		4457125	Both Unit 1 and 2 Transient Combustible safe zones that are associated with the cable routing for the XST2 transformer will have additional restrictions relating to combustible storage during the extended CT durations. Implementing this mitigation measure will reduce the likelihood of fires related to the XST2 transformer.	Closed. Same as Commitment No. 4456419.
TXX-12146, dated October 18, 2012 (ADAMS Accession No. ML12310A058)	30-Day Report for Significant Change in Peak Clad Temperature	4496945	The peaking factor burndown used in the fuel pellet thermal conductivity evaluation will be added to the Reload Safety Analysis Checklist for validation as part of the reload design process.	Open. Waiting for NRC to approve new ECCS evaluation model.
		4496966	Luminant will submit to the NRC, for review and approval, a Large Break Loss-of-Coolant Accident (LBLOCA) analysis that applies NRC-approved methods that include the effects of fuel pellet thermal conductivity.	Open. Waiting for NRC to approve new ECCS evaluation model
TXX-13169, dated November 26, 2013 (ADAMS Accession No. ML13346A175)	Spent Fuel Pool Criticality Analysis - LAR to Revise TSs 3.7.16, 3.7.17, 4.3, AND 5.5	4753383	The BORAL Monitoring Program ensures that: (a) future coupons removed for testing are reinserted into the spent fuel pool (SFP) after testing is complete, (b) location and move times are tracked for the samples (to enable demonstration of the total duration that test coupons were removed from the pool environment), and (c) includes a requirement to perform continual testing every 10 years as long as the Region I storage racks are licensed to store fuel.	Open. The commitments are associated with implementation of the LAR for revised spent fuel pool criticality analysis approved by the NRC staff by letter dated July 1, 2014 (ADAMS Accession No. ML14192A338). The licensee is expected to implement the LAR during fall Unit 1 refueling outage.
		4753402	BORAL is credited in the Region I racks for both the borated and non-borated cases. The BACKGROUND section of the TS Bases B 3.7.16, 4th paragraph, 1st sentence will be changed to state: "In order to maintain keff less than or equal to 0.95, the presence of fuel pool soluble boron is credited for the storage of fuel assemblies within the Region I and Region II racks (in addition to the BORAL neutron absorber material in Region I)."	Open. Same as Commitment No. 4760732.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4753403	The supporting Criticality Safety Analysis demonstrated Keff remains LESS THAN 1.0 for all analyzed conditions (reference WCAP-17728-P Rev 1 section 2.1.1). The BACKGROUND section of the TS Bases B 3.7.16, 3rd paragraph, last sentence will be changed to state: "The neutron absorber material BORAL is credited for the storage of spent fuel assemblies within the Region I racks to maintain Keff less than 1.0 at 0 ppm soluble boron concentration."	Open. Same as Commitment No. 4760732.
TXX-13182, dated December 17, 2013 (ADAMS Accession No. ML14016A131)	LAR Spent Fuel Pool Criticality Analysis – Response to Requests for Additional Information Round 2	4760732	Current and future fuel assemblies will use a Wet Annular Burnable Absorber (WABA) which is no more than 120 inches in length and 95/95 Upper Bound fuel theoretical density (%TD) will be < 96.5%. Future fuel cycles will utilize a Maximum Inlet Temperature of < 561.7 degrees F. If these parameters are not met, the fuel assemblies will be treated as fresh fuel for storage in the Spent Fuel Pools.	Open. The commitments are associated with implementation of the LAR for revised spent fuel pool criticality analysis approved by the NRC staff by letter dated July 1, 2014 (ADAMS Accession No. ML14192A338). The licensee is expected to implement the LAR during fall Unit 1 refueling outage.
		4760737	CPNPP will review the calculated B-10 concentration in the RCS each refueling outage (after borating to >2400 ppm, but not including the fill of the Refueling Cavity). If the calculated value is below 0.194 atom fraction, a B-10 measurement will be performed on the Spent Fuel Pool after adequate mixing time has occurred, but prior to the next refueling outage to ensure the B-10 value in the SFP has not significantly changed.	Open. Same as Commitment No. 4760732.
		4760738	CPNPP will review the SFP Boron Measurement history each refueling outage. If the SFP boron values have experienced any increase of more than 100 ppm, a review of B-10 values for Boric Acid purchased at CPNPP will be performed. If this review demonstrates that boric acid has been purchased which has a B-10 atom fraction below 0.194, a B-10 measurement will be performed on the Spent Fuel Pool prior to the next refueling outage to ensure the B-10 value in the SFP has not significantly changed.	Open. Same as Commitment No. 4760732.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4760741	For fuel assemblies which are classified as outlier assemblies solely due to Hot Full Power (HFP) Rodded Operation, burnup which is accrued during HFP rodded conditions will not be credited in the Technical specification Surveillance, but all other burnup accrued during the cycle will be credited. The administrative controls and Configuration Confirmation Software tools described in Enclosure 1 of LAR 13-01 will incorporate limitations to ensure that the appropriate burnup is credited for fuel assemblies which have experienced HFP Rodded Operation beyond the low threshold required by the area of applicability.	Open. Same as Commitment No. 4760732.
TXX-12089, dated June 7, 2012 (ADAMS Accession No. ML12167A242)	90-Day Response to March 12, 2012 Information Request Regarding Recommendation 9.3 of Near-Term Task Force (NTTF)	4414380	Emergency Response Organization (ERO) self-activation expectations will be included in the 2012 ERO annual requalification training given to all ERO personnel.	Closed. The training slides for Procedure EP38.ERO.EP1, dated 11/08/2012, describe the self activation expectations and have been incorporated in to the procedure..
		4414400	To assist the ability of augmentation staff to reach the site, CPNPP is revising the existing letter of agreement (LOA) with the Texas Department of Public Safety (TXDPS) specifically to obtain logistical support for the transport of emergency responders to the site in the event of a large-scale natural disaster that inhibits site access.	Closed. By letter dated June 6, 2012 TXDPS agreed to assist CPNPP augmentation staff in reaching the site in the event of a large scale natural disaster which inhibits site access by assistance with logistical support. Luminant did not have possession of the letter from TXDPS at the time of the commitment.
TXX-12096, dated June 5, 2012 (ADAMS Accession No. (ML12177A055)	Review of 60-Day Response to Request for Information Regarding Recommendation 9.3 of the NTTF (Near Term Task Force)	4392894	Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described.	Closed. The requested information was provided by the licensee by letter dated October 31, 2012 (ADAMS Accession No. ML12318A100).
		4392918	Provide an implementation schedule of the time needed to conduct and implement the results of the communications assessment.	Closed. Same as Commitment No. 4392894.
		4392919	Conduct and provide results for an onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment for Staffing Request 1]	Closed. ECTS database indicates letter dated April 30, 2013 (ADAMS Accession No. ML13128A07) closed it. However, letter dated April 30, 2013 does not state what commitments were closed. It also does not reference the letter dated June 5, 2012, which made the commitment.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4392932	Conduct and provide results for an onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment for Staffing Request 1]	Open. The commitment was originally scheduled to be completed by June 1, 2014. By letter dated May 15, 2014 (ADAMS Accession No. ML14143A400), the licensee changed the commitment completion date to June 1, 2015 .
		4392934	Provide a schedule of the time needed to implement changes associated with the Phase 1 staffing assessment [for Staffing Request 2].	Closed. Database indicates letter dated April 30, 2013 (ADAMS Accession No. ML13128A07) closed it. However, letter dated April 30, 2013 does not state what commitments were closed. It also does not reference the letter dated June 5, 2012, which made the commitment.
		4392952	Provide a schedule of the time needed to implement changes associated with the Phase 2 staffing assessment. [for Staffing Request 2]	Open. The commitment was originally scheduled to be completed by June 1, 2014. By letter dated May 15, 2014 , (ADAMS Accession No. ML14143A400) the licensee changed the commitment completion date to June 1, 2015.
		4392954	Identify changes associated with the Phase 1 staffing assessment that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers [for Staffing Request 6].	Closed. Database indicates letter dated April 30, 2013 (ADAMS Accession No. ML13128A07) closed it. However, letter dated April 30, 2013 does not state what commitments were closed. It also does not reference the letter dated June 5, 2012, which made the commitment.
		4392956	Identify changes associated with the Phase 2 staffing assessment that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers [for Staffing Request 6].	Open. The commitment was originally scheduled to be completed by June 1, 2014. By letter dated May 15, 2014 , (ADAMS Accession No. ML14143A400) the licensee changed the commitment completion date to June 1, 2015.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
TXX-12108, dated July 10, 2012 (ADAMS Accession No. ML12201A095)	120-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.3 of the NTTF Review of the NTTF	4430943	Luminant confirms that it will use the seismic walkdown guidance (EPRI [Electric Power Research Institute] 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic") as endorsed by Reference 2 to conduct the walkdowns and develop the needed information at CPNPP.	Closed. The licensee submitted seismic walkdown report and confirmed that walkdowns were performed consistent with NRC-endorsed EPRI guidance by letter dated November 27, 2012 (ADAMS Accession No. ML12340A433). However, the letter did not make a reference to the original commitment and did not clearly state that it closed the commitment. In addition, the licensee was unable to complete walkdowns for some of the inaccessible areas for Unit 1 and made a new commitment (Commitment No. 4527482) to complete rest of the walkdowns by June 30, 2013.
TXX-12178 and TXX-13105, dated November 27, 2012 and July 1, 2013 (ADAMS Accession Nos. ML13009A269 and ML13129A179)	120-Day Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.3 of the NTTF Review of the NTTF	4527482	Luminant will complete the seismic walkdowns for CPNPP Unit 1 during 1FR16 in the Spring of 2013 and submit a supplemental report by June 30, 2013.	Closed. The licensee submitted the final walkdown report for the inaccessible areas for Unit 1 by letter dated July 1, 2013 (ADAMS Accession No. ML13192A179).
TXX-13081, dated April 30, 2013 (ADAMS Accession No. ML13128A077)	Response to March 12, 2012 Request for Information Pursuant to 10 CFR 54(f) Regarding Recommendations of the NTTF	4630659	Integrate the expanded response capability into existing augmented Emergency Response Organization (ERO) processes (i.e., the ability to transition from a single-unit to a multi-unit expanded response capability).	Open. The commitment is scheduled for completion by October 31, 2014.
		4630672	Develop plans/procedures that address the use of expanded response capability in the on-site/near-site primary and alternate emergency response facilities (e.g., OSC and TSC) for declared emergency events that involve more than one-unit at multi-unit sites. This should include the relocation of expanded response capability to the alternate emergency response facility, should the primary emergency response facility be rendered inoperable.	Open. The commitment is scheduled for completion by October 31, 2014.

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
		4630681	Identify and Integrate into the ERO notification/activation protocol those non-ERO response personnel (e.g., Operations and Maintenance) necessary to support expanded response capability functions.	Open. The commitment was scheduled for completion by December 31, 2013. The commitment completion date was changed to May 22, 2014 by the licensee. Emergency Planning (EP) department concludes that CPNPP employs "all-call, all come" approach to ERO response and there was no need to make this commitment and commitment should be closed. However, operations department concludes that the commitment is valid and should be incorporated in to the plant procedures. CRs 2014-007478 and 2014-007889 were generated on June 24 and July 3, 2014, respectively to resolve the concerns by operations. The licensee is in the process of performing an evaluation to determine the need and status of the commitment.
TXX-14067, dated May 15, 2014 (ADAMS Accession No. ML14143A400)	60-Day Revised Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding	4392932	Conduct and provide results for an onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment for Staffing Request 1]	Open. The licensee changed the completion date to 4 months prior to beginning of 2RF15 refueling outage (estimated June 2015).
	Recommendation 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of the Insights from the Fukushima Dai-Ichi Accident, Dated March 12, 2012	4392952	Provide a schedule of the time needed to implement changes associated with the Phase 2 staffing assessment [for Staffing Request 2]	Open. The licensee changed the completion date to 4 months prior to beginning of 2RF15 refueling outage (estimated June 2015).
		4392956	Identify changes associated with the Phase 2 staffing assessment that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers [for Staffing Request 6]	Open. The licensee changed the completion date to 4 months prior to beginning of 2RF15 refueling outage (estimated June 2015).

Letter No.	Subject	Commitment No.	Description of Commitments	Implementation Status
TXX-14061, dated May 1, 2014 (ADAMS Accession No. ML14136A027)	LAR 13-01 Spent Fuel Criticality analysis, supplemental information to requests for additional information	4844167	Following implementation of the PETRIFIED software, Luminant Power will operationally verify (independent of PETRIFIED calculations) the TS 3.7.17 categorization calculations for fuel discharged from Unit 2 Cycle 14 and Unit 1 Cycle 17 prior to storing these assemblies in Region II. CPNPP will further operationally verify (independent of PETRIFIED) fuel movement plans which impact Region II during 2014, to ensure the allowed configurations of TS 3.7.17 are maintained. Fuel movement plans which impact Region II include movement of fuel into Region II as well as fuel movement within Region II (reconfiguration). These operational verification activities will be performed by an individual independent of the software developer and the developer of the initial PETRIFIED test plan, but maintains at least the same level of qualification.	Open. The commitments are associated with implementation of the LAR for revised spent fuel pool criticality analysis approved by the NRC staff by letter dated July 1 2014 (ADAMS Accession No. ML14192A338). The licensee is expected to implement the LAR during fall Unit 1 refueling outage.

R. Flores

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The NRC staff appreciates the resources that were made available by your staff, both before and during the audit. If there are any questions, I can be contacted at (301) 415-3016.

Sincerely,

/RA/

Balwant K. Singal, Senior Project Manager
Plant Licensing Branch IV-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

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