



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

February 12, 2015

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-3093

SUBJECT WATERFORD STEAM ELECTRIC STATION, UNIT 3 - AUDIT OF THE
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NO MF4430)

Dear Sir or Madam:

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. The previous audit of Entergy Operations, Inc.'s (the licensee's) commitment management program for Waterford Steam Electric Station, Unit 3 (WF3), was documented in an NRC letter dated August 29, 2011.

An onsite audit of the commitment management program for WF3 was performed on August 13-14, 2014. The NRC staff concludes, based on the audit, that (1) the licensee has implemented NRC commitments on a timely basis, and (2) the licensee has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

If you have any questions, please contact me at (301) 415-3229 or by e-mail at Michael.Orenak@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Orenak". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

Michael D. Orenak, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

Enclosure:
Audit Report

cc w/encl: Distribution via Listserv



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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

ENTERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

DOCKET NO. 50-382

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 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 Entergy Operations, Inc.'s (Entergy's, the licensee's) commitment management program for Waterford Steam Electric Station, Unit 3 (WF3) was performed at the plant site during August 13-14, 2014. The audit reviewed commitments made from June 30, 2011, to June 30, 2014. The previous audit of the licensee's regulatory commitment management program for WF3 was documented in an NRC letter dated August 29, 2011 (ADAMS Accession No. ML11580073).

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.).

Enclosure

2.0 AUDIT PROCEDURE AND RESULTS

The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed, (2) verification of the licensee's program for managing changes to NRC commitments, and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

2.1 Verification of Licensee's Implementation of NRC Regulatory 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 during the last 3 years 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

Table 1 (provided as Attachment 1 of this report), "Verification of the Licensee's Implementation of NRC Commitments," provides the specific details and results of the audit for verification of the licensee's implementation of regulatory commitments. The NRC staff sampled nine open, nine

closed, and four "passive" commitments (descriptions provided in Section 2.2.1). The review of the audit sample information yielded two minor deficiencies. One sample did not contain the appropriate closeout documentation, but was correctly completed. Another sample had an incorrect source document date. All of the sample regulatory commitments were correctly added into WF3's tracking database (LRS). All regulatory commitments were completed within their due dates (whether they were active, passive, or closed). The licensee tracked, completed, and closed the sample regulatory commitments successfully.

2.2 Verification of the Licensee's Program for Managing Changes to NRC Commitments

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 WF3 is contained in the licensee's procedure EN-LI-110, Revision 6, "Commitment Management Program." The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC.

2.2.1 Audit Results

2.2.1.1 Procedure EN-LI-110

The NRC staff reviewed the licensee's Procedure EN-LI-110, Revision 6, against NEI 99-04. Sections 1.0 and 2.0 of Procedure EN-LI-110 reference NEI 99-04 as a basis for this procedure.

The NRC staff found that the process described in Procedure EN-LI-110 generally follows the guidance of NEI 99-04 and provides detailed instructions for: (1) making and identifying regulatory commitments; (2) tracking regulatory commitments; (3) annotating implementing documents to provide traceability of regulatory commitments; (4) changing regulatory commitments; and (5) periodic reporting of commitment changes.

The licensee's Procedure EN-LI-110, Section 3.0 [10] uses an unusual categorization for the types of open regulatory commitments. Other reactor licensees use open and continuing compliance as categories for their open regulatory commitments. Procedure EN-LI-110 uses active and passive for regulatory commitment categories.

- Active means that an action needs to be directly performed. This is used for both open and continuing compliance regulatory commitments.
- Passive means that the action is completed through some other means (procedure, administrative controls, etc.), but the action might still need to be continually performed. Many of these regulatory commitments could be considered closed or continuing compliance by other licensees, but LRS continues to track them as regulatory commitments.

Despite the unusual categorization, the licensee correctly implemented the procedure's categorical definitions, unlike other recently audited Entergy sites using Procedure EN-LI-110.

The NRC staff concludes that the procedure used by the licensee to manage regulatory commitments provides the necessary attributes for an effective regulatory commitment management program in accordance with NEI 99-04.

2.2.1.2 Comments on Procedure EN-LI-110

Procedure EN-LI-110 demonstrated that it provides the necessary attributes for an effective regulatory commitment management program in accordance with NEI 99-04. However, the audit uncovered room for improvement in the following areas:

- The licensee's Procedure EN-LI-110 does not contain a process or procedure to obtain and process regulatory commitments made by Entergy Corporate or other industry partners, such as NEI. The licensee's stated, not written, procedure for these types of regulatory commitments was to receive the regulatory commitment (through any channel) and determine if it will accept the regulatory commitment. The licensee stated that no outside entity, including Entergy Corporate, can make a regulatory commitment for WF3.
- For an active continual compliance regulatory commitment, no proceduralized step(s) exists in Procedure EN-LI-110 for the completion documentation and reset of due dates in LRS. From the audit sample, the licensee correctly performed this step in each case by putting notes in the status section of the commitment's LRS record; however, a procedure step would be useful.
- Multiple regulatory commitments can be derived from a single source document. The LRS records that shared a single source document did not distinguish the commitment number in the source document. For enhanced traceability, each LRS entry could incorporate the commitment number from the source document.
- The licensee's Procedure EN-LI-110, Section 5.12, states that the licensee should perform a self-assessment of the regulatory commitment management program prior to the NRC audit. The NRC staff provided a list of commitments for the audit 2 weeks prior to arrival at WF3; however, no self-assessment was performed. The licensee did perform a self-assessment in 2013. Within the first hour of the onsite audit, the licensee staff acknowledged that the procedure requests a self-assessment be performed, but one was not completed. Other recently audited Entergy sites did not know that a pre-audit self-assessment should have been completed.

2.2.1.3 LRS

The licensee uses a tracking database named LRS that is common between Entergy sites. LRS is used not only for regulatory commitments, but for other non-regulatory commitment items, such as the items listed in Section 2.1.1 of this report. Because of this co-mingling, the ability to distinguish regulatory commitments from the rest of the database proved to be difficult and time consuming. To find regulatory commitments, the licensee performed a search of LRS with select keywords, then opens up the originating document to look specifically for regulatory commitments. No method was available to directly identify all regulatory commitments with one

action. The licensee stated that it recognized this challenge and is currently in the process of updating the LRS database to allow for improved searches and regulatory commitment identification.

2.2.1.4 Review of Commitment Changes

On April 30, 2012 (ADAMS Accession No. ML121220247), and April 29, 2014 (ADAMS Accession No. ML14129A350), the licensee submitted reports on the regulatory commitment changes per Procedure EN-LI-110 and NEI 99-04. Table 2, "Verification of the Licensee's Program for Managing NRC Commitment Changes" (provided as Attachment 2 of this report), verifies the licensee's program for managing commitment changes, as assessed from three samples. The NRC staff review of these samples found that all listed commitment changes within the audit date range were appropriate and performed per the guidance documents and procedures.

2.3 Verification That All Regulatory Commitments Were Correctly Applied

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).

2.3.1 Audit Scope

As discussed in LIC-105, the scope of this portion of the audit includes reviewing each of the commitments selected to sample the licensee's management of commitments (samples in Tables 1 and 2 examine the licensee's management of commitments) to determine if any had been misapplied. In addition, the NRC staff is directed to identify all license amendments, relief requests and exemptions that have been issued for a facility in the previous 3 years. Table 3, "Review of Issued License Amendments, Relief Requests and Exemptions" (provided as Attachment 3 of this report), lists each of these licensing actions for WF3.

2.3.2 Audit Results

2.3.3 Review of NRC License Amendments, Relief Requests, and Exemptions

Table 3 reviews issued license amendments, relief requests, and exemptions. Thirteen samples in the interval from June 30, 2011, to June 30, 2014, were reviewed. Eight of those samples contained a total of 13 commitments. In all eight cases, the commitments were used properly by NRC staff.

As shown in Table 3, Items 1, 4, 5, 6, 8, 9, 13, and 14 contain a total of 13 commitments. The NRC staff did not use any of the commitments as the basis for its safety evaluations. However, many of the licensee's regulatory commitments were covered within the regulatory process of

the submittal and did not need to be regulatory commitments (see Section 2.1.1 above). For the amendments regarding Cyber Security, the four commitments are the same as the amendment's proposed license conditions, making the proposed regulatory commitment redundant. For each of the seven regulatory commitments contained within the request(s) for alternative(s), the submittals were also paralleled by the proposed commitments. In any request(s) for alternative(s), the proposed alternative becomes a part of the licensee's inservice inspection or inservice testing programs and are therefore obligations (i.e., changing from one alternative to another alternative would require NRC approval), resulting in the proposed regulatory commitments being redundant.

3.0 OBSERVATIONS RELEVANT TO FUTURE AUDITS

- The licensee stated that it is in the process of reorganizing and updating LRS to allow for easier identification and tracking of regulatory commitments. Future audits should check the progress of this update process.
- The licensee stated that the southern Entergy sites (WF3, Grand Gulf Nuclear Station, and River Bend Station) would be coordinating a revision to Procedure EN-LI-110 to separate regulatory commitments from other items in LRS. Future audits should examine this updated section.
- The licensee quickly acknowledged that a pre-audit self-assessment/inspection was not performed, but is a part of NEI 99-04. The licensee could be reminded of this pre-audit inspection, so there is sufficient time to perform it before NRC staff arrival.
- The process to incorporate Corporate/NEI/Pressurized Water Reactors Owners Group/etc., commitments could be proceduralized further, possibly into Procedure EN-LI-110. Currently, there is no procedure or method to discover external commitments and one could not be communicated and forgotten. Future audits should check for the existence of a process for obtaining external commitments.
- The licensee's Procedure EN-LI-110 does not have a procedure step to update and document in LRS each successive completion of a continuing compliance commitment. Future audits should check the procedure for an added step to ensure this action occurs.
- Because multiple regulatory commitments can be derived from a single source document, LRS regulatory commitment records that share a single source document could incorporate the commitment number from the source document. Future audits should check on future LRS regulatory commitment records to see if they incorporate a source document commitment number.
- Many of the recent commitments were redundant with the submittal from which they came. Future audits should check the submittals and associated commitments for redundancy.

4.0 CONCLUSION

The NRC staff concludes, based on the above audit, that (1) the licensee has implemented NRC commitments on a timely basis; and (2) the licensee has implemented an effective program for managing NRC commitment changes. The licensee's procedure used to manage commitments provides the necessary attributes for an effective commitment management program. The combination of the procedure, software platform, and support staff appear to be effective in their management of regulatory commitments. The licensee's staff appears to properly apply commitments in its regulatory decision making.

5.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Lilian Brown
Joe Williams

Principal Contributors: M. Orenak
A. Wang

Date: February 12, 2015

Attachments:

1. Table 1 – Verification of the Licensee's Implementation of NRC Commitments
2. Table 2 – Verification of the Licensee's Program for Managing NRC Commitment Changes
3. Table 3 – Review of NRC License Amendments, Relief Requests, and Exemptions

TABLE 1
Verification of the Licensee's Implementation of NRC Commitments
(See Note 1)

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
1	A-27530 Open	Letter dated 6/7/2012 Agencywide Documents Access and Management System (ADAMS) Accession No. ML12164A676	Response to NRC's Request for Information Regarding the Flooding Aspects of Recommendations 2.1 and 2.3 of the Near-Term Task Force (NTTF) Review of Insights from the Fukushima Daiichi Accident.	Submit Flood Hazard Evaluation to the NRC.	Item tracked properly. Commitment completion scheduled. Yes
2	A-27531 Open	Letter dated 6/7/2012 ADAMS Accession No. ML12164A676	Response to NRC's Request for Information Regarding the Flooding Aspects of Recommendations 2.1 and 2.3 of the (NTTF) Review of Insights from the Fukushima Daiichi Accident.	An approach for developing an Integrated Assessment for Waterford Steam Electric, Unit 3 (WF3) will be submitted 60 days after NRC endorsement of the integrated assessment guidance.	Item tracked properly. Yes
3	A-27588 Open	Letter dated 9/26/2013 ADAMS Accession No. ML13270A041	Request for Alternative W3-ISI-023, American Society of Mechanical Engineers (ASME) Code Case N-770-1 Successive Examinations.	Perform N-770-1 Examination of the 30" and 12" reactor coolant system (RCS) nozzles within 54 months of the Spring 2014 outage [letter stated fall 2018 outage].	Item tracked properly. Commitment completion scheduled. Yes
4	A-27554 Open	Letter dated 5/16/2013 ADAMS Accession No. ML13137A133	Closure Option for Generic Safety Issue – 191.	If Waterford 3 removes or modifies insulation debris sources in containment, then Waterford 3 will revise its' current license bases within six months after any refueling outage where insulation change occurs.	Item tracked properly. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
5	A-27487 Open	Letter dated 5/10/2012 ADAMS Accession No. ML12135A087	Entergy's 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Conduct the onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2.	Item tracked properly. Commitment completion scheduled. Source document date in LRS (WF3 tracking database) is incorrect. Yes
6	A-27488 Open	Letter dated 5/10/2012 ADAMS Accession No. ML12135A087	Entergy's 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2.	Item tracked properly. Commitment completion scheduled. Source document date in LRS is incorrect. Yes
7	A-27489 Open	Letter dated 5/10/2012 ADAMS Accession No. ML12135A087	Entergy's 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Provide a schedule of the time needed to implement changes associated with the Phase 2 staffing assessment.	Item tracked properly. Commitment completion scheduled. Source document date in LRS is incorrect. Yes
8	A-27490 Open	Letter dated 5/10/2012 ADAMS Accession No. ML12135A087	Entergy's 60-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Identify changes that have been made or will be made to the emergency plan regarding the on-shift or augmented staffing changes associated with the Phase 2 staffing assessment.	Item tracked properly. Commitment completion scheduled. Source document date in LRS is incorrect. Yes
9	A-27576 Open	Letter dated 6/27/2013 ADAMS Accession No. ML13179A038	Implementation of Multi-source Dose Assessment Capability.	Waterford 3 plans to transition to software such as Unified Rascal Interface (URI), Version 2, which provides for an improved capability for multi-source dose consequence analysis.	Item tracked properly. Commitment completion scheduled. Source document date in LRS is missing. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
10	A-27587 Closed	Letter dated 9/26/13 ADAMS Accession No. ML13270A041	Request for Alternative W3-ISI-023, ASME Code Case N-770-1 Successive Examinations.	The actual examination summary and coverage results will be provided to the NRC only if the actual examination coverage is less than the weld with the bounding examination coverage provided in Table 1.	Item closed properly with adequate documentation. Yes
11	A-27485 Closed	Letter dated 10/31/12 ADAMS Accession No. ML12306A194	Response to the March 12, 2012, Information Request Pursuant To 10 CFR 50.54(f) Regarding Recommendation 9.3 For Completing Emergency Communication Assessments.	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.	Item closed properly with adequate documentation. Yes
12	A-27483 Closed	Letter dated 6/7/2012 ADAMS Accession No. ML12164A683	Entergy's 90-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.	Item closed properly with adequate documentation. Yes
13	A-27478 Closed	Letter dated 6/7/2012 ADAMS Accession No. ML12164A683	Entergy's 90-Day Response to the March 12, 2012, Information Request, Action Plan for Completing Emergency Communication and Staffing Assessments.	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete. Submit to NRC.	Item closed properly with adequate documentation. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
14	A-27565 Closed	Letter dated 4/29/2013 ADAMS Accession No. ML13119A461	Entergy's Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.1 of Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident.	Entergy Operations Inc. (Entergy), intends to respond to Enclosure 1 of NRC letter to Entergy, Request for Information Pursuant to Title 10 of the <i>Code of Federal Regulations</i> [10 CFR] 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Daiichi Accident, dated March 12, 2012, by following the approach described in Nuclear Energy Institute (NEI) letter to NRC, Proposed Path Forward for NTTF Recommendation 2.1: Seismic Reevaluations, dated April 9, 2013.	Item closed properly with adequate documentation. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
15	A-27511 Closed	Letter dated 11/30/2012 ADAMS Accession No. ML12339A070	Request for Alternative W3-1SI-021, ASME Code Case N-770-1 Baseline Examination Request for Alternative.	Waterford 3 will perform appropriate actions to comply with ASME Section XI Code Case N-770-1 baseline examinations for dissimilar metal weld 08-007 prior to startup from the planned Spring 2014 refueling outage. Actions to accomplish compliance with ASME Section XI Code Case N-770-1 consist of the following: 1. Entergy will work with EPRI [Electric Power Research Institute] to design a mock up that incorporates the - configuration of the Waterford 3 08-007 DM [dissimilar metal] weld. 2. This mock-up will be used to demonstrate/qualify the UT [Ultrasonic Examination] technique utilized during the Fall refueling outage (RF18). This UT technique will be performed in accordance with the PDI [Performance Demonstrative Initiative] Site Specific Configuration Mockup Requirements for DM Welds or through procedure expansion in accordance with the PDI Program. If the demonstration should determine that additional scanning is required, Entergy will reexamine weld 08-007 during the scheduled Spring 2014 refueling outage using the newly qualified.	Item closed properly with adequate documentation. Yes
16	A-27510 Closed	Letter dated 12/3/2012 ADAMS Accession No. ML12340A011	Reply to a Notice of Violation: EA-12-198.	Waterford 3 will establish a design basis for the Mississippi River level at which flood control measures are to be initiated for closing the water tight doors and Procedure OP-901-521, "Severe Weather and Flooding" will be updated as necessary.	Item closed properly. Adequate documentation was not provided for the update of procedure OP-901-521. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
17	A-27464 Closed	Letter dated 11/21/2011 ADAMS Accession No. ML11326A283	License Amendment Request to Relocate Technical Specifications to the Technical Requirements Manual.	The proposed change will relocate the following Technical Specifications (TS) to the Waterford 3 Technical Requirements Manual: TS 3.4.6 (Chemistry) TS 3.7.5 (Flood Protection) TS 3.7.9 (Sealed Source Contamination) TS 3.9.5 (Communications).	Item closed properly with adequate documentation. Yes
18	A-27017 Closed	Letter dated 12/20/2006 ADAMS Accession No. ML063600109	Entergy Actions to Address RF14 Batwing Failures.	Waterford 3 will continue to perform augmented inspections of the secondary side of the steam generators in each subsequent refueling outage until the current steam generators are replaced. The augmented inspections will include the upper batwing to wrapper bar welds, inspection of the stay cavity region, and foreign object search and retrieval (FOSAR) of the secondary side.	Item closed properly with adequate documentation. Yes
19	P-27535 Passive	Letter dated 7/9/2012 ADAMS Accession No. ML12192A208	Entergy 120-Day Response to NRC Request for Information (RFI) Pursuant to 10 CFR 50.54(f) Regarding the Seismic Aspects of Recommendation 2.3 of the Near-Term Task Force Review of Insights from Fukushima Dai-ichi Accident Waterford Steam Electric Station, Unit 3.	Entergy confirms that it will use the seismic walkdown procedure (EPRI Report 1025286, "Seismic Walkdown Guidance: For Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic") as endorsed by Reference 2 as the basis to conduct the walkdowns and develop the needed information at Waterford 3.	Item adequately documented. Yes

Item No.	Commitment Tracking Number and Open/Closed/Passive	Licensee Submittal (ADAMS Accession No.)	Subject	Commitment as stated in Licensee Submittal	Commitment Status and Audit Sample Item Disposition Results in accordance with NEI 99-04 and Licensee's Procedures? (Yes/No) in boldface
20	P-27496 Passive	Letter dated 1/11/2007 Nonpublic-Security-Related Information	Response Providing Information Regarding Implementation Details for the Phase 2 and Phase 3 Mitigation Strategies.	Entergy will conduct training on the mitigation strategy procedures or guidelines.	Item adequately documented. Yes
21	P-27019 Passive	Letter dated 12/20/2006 ADAMS Accession No. ML063600109	Entergy Actions to Address RF14 Batwing Failures	Steam generator leakage transient simulator scenarios will be used in the operating training in alternating cycles.	Item adequately documented. Yes
22	P-27472 Passive	Letter dated 2/22/2010 ADAMS Accession No. ML100550606	License Amendment Request for Approval of Leak-Before-Break of the Pressurizer Surge Line.	Entergy will modify the Waterford 3 Final Safety Analysis Report to include additional details on RCS Leakage Detection System capability.	Item adequately documented. Yes

Note 1: The scope of this portion of the audit includes verification of the licensee's implementation of commitments associated with NRC licensing actions (e.g., amendments, relief requests, exemptions, orders) or licensing activities (e.g., bulletins, generic letters) during the previous 3 years. For purposes of this audit, the scope included samples based on review of licensee submittals dated June 30, 2011, through June 30, 2014. See Audit Report Section 2.1 for further details.

TABLE 2
Verification of the Licensee's Program for Managing NRC Commitment Changes
(See Note 1)

Item No.	Licensee Tracking No.	Description of Commitment Change	Audit Results - Verification of Licensee's Program for Managing Commitment Changes
9	A-27589 Letter dated 10/31/2013 ADAMS Accession No. ML13305A127	Inservice inspection of the Dissimilar Metal Weld (DMW) weld overlays with cast stainless steel safe ends for Pressurizer Safety/Relief Valves' weld overlays will be performed at a higher frequency, every 9 years instead of 10 years, than other DMW weld overlays.	Commitment was made more conservative and a revised commitment was appropriate.
2	A-27017 Letter dated 4/29/2014 ADAMS Accession No. ML14129A350	Augmented inspections are to be performed of the secondary side of the steam generators in each subsequent refueling outage until the current steam generators are replaced.	The steam generators were replaced, so the commitment was properly deleted.
3	A-27466 Letter dated 12/19/11 ADAMS Accession No. ML11356A083	The licensee changed the date as to when their aging management program in accordance with Materials Reliability Program (MRP)-227 would be submitted to the NRC. At the time of the letter, the approved version of the topical report had yet to be published.	The licensee appropriately changed the committed date as to when the aging management program would be submitted.

Note 1: The scope of this portion of the audit includes verifying that the licensee has established appropriate administrative controls for modifying or deleting regulatory commitments made to the NRC. The scope includes commitment changes reported to the NRC and commitment changes not reported to the NRC for the previous 3 years. See Audit Report Section 2.2.2.4 for further details.

TABLE 3
Review of Issued License Amendments, Relief Requests, and Exemptions
(See Note 1)

Item No.	NRC letter date (Accession No.)	Description	Safety Evaluation Discusses Commitments? (Yes/No)	Audit Results
1	7/20/11 ADAMS Accession No. ML111800021	Amendment No. 234, Revise License Condition and Approval of Cyber Security Plan and Associated Implementation Schedule	Yes	The licensee provided two commitments. The safety evaluation stated the licensee committed to dates related to the Cyber Security Plan, but these dates can't be unilaterally changed per 10 CFR 73.54, "Protection of digital computer and communication systems and networks." The staff dispositioned the commitments properly.
2	4/25/12 ADAMS Accession No. ML120940171	Amendment No. 235, Revise Technical Specification Applicability and Action Language for Revised Fuel Handling Accident Analysis	No	No use of commitments
3	7/31/12 ADAMS Accession No. ML12152A341	Amendment No. 236, Revise Technical Specifications Related to Steam Generator Tube Integrity to Support Replacement of Steam Generators	No	No use of commitments
4	10/31/12 ADAMS Accession No. ML12250A435	Amendment No. 237, Revise Technical Specification 3/4.7.4 Table 3.7-3, "Ultimate Heat Sink Minimum Fan Requirements Per Train"	No	The licensee provided two commitments. One provided an implementation date and the other was to provide a docked supplement, both of which were used properly. The staff did not discuss or use the commitments.
5	12/20/12 ADAMS Accession No. ML12278A331	Amendment No. 238, Relocate Technical Specification (TS) 3.4.6, TS 3.7.5, TS 3.7.9, and TS 3.9.5 to the Technical Requirements Manual	No	The licensee provided one commitment, which was basically to perform the action they requested in the amendment request. The staff did not use or discuss the commitment.
6	12/20/12 ADAMS Accession No. ML12244A059	Amendment No. 239, Revise Physical Protection License Condition Related to Milestone 6 of the Cyber Security Plan Implementation Schedule	Yes	The licensee provided one commitment. The safety evaluation stated the licensee committed to dates related to the Cyber Security Plan, but these dates can't be unilaterally changed per 10 CFR 73.54. The staff dispositioned the commitment properly.

Item No.	NRC letter date (Accession No.)	Description	Safety Evaluation Discusses Commitments? (Yes/No)	Audit Results
7	12/28/12 ADAMS Accession No. ML12347A140	Amendment No. 240, Revise QA Program Manual and Staff Qualification Technical Specifications	No	No use of commitments
8	10/14/11 ADAMS Accession No. ML112570168	Request for Alternative W3-ISI-019 from Inservice Inspection Requirements of Reactor Vessel Head In-Core Instrument Nozzles, Third 10-Year Inservice Inspection Interval	Yes	The two commitments constitute the proposed alternative, which results in them becoming a part of the ISI program and elevating them to the obligation status. The staff acknowledged the commitments, but did not highlight this fact in the SE. The staff addressed the commitments properly. The staff addressed the commitments in the proper manner.
9	10/14/11 ADAMS Accession No. ML112570273	Request for Alternative W3-ISI-018 from Inservice Inspection Requirements of Reactor Pressure Vessel Head Control Element Drive Mechanism Nozzles, Third 10-Year Inservice Inspection Interval	Yes	The one commitment constitutes the proposed alternative, which results in it becoming a part of the ISI program and elevating it to the obligation status. The staff acknowledged the commitment, but did not highlight this fact in the SE. The staff addressed the commitment properly. The staff addressed the commitment in the proper manner.
10	1/4/12 ADAMS Accession No. ML113330137	Request for Alternative W3-CISI-002 to ASME Code, Section XI, IWE-5221 for Post-repair Testing of Steel Containment Vessel Opening, Third 10-Year Inservice Inspection Interval	No	No use of commitments
11	11/8/12 ADAMS Accession No. ML12293A362	Relief Request VRR-WF3-2012-1 Associated with Category A Leak Test of Component Cooling Water Check Valve ACC-108B for the Third 10-Year Inservice Inspection Interval	No	No use of commitments
12	5/31/13 ADAMS Accession No. ML13128A129	Request for Alternative W3-ISI-020, ASME Code Case N-770-1 Baseline Examination Request for the Third 10-Year Inservice Inspection Interval	No	No use of commitments

Item No.	NRC letter date (Accession No.)	Description	Safety Evaluation Discusses Commitments? (Yes/No)	Audit Results
13	8/2/13 ADAMS Accession No. ML13192A222	Request for Alternative W3-ISI-021, ASME Code Case N-770-1 Baseline Examination Request for the Third 10-Year Inservice Inspection Interval	Yes	<p>The two commitments constitute the proposed alternative, which results in them becoming a part of the ISI program and elevating them to the obligation status. The staff acknowledged the commitments, but did not highlight this fact in the SE. The staff addressed the commitments properly.</p> <p>The staff addressed the commitments in the proper manner.</p>
14	3/26/14 ADAMS Accession No. ML14070A008	Request for Alternative W3-ISI-023, ASME Code Case N-770-1 Successive Examinations, Third 10-Year Inservice Inspection Interval	No	<p>The two commitments constitute the proposed alternative, which results in them becoming a part of the ISI program and elevating them to the obligation status. The staff did not acknowledge the commitments in the SE.</p> <p>The staff did not utilize the licensee's commitment in the evaluation.</p>

Note 1: The scope of this portion of the audit includes a review of all license amendments and relief requests issued during the previous 3 years for WF3. There were no exemptions issued for WF3 in the past 3 years. The intent of the review is to determine the extent to which commitments have been misapplied (e.g., commitment relied on by NRC staff rather than making the commitment an obligation or incorporating the commitment into a mandated licensing basis document). See Audit Report Section 2.3 for further details.

If you have any questions, please contact me at (301) 415-3229 or by e-mail at Michael.Orenak@nrc.gov.

Sincerely,

/RA/

Michael D. Orenak, Project Manager
Plant Licensing IV-2 and Decommissioning
Transition Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-382

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