



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

December 31, 2014

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 - AUDIT OF
EXELON GENERATION COMPANY, LLC'S, MANAGEMENT OF
REGULATORY COMMITMENTS (TAC NOS. MF3272 AND MF3273)**

Dear Mr. Pacilio:

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, 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 three 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.

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An audit of the Quad Cities Nuclear Power Station, Units 1 and 2, commitment management program was performed at NRC Headquarters in Rockville, MD during the period of December 12, 2013 – January 5, 2014. The NRC staff concludes, based on the audit, Exelon Generation Company had implemented NRC commitments on a timely basis.

Sincerely,

A handwritten signature in black ink that reads "Brenda Mozafari". The signature is written in a cursive style with a small star-like mark at the end of the last name.

Brenda Mozafari, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-254 and 50-265

Enclosure:
Audit Report

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2

DOCKET NOS. 50-254 AND 50-265

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, 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, that changes to the regulatory commitments are evaluated, and when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every three 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.

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, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every three years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Quad Cities Nuclear Power Station, Units 1 and 2 (QCNPS), commitment management program was performed at the NRC Headquarters in Rockville, MD during the period of December 12, 2013 – January 5, 2014. The audit reviewed commitments made since the last audit conducted in August 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102700460). The audit consisted of two 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.

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.

Enclosure

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.). Before the audit, the NRC staff searched the ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification. The staff also coordinated with the licensee representative to get a listing of regulatory commitments.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, technical specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The attached Audit Summary provides details of the audit and its results.

The NRC staff reviewed documents generated by the licensee supporting the maintenance of commitments generated during license renewal and listed in the attached Audit Summary. After identification, commitments were managed within the electronic database "Passport," an element of the corrective action process. The NRC staff found that Exelon Generation Company, LLC (EGC), was able to identify the regulatory commitments and provide documentation of the status of the commitment implementation.

The NRC staff also sampled documents generated between 2010 and 2014 to determine whether regulatory commitments generated in those documents were included in the regulatory commitment management process. The staff focused on those commitments generated during license renewal.

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 staff focused on changes to the program that became effective after the last commitment management audit in 2010.

2.2.1 Audit Results

The attached Audit Summary also provides details of the audit results of the licensee's program for managing NRC commitment changes. The NRC staff found that Procedure LS-AA-110, Revision 8, was consistent with the guidance found acceptable in NEI 99-04. The staff found that the licensee followed the process in their procedure.

3.0 CONCLUSION

The NRC staff concludes that, based on the findings of the Audit, (1) EGC identified the regulatory commitments contained within the licensing actions selected for this audit and was able to document the status of the commitment implementation; (2) EGC's commitment management program is adequate at identifying and maintaining regulatory commitments; and (3) the NRC staff could confirm that EGC has established a well-defined process for managing commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

K. Nicely

Principal Contributors: Anthony Minarik
Brenda Mozafari

Attachment: Summary of Audit Results

AUDIT SUMMARY

The process used at Quad Cities Nuclear Power Station to manage commitments is contained in procedure LS-AA-110, Revision 9, "Commitment Management." The staff reviewed the licensee's procedure against the guidance contained in Nuclear Energy Institute (NEI) 99-04, "Guidance for Managing NRC Commitment Changes," focusing on changes to the program implemented after the U.S. Nuclear Regulatory (NRC) staff's 2010 program audit. In general, the staff found that LS-AA-110 follows closely with the guidance in NEI 99-04, and that the procedure is comprehensive and generally effective.

The NRC staff also reviewed actions the licensee took as a result of the 2010 commitment management audit to address observations from that audit in particular, during the review of LS-AA-110 in 2010, the NRC observed that the licensee did not provide a specific timeline or recommendation in terms of "timely notification" of the NRC when changing or deleting a commitment. The staff noted that in the very next Revision to LS-AA-110 after the completion of the 2010 audit, the licensee prescribed 30 days as the expected time by which the licensee should notify the NRC of any changes. Additionally, the NRC staff noticed that the licensee included explanatory Notes in its most recent revision (Revision 10) to LS-AA-110. These notes attempt to clarify the specific situations which regulatory commitments apply. The staff finds both of these particular changes to be marked improvements over the previous versions of LSA-AA-110. Other changes made were deemed appropriate and acceptable.

The NRC staff reviewed the following commitments and had no findings. The licensee properly characterized all of the commitments below:

OPEN COMMITMENTS:

The NRC staff reviewed a representative sample of the 20 open commitments submitted by the licensee. All of the commitments were properly identified and maintained according to the licensee's commitment management program. A selection of open commitments is given below to provide an overview of the topics reviewed by the staff:

<u>LICENSEE TRACKING NO.</u>	<u>COMMITMENT TITLE</u>
00101562-49-10	(B.1.1) Perform QC 2 Reactor Head Crack Inspection
01362747-54-00	Regulatory Commitment to Install Emergency Preparedness Communications Equipment
01548784-01-00	Update Quad Cities UFSAR with Rio-Tinto Alcan Composite Surveillance
01548784-03-00	Reflect k-infinity Limitations in UFSAR Section 9.1.2
01554929-10-00	Near Term Task Force Recommendation 2.1 Flooding commitment 3

CLOSED COMMITMENTS:

The NRC staff reviewed a representative sample of the 26 closed regulatory commitments submitted by the licensee. All of the commitments were properly closed according to the licensee's commitment management program. A selection of closed commitments is given below to provide an overview of the topics reviewed by the staff:

<u>LICENSEE TRACKING NO.</u>	<u>COMMITMENT TITLE</u>
00749581-49-09	Change ECCS procedures for venting practices per GL 08-01
01223694-71-00	Approved Cyber Security Plan – Commitment 7
01427154-54-00	NRC Request for Information 2.3 Seismic Walkdown Deferred inspection
01223694-87-00	Establish a monthly wireless rogue scanning surveillance
01554929-09-00	Near Term Task Force Recommendation 2.1 Flooding commitment 9

COMMITMENTS ASSOCIATED WITH LICENSE RENEWAL:

The staff reviewed a representative sample of the 51 commitments developed during license renewal submitted by the licensee. Of these commitments the staff reviewed the following two commitments related to Quad Cities:

COMMITMENT TITLE	DESCRIPTION	IMPLEMENTATION SCHED.
Water Chemistry Program	The Water Chemistry program will be enhanced to provide increased sampling to verify corrective actions are taken to address abnormal chemistry conditions.	Prior to the period of extended operation
BWR Feedwater Nozzle	The program will be enhanced to implement the recommendations of Revision 1, Version A of report GE-NE-523-A71-0594-A, Revision 1, which was approved by the NRC staff.	Prior to the period of extended operation

Based on the above, the NRC staff's review concluded that the licensee maintained records of commitments and documented commitment changes appropriately.

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Sincerely,

/RA/

Brenda Mozafari, Project Manager
Plant Licensing Branch III-2
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NRR-106

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