



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

April 20, 2015

Mr. Terry D. Hobbs
General Manager Decommissioning
Crystal River Nuclear Plant (NA2C)
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT – AUDIT OF THE
LICENSEE’S MANAGEMENT OF REGULATORY COMMITMENTS
(TAC NO. MF5333)

Dear Mr. Hobbs:

The U.S. Nuclear Regulatory Commission (NRC) informed the 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 the 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.

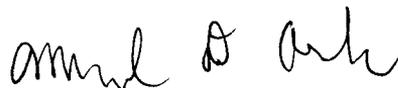
An audit of the Crystal River Unit 3 Nuclear Generating Plant (CR-3) commitment management program was performed at the plant site on December 17, 18, and 19, 2014. The NRC staff concludes, based on the information obtained in the audit, that (1) CR-3 has generally implemented NRC commitments on a timely basis, and (2) CR-3 has implemented an overall effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

T. Hobbs

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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 written in a cursive style with a large initial "M".

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. 50-302

Enclosure:
Audit Report

cc w/enclosure: Distribution via Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

DUKE ENERGY FLORIDA, INC.

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT

LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS

DOCKET NO. 50-302

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) informed the 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, Revision 0, "Guidelines for Managing NRC Commitment Changes" (ADAMS Accession No. ML003680088) 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 the licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04 and that the regulatory commitments are being effectively implemented. An audit of Duke Energy Florida, Inc. (the licensee), commitment management program for Crystal River Unit 3 Generating Plant (CR-3) was performed at the plant site on December 17-19, 2014. This was the third audit performed at the plant site for CR-3. The previous audit was conducted in June 2011 and recorded in the audit report dated January 31, 2012 (ADAMS Accession No. ML11242A151). The third audit reviewed commitments made since the second audit (i.e., from October 1, 2011, to October 1, 2014).

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 the 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 new commitments, (2) verification of the licensee's program for managing changes to NRC commitments, and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions and 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 (i.e., 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 or 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 or activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations and Technical Specifications. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The NRC staff reviewed the licensee's procedure for commitment management, REG-0110, "Regulatory Commitments," Revision 1, May 6, 2014 as the effective date. REG-0110,

Revision 1 is applicable to regulatory commitments made or modified after the effective date of this procedure.

The NRC staff reviewed REG-0110, Revision 1 and found that the guidance is consistent with the intent of NEI 99-04, and ensures that CR-3 is appropriately implementing regulatory commitments. However, the staff found one unusual provision within Section 9.1.2. That section suggests that a regulatory commitment includes a "sunset clause" to establish a period of time to evaluate the effectiveness of that commitment. After this evaluation period, if it is determined that the commitment actions are not effectively achieving the objective of the commitment, the regulatory commitment would no longer be a regulatory commitment. REG-0110, Revision 1 does not establish when or how this determination is made, nor does it specify the fate of a commitment which was determined to be ineffective (e.g., whether the ineffective commitment is actively closed by licensing staff, or whether it is simply ignored). Upon asking for clarification, the licensee responded that Section 9.1.2 of the procedure has rarely been invoked, if ever.

The licensee manages commitments made to the NRC in a database called "PassPort." The PassPort database handles the commitments that are opened or actively being executed. In addition to tracking all commitments, including commitments made to state and other agencies, PassPort also tracks other plant activities. For each regulatory commitment, a Nuclear Task Management action should be initiated by licensee staff, and the regulatory commitment should be captured in PassPort as an Action Request (AR). Appropriate actions to implement the regulatory commitment should be captured in a PassPort Action Tracking Assignment. Due dates and the names of individuals responsible for meeting the commitment are also entered.

A site-specific procedure, CP-252, "Commitment Management," Revision 8, is also being utilized at the CR-3 site. The procedure defines a process for identifying, managing, and changing ongoing regulatory commitments. An ongoing commitment is defined in this procedure as a commitment requiring ongoing and continuous implementation, whereas a one-time commitment is a commitment that is to be completed once by a specific date, event, or milestone, and has no future or ongoing action. CR-3 manages ongoing commitments in an older commitment system named Nuclear Operations Commitment System (NOCS). Procedure CP-252 defines the process for creating, maintaining, and changing NOCS database entries for the ongoing regulatory commitments. A computer report from the NOCS database cross-references commitments to CR-3 implementation.

Prior to the onsite audit, the NRC staff searched ADAMS for licensee documents submitted since the previous audit, which contained new regulatory commitments related to licensing actions. The NRC staff chose a sample of new commitments for audit and requested that the licensee provide the associated documentation from NOCS and PassPort, including the licensee's letter and date that contained the commitment text and summary sheets providing the regulatory commitment action request and assignment numbers.

The NRC staff reviewed commitment documentation for items identified as regulatory commitments by the licensee, including regulatory commitments that were made, closed, and ongoing since the last audit, to assess the implementation for each. A summary of the reviewed commitments is provided in Tables 1, 2, 3, and 4 in the attachment. For the commitments selected for the audit, the NRC staff found that the licensee had adequately captured all of the

new regulatory commitments in its PassPort system. For the ongoing commitments, the NRC staff verified that they had been correctly entered into the NOCS database or transferred from PassPort to NOCS and correctly referenced. For closed commitments, the NRC staff was informed by the licensee's staff to one commitment that was improperly closed. By letter dated October 8, 1995, the licensee committed to use optical disk for data management of quality assurance systems records as a response to Generic Letter 88-18, "Plant Record Storage on Optical Disks." The procedure, RDC-1, to store quality assurance records on optical disk was discontinued; however, instead of being properly inactivated under the commitment change protocol, the commitment was simply deleted from the NOCS system. The NRC staff did not find any other improperly closed commitments in their review.

During the audit, the NRC staff reviewed plant procedures that have been revised as a result of commitments made by the licensee to the NRC. The NRC staff noted that procedures that are affected by a regulatory commitment are identified in the PassPort database under the Action Request assigned for that commitment. The licensee's procedure owner is advised to refer to all the regulatory commitments associated with each procedure prior to making any changes to the procedure, proactively preventing a change that could modify a commitment.

Based on the review of the sample commitments in the PassPort database and the commitment procedures, the NRC staff found that CR-3 properly implements their commitment management program for new, ongoing, and closed commitments.

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 CR-3 is contained in Duke Energy's procedure, REG-0110, Revision 1. This procedure, in coordination with the CR-3 procedure CP-252, is being used at CR-3 for tracking changes to regulatory commitments made to the NRC. 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 need not be reported to the NRC. 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 licensee personnel are able to recognize that future proposed changes to the execution of the commitment will require evaluation in accordance with the commitment change control process.

2.2.1 Audit Results

The NRC staff reviewed the licensee's procedure, REG-0110, Revision 1 against NEI 99-04. REG-0110, Revision 1, provides guidance to the licensee consistent with the intent of NEI 99-04 and which ensures that CR-3 is appropriately implementing regulatory commitment changes, as well as tracking changes to the commitments. The following statements in REG-0110, Revision 1, provide guidance to the licensee for managing changes to commitments:

- When notified of the need to change a Regulatory Commitment, the Manager Regulatory Affairs, or designee, shall ensure an Assignment is initiated to the

individual group....

- The Manager Regulatory Affairs, or designee, shall review the Regulatory Commitment Change Evaluation, including any necessary supporting documents, and verify the action that needs to be taken based on the results.
- As appropriate, the Manager Regulatory Affairs, or designee, shall:
 1. Record the basis for authorizing or not authorizing the change...including a reference to the original AR, if different.
- The Manager Regulatory Affairs, or designee, shall ensure that any revised Regulatory Commitment, that satisfies the criteria in either Step 4.2 or Step 5.2 of the Regulatory Commitment Change Evaluation for Attachments 3 and 4, is included on a summary report of the Regulatory Commitment changes, which is submitted on a frequency consistent with 10 CFR [Title 10 of the *Code of Federal Regulations*] 50.71(e) FSAR [Final Safety Analysis Report] updates or biennially.

The NRC staff found that REG-0110, Revision 1 adequately conforms to the guidance and intent of NEI 99-04 for commitment tracking, the commitment change process, traceability of commitments, and reporting requirements. Regulatory Commitment changes are processed and tracked by the responsible licensing supervisor or designee. The NRC staff reviewed the Regulatory Commitment Change Evaluation forms in the procedure and found them consistent with the intent of the "Commitment Evaluation" form in NEI 99-04.

During the audit, the NRC staff reviewed the licensee's letter dated May 29, 2014, which includes a summary of the CR-3 regulatory commitment changes for the period from January 5, 2012, to January 5, 2014. This regulatory commitment change report indicated that of the 100 regulatory commitments that were modified or inactivated, 49 met the NEI 99-04 criteria for NRC notification. During the audit, the NRC staff reviewed the Regulatory Commitment Change Evaluation forms for those changes that were reported to the NRC, as well as for those that did not meet the NEI 99-04 criteria for reporting to the NRC.

During the audit, the NRC staff reviewed the inactivation of three regulatory commitments resulting from changes in the CFR that had escalated the commitments to obligations. The guidance in NEI 99-04 recognizes that at the time a new rule becomes effective, the same actions formerly carried out as commitments are now used to fulfill obligations and are, therefore, no longer considered commitments. The NRC staff noted that several of the commitments had remained open and tracked as commitments for years after the actions were subsumed into obligations. The licensee responded that these commitments were modified (i.e., inactivated) only recently as part of an effort to reduce unnecessary or obsolete commitments. At no time were the actions themselves discontinued. In each case, both the commitment and obligation were fulfilled, and the commitment was closed out properly, if late. Details of the late close-outs are contained in Table 3 of the attachment.

Discussions with CR-3 staff confirmed that changes to regulatory commitments are generally being handled in accordance with the guidance contained in NEI 99-04. In addition, the NRC

staff reviewed documentation from the licensee related to the items that involved changes to the commitments. The NRC staff found that, except for the examples detailed above, the licensee properly addressed each regulatory commitment change reviewed during this audit and has implemented an effective program to manage commitment changes.

2.3 Review to Identify Misapplied Commitments

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 (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).

2.3.1 Review of Safety Evaluation Reports for Licensing Actions since the Last Audit to Determine if they are Properly Captured as Commitments or Obligations

In addition to the commitments selected for the audit sample, all license amendment SEs, exemptions, and relief request SEs that have been issued for a facility since the last audit were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above.

One commitment reviewed presented a potential misapplication of a regulatory commitment by NRC staff. By letter dated February 8, 2012 (ADAMS Accession No. ML12003A217), the NRC staff submitted a request for additional information (RAI) for detailed information and failure mode reports for several systems relating to the license amendment request for an extended power uprate. In the RAI response dated March 19, 2012 (ADAMS Accession No. ML12081A293), the licensee submitted text providing further details about the systems and included a regulatory commitment to supply the failure mode reports by November 9, 2012. The information was provided to the NRC by the deadline, and the commitment was properly closed.

This created a potential misapplication in that the failure mode reports supplied to fulfill the regulatory commitment may have been relied on to make a safety decision. On further investigation, it was determined that the NRC staff did not improperly use the supplied failure mode reports to make a safety decision because (1) the information was requested by NRC staff correctly as part of an RAI and not volunteered by the licensee, and (2) the extended power uprate amendment was later withdrawn by CR-3 as part of its decision to permanently shut down. Consequently, the NRC staff never approved the proposed licensing action, rendering the issue moot, and the NRC staff could not misapply the information in the regulatory commitment. The submittal of the failure analysis reports should have been addressed as a deadline change for the RAI response and not a regulatory commitment on the docket.

2.4 Overall Audit Observations and Suggestions

During the audit, the NRC staff noticed the following points:

- (1) The PassPort database, while it has the capability to effectively manage regulatory commitments, is not intuitive or user-friendly.
 - a) PassPort is used for all plant activities, such as accounting and engineering work orders, in addition to commitment management. The PassPort database does not include an entry field which categorizes an activity and has limited search capability. For example, PassPort cannot search for and extract any document labeled as a regulatory commitment. In addition, PassPort is lacking insufficient fields to enter keywords or comments. Various CR-3 staff appeared to struggle to adequately describe actions or include comments about the commitment within the existing database framework.
 - b) The most efficient mechanism to extract specific information from PassPort is to know to enter the AR number. Because the AR number is assigned arbitrarily and PassPort has limited search capability, to gain maximum efficiency, licensee staff was prompted to track commitments with action request numbers by means outside of PassPort, such as makeshift documents, small note pads, or by staff memory.
 - c) Commitments initiated prior to the use of the PassPort database were not imported from NOCS into PassPort and were not assigned an AR number unless the status of the commitment was changed.
 - d) PassPort could not readily manage commitments designated as "ongoing." Instead, an ongoing commitment was initiated in PassPort for initial implementation. After initial implementation, the continued maintenance of the commitment activity was then shifted to the NOCS system. The necessity of this double system highlights an inadequacy in PassPort.
 - e) PassPort action requests are generally entered as single actions, which may be each assigned to different staff. If a commitment requires multiple actions to fulfill (e.g., plant modifications and revision of plant procedures), there is no readily available mechanism to collect the commitment actions under a single traceable umbrella. This creates the potential situation where all of the actions required by a commitment may be completed separately by several staff, but there is no recognition that the commitment itself has been completed, which may lead to late or failed closeout.
- (2) The NOCS system was designed for commitment management, and therefore, is more user-friendly toward tracking commitments. However, the system is outdated and not currently clear of older or hanging commitments that have been completed. Continuous upkeep is necessary to maintain tracking of the ongoing commitments that were initiated in NOCS or transferred from PassPort. In addition, at present, only one member of the licensing staff is well-versed in NOCS and no other staff member has adequate

knowledge of the system. If that staff member is not available, management of the CR-3 commitment program would pose a significant challenge to any unknowledgeable staff member.

- (3) There was some confusion in PassPort as to whether a commitment had been "closed," "completed," "cancelled," or inactivated. It was not clear whether the closure or completion applied to a single action or an entire regulatory commitment, or whether a "closed" commitment is being inactivated due to becoming obsolete or cancelled while in process. This is compounded by the fact that CR-3 is permanently shut down and undergoing transition to decommissioning. CR-3 is currently reevaluating its existing commitments and determining which commitments no longer apply to a permanently shutdown plant, and therefore, may be inactivated. It is important to correctly distinguish whether a commitment action has been closed because it was completed or inactivated or cancelled because it no longer applied to a decommissioning plant.
- (4) Despite the limitations of the PassPort and NOCS systems, CR-3 staff are generally managing regulatory commitments effectively. The examples described above detail discrepancies in tracking and recordkeeping of commitments, not in the fulfillment of the commitments. The actions themselves required by the commitments were assigned and carried out effectively and in a timely manner.

During the exit interview at the conclusion of the audit, the NRC staff and the CR-3 licensing engineer discussed ways to improve efficiency and traceability of the regulatory commitments in both the PassPort and NOCS databases, and to ensure that a regulatory commitment due date is not missed. As a result, the following items were suggested:

- (1) Continue to apply the NOCS system for ongoing commitments. Assign backup staff to learn the upkeep of the NOCS system to ensure continuity of maintenance. If no backup staff is available, current staff should write a detailed procedure, which can be followed by future staff without supervision.
- (2) Revise the REG-0110, Revision 1 procedure to include a set of definitions for words or descriptive phrases (e.g., "cancelled" or "inactivated") to be consistently used in PassPort by all staff to distinguish among completion, closeout, cancellation, inactivation, inapplicability due to permanent shutdown, or other types of commitment completion.
- (3) Revise the REG-0110, Revision 1 procedure to either adequately clarify the phrase "sunset clause" from Section 9.1.2 or, since the clause is rarely invoked, remove it entirely from the procedure.
- (4) When creating an assignment in PassPort to capture a regulatory commitment, include a reference to the letter number and letter date in which the regulatory commitment is contained to avoid over-dependence on an action request number.

- (5) For commitments which require multiple actions and multiple action requests in PassPort, devise a system whereby the completion of all required actions for the commitment is apparent and recognized, so that the commitment may be closed in a timely manner.

3.0 CONCLUSION

The NRC staff concludes that based on the above audit, (1) CR-3 has generally implemented NRC commitments on a timely basis, and (2) CR-3 has implemented an effective program for managing NRC commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Phil Rose, Lead Engineer- Licensing and Regulatory Programs
Dan Westcott, Supervisor - Licensing and Regulatory Programs

Principal Contributors: April L. Pulvirenti
Michael D. Orenak

Date: April 20, 2015

Attachment:
Commitment Audit Summary

COMMITMENT AUDIT SUMMARY

Table 1: Commitments that have been Closed Between 10/01/2011 and 10/01/2014

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
12/10/2007 3F1207-02	Response to Generic Letter 2004-02	"Crystal River Unit 3 Nuclear Generating Plant (CR-3) will be in compliance with the regulatory requirements of Generic Letter 2004-02."	After restart from Refueling Outage 16, to begin 09/26/2009.	137306-25	11/29/2012 PassPort entry in AR00137306.	Commitment fulfilled and properly documented.
10/11/2012 3F1012-07	License Amendment Request (LAR) for Extended Power Update (EPU)	"FPC [Florida Power Corporation] will provide (1) revised main control room (MCR) atmospheric dispersion factors (C/Q) for each design basis event reported in Section 2.9.2, 'Radiological Consequences Analyses,' of the CR-3 EPU Technical Report based on ARCON96 methodology described in Regulatory Guide 1.194; (2) as applicable, revised input assumptions associated with the MCR C/Q calculations; (3) revised MCR dose results for the loss of coolant accident and fuel handling accident; and (4) associated revisions to the applicable CR-3 Improved Technical Specifications and associated Bases."	12/20/2012	398992-38	12/18/2012 3F1212-06.	Commitment fulfilled and properly documented.
01/19/2012 3F0112-03	Response to EA-11-208	"Provide Operator training on the Low-Medium-High Valve Controllers (LMHVC) and the range of operation RM-A1/RM-A2 mid-range and high range monitors."	02/29/2012	474477	02/17/2012 NOCS 100515	Commitment fulfilled and properly documented.

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
11/21/2012 3F1112-06	Response to the Recom- mendation 2.3 Seismic Walkdown	"The remaining seismic inspection (8) will be completed and the updated report submitted to the NRC."	12/31/2014	571921	1/28/2014 Cancelled: Form A1-110-1-2 showing cancellation of work order task 02167472.	Commitment fulfilled and properly documented.
11/20/2009 NEI Project No. 689	NEI Industry Initiative on Buried Piping Integrity - Domestic Fleet Commitment	No formal commitment text. CR3 Buried Piping Integrity Initiative Implementation.	06/30/2012	389303	06/13/2012 PassPort 00389303	Commitment fulfilled.
03/19/2012 3F312-02	Response to second round of request for additional information (RAI) EICB review of EPU	FPC will provide a failure mode and effects analysis and a reliability report, which includes overall availability results, for the Inadequate Core Cooling Mitigation System.	11/09/2012	398992	11/07/2012 3F1112-02	Commitment fulfilled, but should have been handled through RAI process.
04/25/2013 3F0413-01	LAR to revise staffing post 50.82 letter	"CR-3 will vent and remove from service the Radioactive Waste Disposal System gas decay tanks."	08/30/2013	598095	09/28/2013 PassPort 598095	Commitment fulfilled and properly documented.

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
02/26/2014 3F0214-07	Response to RAI Administrative Control Technical Specification	"CR-3 will submit a revision to License Amendment Request #316, Revision 0, 'Revise and Remove License Conditions and Revision to Improved Technical Specification to Establish Permanently Defueled Technical Specifications,' to revise Technical Specifications 5.8.2 and 5.8.3 proposing wording that complies with the requirements of 10 CFR 20.1602."	08/15/2014	633444	05/07/2014 Additional changes proposed in revised LAR, documented in 3F0514-01.	Commitment fulfilled and properly documented.
12/20/2010 3F1210-05	LAR implementation date for overhead crane	"Spent fuel loading activities using the Auxiliary Building overhead crane (FHCR-5) shall not commence if an approaching or potential tropical storm, an approaching or potential hurricane, or a tornado watch or warning has been declared for the site in accordance with CR-3 site procedures. If spent fuel loading activities with FHCR-5 are in progress when any of the above criteria are met, the load will be lowered to a safe location. Auxiliary Building overhead crane GHCR-5 will be moved to the south end of the Auxiliary Building, away from the spent fuel pools, and the crane secured."	Procedures will be modified and implemented and training conducted, as needed, prior to designating FHCR-5 as a single failure proof crane.	438875	06/26/2012 Secure Crane: PassPort 05/10/2012 Procedures and training: postponed in Amendment No. 241 (ADAMS Accession No. ML12136A392). Also documented in PassPort 05/10/2012. Will be moved to NOCS.	Commitment fulfilled and properly documented. NOTE: Physical modifications to convert FHCR-5 as single failure proof currently underway and seen during plant walkdown.

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
10/08/1995	Response to Generic Letter 88-18	"FPC has elected to utilize an optical disk imaging system for storage and retrieval of quality assurance records. This system is in addition to hardcopy storage and storage on microfilm, but will be our primary means of records storage. We have addressed each of the appropriate quality controls noted in Generic Letter 88-18 in implementing procedures."	Deleted in NOCS, improperly closed.	NOCS 062372	08/12/2002	Improper closeout.

Table 2: New Commitments that have been Opened since 10/01/2011

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
03/28/2014 3F0314-01	Response to RAI dated 02/20/2014	"CR-3 will incorporate the requirement to complete the review of Emergency Action Levels (EALs) with the State of Florida and local governmental authorities on an annual basis in a revision to the Permanently Defueled Emergency Plan (PDEP) in the response to the PDEP RAI."	09/25/2014	676353	05/23/2014 3F514-03, Attachment 2	Commitment fulfilled and properly documented.
01/19/2012 3F0112-10	LAR fuel oil diesel feedwater pump	"Proposed Technical Specification limits for the DFT-4 fuel oil storage tank level will be administratively maintained until the license amendment is implemented."	In place and will be maintained.	448253	03/01/2011 Initiated in PassPort. Maintained in NOCS, deactivated in NOCS 04/18/2012.	Commitment fulfilled and properly documented.
09/19/2012 3F0912-08	Relief request suspend containment surveillance during repair	"CR-3 will submit a proposal for alternatives to the requirement in ASME Section XI Subsection IWL in accordance with 10 CFR 50.55a(a)(3)(i) to establish surveillance program for the repaired containment concrete and unbonded post-tensioning system."	One year prior to completion of CR-3 containment repair.	485491	02/28/2013 Documented in PassPort.	Commitment fulfilled and properly documented.

Table 3: Changed Commitments Identified as Late Closeout

Letter Date Letter Number	Commitment Category	Commitment Text. Exact text in quotation marks.	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
05/02/1980 3F0580-02	Response to Confirmatory Order dated 04/14/1980 for loss of non-nuclear instrumentation power	Several commitments to perform training on non-nuclear instrumentation. Commitment was fulfilled and ongoing. Commitment was subsequently INACTIVATED because this training is now governed by 10 CFR 50.120, issued August 28, 1997, requiring a Systematic Approach to Training.	---	NOCS 8664	01/05/2012 - 01/05/2014 Commitment Change Report, 05/29/2014.	Change was justified and implemented correctly. Closed out 15 years late.
04/09/1985 3F0485-07	Response to Generic Letter 82-12	Several commitments limiting work hours and overtime hours. Commitment was INACTIVATED because work hours are now governed by 10 CFR 26 Subpart I, issued March 31, 2008.	---	NOCS 926	01/05/2012 - 01/05/2014 Commitment Change Report, 05/29/2014.	Change was justified and implemented correctly. Closed four years late.
12/15/1980 3F0514-08	Response to Generic Letter 82-12	Florida Power Corporation committed to the limitation of overtime for nuclear power plant operators. Commitment was INACTIVATED because work hours are now governed by 10 CFR 26 Subpart I, issued March 31, 2008.	---	NOCS 1036	01/05/2012 - 01/05/2014 Commitment Change Report, 05/29/2014.	Change was justified and implemented correctly. Closed out four years late.

Table 4: Ongoing Commitments

Letter Date Letter Number	Commitment Category	Commitment Text Exact text in quotation marks	Scheduled Completion Date	Action Request Number	Resolution Date Documentation	Conclusion
10/17/1986 3F1086-12		"The Nuclear Compliance Department will verify completion of correction action associated with NRC violations and deviations. In addition, the nuclear compliance department will verify that committed corrective actions are completed as specified in the response."	Ongoing	NOCS 40018	05/22/2001 Updated in NOCS	Commitment fulfilled – proper documentation and continuing compliance.
02/12/2007 3F0207-02	Response to 2006 Phase 2 and 3 Mitigation Strategies	"CR-3 will include the SFP [spent fuel pool] internal makeup, external makeup and external spray strategies as described in the general description in Attachment 1 in plant procedures."	12/31/2007	N/A	12/07/2007 Plant Operating Manual AA-0005	Commitment fulfilled – proper documentation and continuing compliance.
09/16/1999 3F0999-07	LAR SFP storage configuration	Carborundum coupon surveillance.	Ongoing	NOCS 001520	Ongoing SP-292	Commitment fulfilled - proper documentation and continuing compliance.

T. Hobbs

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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. 50-302

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DATE	04/13/15	04/13/15	04/06/15
OFFICE	NRR/DORL/LPL4-2/LA	NRR/DORL/LPL4-2/BC	NRR/DORL/LPL4-2/PM
NAME	PBlechman	MKhanna	MOrenak
DATE	04/08/15	04/16/15	04/20/15

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