



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

October 9, 2014

Mr. Dennis L. Koehl
President and CEO/CNO
STP Nuclear Operating Company
South Texas Project
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT, UNITS 1 AND 2 – AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS. MF3372
AND MF3373)

Dear Mr. Koehl:

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

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

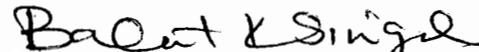
An audit of South Texas Project (STP), Units 1 and 2, commitment management program was performed at the plant site on August 18-19, 2014. The NRC staff concludes, based on the audit, that STP Nuclear Operating Company (the licensee) has implemented NRC commitments on a timely basis and has implemented an effective program for managing NRC commitment changes. The details of the results of the audit including the NRC staff's observations and recommendations are set forth in the enclosed audit report.

D. Koehl

- 2 -

If you have any questions, please contact me at (301) 415-3016 or via e-mail at Balwant.Singal@nrc.gov.

Sincerely,


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

Docket Nos. 50-498 and 50-499

Enclosure:
Audit Report

cc w/encl: Distribution via Listserv



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

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

STP NUCLEAR OPERATING COMPANY

SOUTH TEXAS PROJECT, UNITS 1 AND 2

DOCKET NOS. 50-498 AND 50-499

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), 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 (ADAMS Accession No. ML003741774) 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 regulatory commitments, are being effectively implemented. An audit of the South Texas Project (STP), Units 1 and 2, commitment management program was performed at the plant site on August 18-19, 2014. The audit reviewed commitments made since the previous audit on July 19-20, 2011, which was documented in an audit report dated September 7, 2011 (ADAMS Accession No. ML112210658).

NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.).

2.0 AUDIT PROCEDURE AND RESULTS

The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, (2) verification of the licensee's program for

Enclosure

managing changes to NRC commitments, and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation. The audit also verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Commitments made in Licensee Event Reports or in response to Notices of Violation may be included in the sample, but the review will be limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched 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 and Technical Specifications (TSs). Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The attached Summary of Audit of Regulatory Commitments and Results provides details of the audit for verification of the licensee's implementation of commitments.

STP Nuclear Operating Company (STPNOC, the licensee) has implemented Procedure OPGP05-ZN-0002, Revision 5, "Licensing Commitment Management and Administration," which

identifies the methods and responsibilities for the maintenance of commitments and the Regulatory Commitments Management Program, which is used to ensure that the commitments are properly identified, tracked, closed out, revised/changed, or deleted. The licensee uses the program to track the status and manage the closure of commitments at STP effectively. The licensee's Procedure OPGP05-ZN-0002 is consistent with the guidance provided by NEI 99-04.

As discussed above, the licensee's program provides acceptable tools and guidance for the licensee to capture the NRC guidance on commitment management programs. The licensee enters the commitments made to the NRC into the program. The commitments are entered as Condition Record (CRs) in the Corrective Action Program Database (CAPD). The field for "Action Type" in the CR further identifies the CR as a regulatory commitment for the purposes of tracking. The status of the commitments, implementation dates, target implementation document information associated with each specific commitment, and comments are captured in the program.

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

The NRC staff's audit was intended to confirm that the licensee has documented its implementation of 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.

During the audit of the licensee's commitment management program, NRC found that all reviewed commitments were correctly entered in CAPD as a regulatory action item. The NRC staff also identified deficiencies, including failure to incorporate the NRC commitment identifier into target documents (e.g., procedures) in accordance with Procedure OPAP01-ZA-0101. In two cases, a CR was made to incorporate the missed NRC commitment identifier but the schedule for completing the corrective actions in the CR was not timely.

More specifically, the NRC staff's audit identified the following deficiencies (refer to the attached table to this report using the CR number for a description of each individual CR):

- CR 12-11657-22: The commitment was incorporated into a procedure without the NRC commitment identifier in accordance with the licensee's Procedure OPAP01-ZA-0101. CRs 14-13498-1 and 14-13498-3 were created as a result but both due dates for completing the corrective actions were not timely.
- CR 12-11657-23: The commitment was incorporated into Procedure OPOP01-ZA-0001 without NRC commitment identifier in accordance with the licensee's Procedure OPAP01-ZA-0101. The licensee had corrected the error ahead of the commitment audit.

- CR 12-11657-15: The commitment was incorporated into Procedure OPGP05-ZV-0003 without NRC commitment identifier in accordance with the licensee's Procedure OPAP01-ZA-0101. Also, review of the most recent procedure indicated the reference to the source of commitment was deleted in a later revision. The licensee created CR 14-14177 to correct the errors.

The results of the review indicated that the commitments were implemented and/or incorporated satisfactorily and the licensee has an effective commitment management program, with the exception of the deficiencies noted above. The deficiencies identified above had no safety significance and the licensee created condition records to correct the deficiencies.

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 the guidance of NEI 99-04. The discrepancies identified by the NRC staff are minor in nature and do not have any safety significance.

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 STP, Units 1 and 2, is contained in Procedure OPGP05-ZN-0002, Revision 5. The audit reviewed a sample of commitment changes that included changes requiring NRC approval. 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

The NRC staff found that changes to the commitments are processed through the STPNOC Regulatory Commitment Change Process, which is consistent with the guidance in NEI 99-04. The licensee provided NRC the Commitment Change Summary Report for the period from June 21, 2011, to June 21, 2013, submitted to the NRC by letter dated July 18, 2013 (ADAMS Accession No ML13219B119). According to the report, two commitments have been changed since the last audit. Commitments with minor changes (e.g. change to the implementation date) were not included in the Commitment Change Summary Report. For commitments with minor changes, licensee generated a Commitment Evaluation Form in accordance with the plant procedures and the review by NRC concluded that the justifications provided by the licensee were adequate.

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.

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

As per the guidance of LIC-105, the NRC staff reviewed all the safety evaluations (SEs) and safety assessments since the last commitment audit, including the review of the commitments selected for the audit, to ensure none of the commitments has 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 in an NRC SE 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).

In addition to the commitments selected for the audit sample, all SEs for license amendments, exemptions, and relief requests issued by the NRC staff associated with the commitments were reviewed to determine if they contained any misapplied commitments as described above.

By letter dated November 11, 2011 (ADAMS Accession No. ML112440222), the NRC issued Amendment Nos. 198 and 186 to STP, Units 1 and 2, respectively. In the SE associated with the amendments, NRC staff appeared to rely on the commitments related to the fuel cladding material. Further review indicated that the commitments originated from the SE of the Westinghouse Topical Report WCAP-12610-P-A and CENPD-404-P-A, "Optimized ZIRLO," Section 5.0, "Conditions and Limitations," dated June 10, 2005 (ADAMS Accession No. ML051670408). Amendment Nos. 198 and 186 modified TS 6.9.1.3, "Core Operating Limits Report (COLR)," to include a reference to the NRC-approved WCAP-12610-P-A, thus the commitments relied upon in the SE are incorporated into the STP, Units 1 and 2 Technical Specifications and are not misapplied.

Based on the NRC staff review of the SEs 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.

3.0 OBSERVATIONS AND RECOMMENDATIONS

Deficiencies in the commitment management program identified during the NRC audit are identified in Section 2.1.2 of this report. These deficiencies had no safety significance and at the conclusion of the audit, the licensee was in the process of correcting the deficiencies.

However, based on the NRC staff's review, the NRC staff identified a weakness in the licensee's commitment management program. A number of cases, as already described in

Section 2.1.2, "Audit Results," were identified during the audit, where the licensee failed to reference the source of the commitment in the target document as required by Procedure OPAP01-ZA-0101 to avoid inadvertent deletion of the commitment in a future revision without adequate review. The NRC staff recommends that the licensee should take appropriate action to avoid such recurrences.

4.0 CONCLUSION

Based on the results of the audit, the NRC staff concludes that the licensee has implemented the commitment management program effectively, and implemented commitment changes appropriately consistent with NEI 99-04. The licensee generated CRs to correct the deficiencies identified during the audit. The deficiencies identified during the audit did not have any safety significance.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Marilyn Kistler
Lance Sterling

Principal Contributors: Margaret M. Watford
Balwant K. Singal

Date: October 9, 2014

Attachment:
Summary of Audit of Regulatory
Commitments and Results of Audit

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NOC-AE-13003039, dated October 3, 2013 (ADAMS Accession No. ML13295A222)	Corrections to Revised South Texas Project (STP) Pilot Submittal and Requests for Exemptions and License Amendment Request (LAR) for a Risk-Informed Approach to Resolving Generic Safety Issue (GSI)-191	CR 13-10732-18	STP Nuclear Operating Company (STPNOC) discovered that the description of the CASA Grande analysis in Enclosure 4-3 of NOC-AE-1 3002986 did not match the actual CASA Grande analysis input in some areas. Correction of several of these differences will require a re-quantification of the probabilistic risk assessment (PRA) due to changes in the supporting analysis (CASA Grande). STPNOC will perform that analysis and submit a supplement to the licensing application submitted in NOC-AE-13002986 by November 15, 2013. The supplement will also include a description of the changes required to resolve the differences that were identified between the CASA Grande analysis and the description in Enclosure 4-3.	Closed. The licensee submitted the revised analysis by letter dated November 13, 2013 (ADAMS Accession No. ML13323A183).
NOC-AE-13003043, dated November 13, 2013 (ADAMS Accession No. ML13323A185)	Enclosure 3 LAR for STP Piloted Risk-Informed Approach to Closure for GSI-191	CR 11-4249-9	The STP Updated Final Safety Analysis Report (UFSAR) will be revised to include the changes provided in Attachment 2 to Enclosure 3, "Licensing Amendment Request for STP Piloted Risk-Informed Approach to Closure for GSI-1 91."	Open. The NRC staff expects to complete its review of the exemptions and the LAR by December 2015. The licensee committed to incorporate the commitment after receipt of the NRC staff approval.
NOC-AE-13002958, dated February 21, 2013 (ADAMS Accession No. ML13092A257)	Attachment 1, STPNOC Response to Request for Additional Information Regarding Recommendation 9.3 related to Communications	CR 12-11657-7	STPNOC will perform 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. The assessment will be provided to the NRC.	Closed. The communications assessment was provided in letter dated December 31, 2012 (ADAMS Accession No. ML12318A096). The commitment originated from previous letter dated June 4, 2012 (ADAMS Accession No. ML12163A344).
		CR 12-11657-8	STPNOC will provide an implementation schedule of the time needed to implement the results of the communications assessment.	Closed. Implementation schedule provided by letter dated December 31, 2012 (ADAMS Accession No. ML12318A096).

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		CR 12-11657-21	The numbers for four new handheld satellite phones will be added to the Emergency Communications Directory during the next quarterly update in March 2013.	Open. The numbers for new handheld satellite phones added to the Emergency Communications Directory, Revision 102 on March 27, 2013. Commitment No. 14-13498-2 created to revise Communications Directory to prevent the numbers from being inadvertently deleted.
		CR 12-11657-22	Two additional satellite phones will be purchased for use in the emergency operations facility (EOF) as an interim measure. These phones will be stored in the EOF, procedures will be revised to inventory and check the functionality, and their numbers added into the Emergency Communications Directory.	Open. EOF Procedure OPGP05-ZV-0014, Revision 12 incorporated the commitment on March 27, 2013, without the NRC commitment identifier in accordance with OPAP01-ZA-0101. Commitment Nos. 14-13498-1 and 14-13498-3 were created to incorporate commitment identifiers in the procedure and are scheduled for completion by February 1, 2015. NRC staff believed that the schedule for completing the actions of the condition records (CRs) was not timely and recommended that the actions of the CRs be completed expeditiously.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		CR 12-11657-23	For each unit, two additional satellite phone batteries and one battery charger will be purchased for use onsite as an interim measure. These batteries and chargers will be purchased, stored in the exclusion area boundary (EAB), and procedures will be revised to inventory and check the functionality.	Closed. Commitment incorporated into Procedure OPOP01-ZA-0001 without NRC commitment identifier in accordance with OPAP01-ZA-0101 on August 6, 2014. Commitment No. 14-13475 created to include commitment identifier in Revision 43 of the procedure and the actions suggested by the CR was completed on August 6, 2014.
NOC-AE-13002989, dated April 25, 2013 (ADAMS Accession No. ML13123A028)	Response to Request for Additional Information (RAI) Regarding Recommendation 9.3 of the Near-Term Task Force (NTTF) Review of Insights from the Fukushima Dai-ichi Accident - Phase 1 Staffing Assessment	CR 12-11657-24 CR 12-11657-28	Ensure that the required number of qualified individuals are added to fill all necessary roles of the expanded emergency response organization (ERO) (Table 5-2 positions) * TSC [Technical Support Center] Technical Manager * Engineering Supervisor * Engineer - Nuclear * Engineer - Mechanical * Engineer - Electrical * Engineer - I&C [Instrumentation and Controls] * TSC Operations Communicator	Closed. ERO Roster System Report (PER0020) has been revised to incorporate the commitment.
		CR 12-11657-10	STPNOC will perform a second staffing assessment as requested by the 50.54(f) letter using Nuclear Energy Institute (NEI) 12-01 and provide the results of the assessment to the NRC (Phase 2 Assessment). STPNOC will provide the NRC with the results of the Phase 2 assessment and an implementation schedule of the time needed to implement any changes.	Open. The commitment is scheduled for completion by December 4, 2014 (4 months prior to the beginning of 2RE17 refueling outage scheduled for March 28, 2015).
		CR 12-11657-12	STPNOC will identify changes associated with the Phase 2 staffing assessment that have been made or will be made to our emergency plan regarding the on-shift or augmented staffing changes including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.) and provide this to the NRC	Open. The commitment is scheduled for completion by December 4, 2014 (4 months prior to the beginning of 2RE17 refueling outage scheduled for March 28, 2015).

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NOC-AE-13003006, dated June 19, 2013 (ADAMS Accession No. ML13191A910)	Revision to Commitment for Final Response to NRC RAI Regarding the Seismic Aspects of Recommendation 2.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident	CR 12-12304-11	Enclosure 2 to Reference 4 of this letter, STP Unit 2 Seismic Walkdown Summary Report Section 3.3, "Inaccessible Items," identified 15 items for STP Unit 2 on the seismic equipment walkdown list (SWEL) that were not sufficiently accessible to complete the walkdown inspection during normal plant operations. These items are indicated as such by a footnote in Appendix B Table B-5 "Unit 2 SWEL" indicating that the walkdowns for these items were originally planned to be completed by the end of May 2013. Because the Unit 2 refueling outage has been rescheduled, walkdowns will not be completed until the end of December 2013. Therefore, the updated final report will be submitted approximately 60 days following the completion of these walkdowns.	Closed. The licensee submitted the updated final report by letter dated February 27, 2014 (ADAMS Accession No. ML14077A279).
NOC-AE-13002962, dated July 23, 2013 (ADAMS Accession No. ML13212A243)	LAR for Approval of a Revision to the STP Fire Protection Program Related to the Alternative Shutdown Capability	CR 08-1057-39	The STP Fire Hazards Analysis Report (FHAR) will be revised to include the changes provided in Enclosure 4 to the LAR. Reference is NOC-AE- 13002962.	Open. The LAR is under review by the NRC staff and the review is expected to be completed by October 2014.
NOC-AE-12002931, dated November 27, 2012 (ADAMS Accession No. ML13003A275)	Final Response to NRC RAI Regarding the Seismic Aspects of Recommendation 2.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident	CR 12-12304-10	STPNOC will use Electric Power Research Institute (EPRI) 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic" as endorsed by the NRC to conduct the walkdowns of areas at STP Units 1 and 2 that are inaccessible and could not be completed prior to the submittal of the 180-day final response.	Closed. The original date to complete the commitment was July 31, 2013. The licensee did not follow the Commitment Change Process in accordance with Procedure OPG05-ZN-0002 to extend the commitment due date. The actions of the commitment were completed on February 27, 2014. CR 14-13896 was created on August 7, 2014, to acknowledge and determine the causes for the missed NRC commitment.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NOC-AE-12002858, dated June 4, 2012 (ADAMS Accession No. ML13025A360)	GSI-191 Resolution Path Schedule and Commitment Changes	CR 11-4249-7	Submit an LAR based on a risk-informed approach to resolve GSI-191 for STP.	Closed. The LAR for risk-informed approach to resolution of GSI-191 was submitted by letter dated June 19, 2013 (ADAMS Accession No. ML13175A211).
NOC-AE-13002952, dated January 29, 2013 (ADAMS Accession No. ML13037A107)	STPNOC Response to March 12, 2012 RAI, Enclosure 2, Recommendation 2.1, Flooding, Required Response 1, Integrated Assessment Approach	CR 12-12304-12	STPNOC will adopt the Reference 2 guidance as the approach for developing the NTTF Recommendation 2.1 Flooding Integrated Assessment Report for STP Units 1 and 2 if the reevaluated flooding hazard is not bounded by the current design basis flooding evaluation.	Open. The commitment scheduled for completion by March 12, 2015.
		CR 12-12304-13	STPNOC will also adopt the guidance provided by Reference 3 regarding the trigger conditions and scope of any required Integrated Assessment.	Open. The commitment scheduled for completion by March 12, 2015.
NRC Issuance of Amendment, dated November 17, 2011 (ADAMS Accession No. 112440222)	STP, Units 1 and 2 – Issuance of Amendments RE: Use of Optimized Zirlo Fuel Rod Cladding Material	CR 10-24696-03	Lead Test Assembly (LTA) measured data and favorable results from visual examinations of once, twice, and thrice-burned LTAs confirm, for three cycles of operation, that the current fuel performance models are applicable for Optimized ZIRLO™ clad fuel rods. Westinghouse will continue to provide additional data from the Optimized ZIRLO™ LTA programs to the NRC as it becomes available. Confirmation of the approved models' applicability up through the projected end-of-cycle burnup for the Optimized ZIRLO™ fuel rods must be completed prior to their initial batch loading and prior to the startup of subsequent cycles. Until the commitment is complete, STPNOC will confirm that, as higher burnups/fluences are achieved for Optimized ZIRLO™ clad fuel rods, the requirements of this condition are met as it applies to STP, Units 1 and 2.	Open. The additional data submitted by Westinghouse for the Optimized ZIRLO™ LTA is under review and approval by the NRC staff. Hence, the licensee extended the closure date to December 15, 2015.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		CR 10-24696-04	Data from three cycles of operation have been evaluated and the fuel rod creep models from fuel rod design codes have been used to predict growth and creep performance of the samples. This information was provided to the NRC in the most recent informational letter W LTR NRC-10-43) dated July 26, 2010. Confirmation of the approved models' applicability up through the projected end of cycle burnup for the Optimized ZIRLO™ fuel rods must be completed prior to their initial batch loading and prior to the startup of subsequent cycles. Until the commitment is complete, STPNOC will confirm that the requirements of this condition are met as it applies to STP, Units 1 and 2.	Open. Same as CR 10-24696-03 mentioned earlier.
		CR 10-24696-05	The relative differences in unirradiated strength (YS and UTS) between Optimized ZIRLO™ and standard ZIRLO™ in cladding and structural analyses will be accounted for until irradiation data for Optimized ZIRLO™ is accepted by the NRC staff. Analysis of Optimized ZIRLO™ clad fuel rods will use the yield strength and Ultimate tensile strength as modified per Conditions 8.a.i, 8.a. ii, and 8.a. iii until such time that irradiation data for Optimized ZIRLO™ strengths are collected and provided to the NRC. Until the values are accepted by the NRC, STPNOC will confirm that the requirements of this condition are met as it applies to STP, Units 1 and 2.	Open. Same as CR 10-24696-03 mentioned earlier.
NOC-AE-12002932, dated November 26, 2012 (ADAMS Accession No. ML12340A156)	Final Response to NRC RAI Regarding the Flooding Aspects of Recommendation 2.3 of the NTF Review of Insights from the Fukushima Dai-ichi Accident	CR 12-26142-30	Complete the inspections of all restricted access items as identified in the STP Units 1 & 2 Flooding Walkdown Summary Report Section III.B, under the section "Restricted Access Items."	Closed. Commitment originated as a result of CR 12-12304-9. The inspections and thus, the CR, were completed by October 21, 2013, and the letter containing the results from the walkdowns of the restricted access items submitted on March, 29, 2014 (ADAMS Accession No. ML14163A012).

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NRC Letter dated June 11, 2012 (ADAMS Accession No. ML12159A493)	Review of 60-day Response to RAls Regarding NTTF Recommendation 9.3	CR 12-11657-7	STPNOC will perform 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. The assessment will be provided to the NRC.	Closed. Same as Commitment No. 12-11657-7 mentioned earlier in the table under NOC-AE-13002958, dated February 21, 2013 (ADAMS Accession No. ML13092A257).
		12-11657-8	STPNOC will provide an implementation schedule of the time needed to implement the results of the communications assessment.	Closed. Same as Commitment No. 12-11657-8 mentioned earlier in the table under NOC-AE-13002958, dated February 21, 2013 (ADAMS Accession No. ML13092A257).
		12-11657-9	STPNOC will perform an initial staffing assessment using NEI 12-01 and material from NEI 10-05 (Phase 1 Assessment). STPNOC will provide the NRC with the results of the Phase 1 assessment and an implementation schedule of the time needed to implement any changes.	Closed. The results of the Phase 1 assessment were provided to the NRC staff by letter dated April 25, 2013 (ADAMS Accession No. ML13123A028).
		12-11657-10	STPNOC will perform a second staffing assessment as requested by the 50.54(f) letter using NEI 12-01 and provide the results of the assessment to the NRC (Phase 2 Assessment). STPNOC will provide the NRC with the results of the Phase 2 assessment and an implementation schedule of the time needed to implement any changes.	Open. The commitment completion date is scheduled for 4 months prior to the beginning of 2RE17. Due to the delayed outage, the commitment due date was extended to December 4, 2014, by letter dated April 25, 2014 (ADAMS Accession No. ML13123A028).
		12-11657-11	STPNOC will identify changes associated with the Phase 1 staffing assessment that have been made or will be made to our emergency plan regarding the on-shift or augmented staffing changes including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.) and provide this to the NRC.	Closed. Letter dated April 25, 2013 (ADAMS Accession No. ML13123A028), contained changes associated with STPNOC's Phase 1 Staffing Assessment Report.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		12-11657-12	STPNOC will identify changes associated with the Phase 2 staffing assessment that have been made or will be made to our emergency plan regarding the on-shift or augmented staffing changes including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.) and provide this to the NRC.	Open. Same as Commitment No. 12-11657-10.
NOC-AE-12002859, dated June 4, 2012 (ADAMS Accession No. ML12163A331)	90-Day Response to RAI Regarding Recommendation 9.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident	12-11657-14	Emergency Response Organization (ERO) members will be advised of the expectation to automatically respond to a designated staging area when made aware of a large scale external event (e.g. by direct observation, media reports, word-of-mouth, etc.).	Closed. Emergency Response Communication, OPGP05-ZV-0014, Revision 10 was issued to ERO members to satisfy the requirements of this commitment.
		12-11657-15	Procedures will be revised to include the expectation that ERO members automatically respond to a designated staging area when made aware of a large scale external event (e.g. by direct observation, media reports, word-of-mouth, etc.).	Closed. Emergency Response Organization Procedure OPGP05-ZV-003, Revision 13, Section 6.0, was revised to incorporate the commitment. However, the procedure was not marked to identify it as a regulatory commitment as required by procedure OPGP05-ZN-0002. Also, review of the latest procedure (Revision 16) indicated that reference to the source of commitment (Reference 6.11) in paragraph 6.1 was deleted by a later revision. CR 14-14177 was generated on August 19, 2014, to correct the error.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
NOC-AE-12002810, dated March 12, 2012 (ADAMS Accession No. ML12079A035)	1RE16 Inspection Summary Report for Steam Generator Tubing, Response to Request to RAI	12-4395-8	A review of the eddy current database confirmed that only five potential loose part signals remain in the database and the results of visual inspection are as listed in Table 5. The additional signal listed on accompanying tables was erroneously included and is a previous revision to the list which reflects a signal of interest dispositioned from the database prior to final closeout. The STP report will be revised to correct this error.	Closed. Letter dated January 29, 2013 (ADAMS Accession No. ML13042A149), was issued to fix the error.
NOC-AE-12002882, dated July 9, 2012 (ADAMS Accession No. ML12200A030)	STP 120-Day Response to NRC RAI Regarding the Seismic Aspects of Recommendation 2.3 of the NTTF Review of Insights from the Fukushima Dai-ichi Accident	12-12304-9	STPNOC confirms that it will use the seismic walkdown guidance (EPRI 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic") as endorsed by the NRC to conduct the walkdowns and develop the needed information at South Texas Project Units 1 and 2.	Closed. Due to inaccessible items in the seismic walkdown, CR 12-12304-9 was completed on November 21, 2012 and CR 12-12304-10 was created in letter dated November 27, 2013 (ADAMS Accession No. ML13003A275), to address items inaccessible during October 2012 walkdowns.
NOC-AE-14003143, dated June 9, 2014 (ADAMS Accession No. ML14184B363)	Supplement to License Amendment Request Proposed Revision to Technical Specification 3.3.1, Functional Unit 20, "Reactor Trip Breakers"	CR 11-2937-4	Procedures will be revised or created to ensure activities that degrade the availability of reactor coolant system pressure relief, auxiliary feedwater flow, ATWS Mitigating System Actuation Circuitry (AMSAC), and turbine trip will not be scheduled when a reactor trip breaker is out-of-service.	Open. The LAR dated June 9, 2014 (ADAMS Accession No. ML14184B363), is still under NRC staff review and approval.
		CR 11-2937-5	Procedures will be revised or created to ensure activities that could degrade other components of the reactor protection system including master relays, slave relays, and analog channels will not be scheduled concurrently with a logic cabinet out of service.	Open. The LAR dated June 9, 2014 (ADAMS Accession No. ML14184B363), is still under NRC staff review and approval.

Summary of Audit of Regulatory Commitments and Results of Audit Performed on August 18-19, 2014
STP Nuclear Operating Company
South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Licensee Letter No.	Subject	Commitment No.	Description of Commitment	Implementation Status
		CR 11-2937-6	Procedures will be revised or created to ensure activities on electrical systems (e.g. AC [alternating current] and DC [direct current] power) that support the functionality of the following systems or components will not be scheduled when a reactor trip breaker is unavailable: <ul style="list-style-type: none"> • Reactor coolant pressure relief, • Auxiliary feedwater, • AMSAC, • Turbine trip protective circuitry, and • Reactor protection system including master relays, slave relays, and analog channels. 	Open. The LAR dated June 9, 2014 (ADAMS Accession No. ML14184B363), is still under NRC staff review and approval.

D. Koehl

- 2 -

If you have any questions, please contact me at 301-415-3016 or via e-mail at Balwant.Singal@nrc.gov.

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. 50-498 and 50-499

Enclosure:
Audit Report

cc w/encl: Distribution via Listserv

DISTRIBUTION:

PUBLIC
LPL4-1 Reading
RidsAcrcsAcnw_MailCTR Resource
RidsNrrDorlLpl4-1 Resource
RidsNrrPMSouthTexas Resource
RidsNrrLAJBurkhardt Resource
RidsRgn4MailCenter Resource
TOrf, NRR/DORL
NO'Keefe, RIV/DRP/RPB-B
ASanchez, SRI

ADAMS Accession No.: ML14262A349

OFFICE	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL4-1/PM	NRR/DORL/LPL 4-1/LA	NRR/DORL/LPL4-1/BC(A)	NRR/DORL/LPL 4-1/PM
NAME	MWatford	BSingal	JBurkhardt	EOesterle	BSingal
DATE	09/25/14	09/25/14	9/25/14	10/03/14	10/09/14

OFFICIAL RECORD COPY