



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

May 27, 2015

Mr. Paul Fessler, Senior VP  
and Chief Nuclear Officer  
DTE Electric Company  
Fermi 2 - 210 NOC  
6400 North Dixie Highway  
Newport, MI 48166

SUBJECT: FERMI 2 – AUDIT OF THE LICENSEE'S MANAGEMENT OF REGULATORY  
COMMITMENTS (TAC NO. MF5553)

Dear Mr. Fessler:

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), the U.S. Nuclear Regulatory Commission (NRC) informed licensees that the Nuclear Energy Institute (NEI) document NEI 99 04, "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's 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 if regulatory commitments are being effectively implemented.

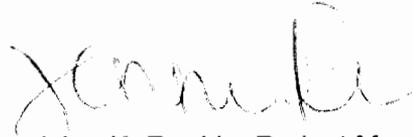
An audit of the Fermi 2 commitment management program was performed at the plant site on May 12 - 14, 2015. The NRC staff concluded that, based on the audit, Fermi 2 has implemented NRC commitments on a timely basis, and has implemented an effective program for managing commitment changes. Details of the audit are set forth in the enclosed audit report.

P. Fessler

- 2 -

Please feel free to contact me at (301) 415-1530 if you have any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennivine K. Rankin". The signature is written in a cursive, flowing style.

Jennivine K. Rankin, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:  
Audit Report

cc w/encl: Distribution via ListServ



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

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

DTE ELECTRIC COMPANY

FERMI 2

DOCKET NO. 50-341

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, 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 three years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and if regulatory commitments are being effectively implemented. An audit of the Fermi 2 commitment management program was performed at the plant site during May 12 - 14, 2015. The audit reviewed commitments made, changed, or closed since the previous audit conducted during the period July 31, 2012 through August 3, 2012.

NRR guidelines direct the 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 (i.e., amendments, reliefs, exemptions, etc.) and activities (i.e., bulletins, generic letters, etc.).

2.0 AUDIT PROCEDURE AND RESULTS

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

Enclosure

## 2.1 Verification of Licensee's Management and Implementation of 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 (i.e., amendments, exemptions, etc.), or licensing activities (i.e., bulletins, generic letters, etc.). Commitments made in licensee event reports or in response to Notices of Violation may be included in the sample, but the review will be limited to verification of restoration of compliance, not the specific methods used. Before the audit, the NRC staff searched ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification.

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

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

### 2.1.2 Audit Results – Implementation of NRC Commitments

The licensee has implemented procedure MLS10, Revision 13, "Regulatory Action and Commitment Tracking," which describes the methods for managing NRC commitments in the Regulatory Action and Commitment Tracking System (RACTS) database at Fermi 2. The NRC staff compared the guidance in MLS10, Revision 13 to the guidance in NEI 99-04. As a result of the comparison, the NRC staff found that the Fermi 2 procedure was generally consistent with the NEI guidance for identifying, managing, and closing commitments.

The audit 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 affected design features or operating practices require evaluation in accordance with the commitment change control process.

The documents furnished by the licensee during the audit included RACTS summary sheets providing the status of the commitments and appropriate implementing documentation, as needed (i.e. procedure revisions, completed work orders, memorandums, commitment change evaluation forms). The NRC staff reviewed the documents and summarized the selected commitments in the attached Audit Summary.

The NRC audit confirmed that the licensee has documented its implementation of regulatory commitments made to the NRC staff as part of past licensing actions. The NRC staff notes that there is an inconsistency in the time that regulatory commitments are entered into the commitment management program. MLS10, Revision 13, indicates that commitments are entered into the program upon receipt of the NRC correspondence (i.e., NRC safety evaluations (SEs)); however, the NRC staff noted that some regulatory commitments are entered into the system prior to receiving the NRC SE and some are entered into the system afterwards. The NRC did not identify any regulatory commitments that were not satisfied or incorporated into its commitment management program for implementation (after receipt of an NRC SE). The NRC discussed this inconsistency with the licensee.

Licensee personnel were able to demonstrate effective use of the commitment management database and provided status tracking to the applicable implementation documents. The NRC staff found that generally, the selected commitments in the audit sample were effectively implemented. Using the RACTS as a starting point, the NRC staff sought to determine that commitments were implemented in documents such as plant procedures, or in appropriate engineering packages. In addition, the NRC audit confirmed that the process to close out commitments and provide sufficient justification for closure was adequate. The attached Audit Summary provides details of the audit and its results.

Based on the above, the NRC staff concludes that the licensee has implemented the regulatory commitments management program effectively in accordance with LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC," and consistent with NEI 99-04.

## 2.2 Verification of the Licensee's Program for Managing 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 Fermi 2 is contained in DTE Electric Company's MLS10, Revision 13. The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC.

### 2.2.1 Audit Results – Managing NRC Commitment Changes

The audit sample included one commitment that was expanded and two commitments that were classified as “deleted.” At Fermi 2, commitments can be deleted if the commitment was incorrectly classified as an ongoing commitment; or if the committed action is met and the subject of the commitment is not being altered and the commitment is greater than 2 years old (i.e., Sunset Deleted). The attached Audit Summary provides details of this portion of the audit and its results.

Based on the review of the reports provided by the licensee as described above, the accompanying change review and tracking forms provided during the audit, the NRC concludes that the licensee has established effective administrative controls for managing NRC 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 associated with a licensing action. Reliance on an action to support a regulatory decision must be elevated from a regulatory commitment to a legal obligation (e.g., license condition, condition of a relief request, regulatory exemption limitation or condition). A commitment is also considered to have been misapplied if the commitment involves actions that were safety significant (i.e., commitments used to ensure safety).

Each of the commitments selected for the audit sample were reviewed to determine if any had been misapplied. No misapplied commitments were identified within the audit scope.

#### 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 safety evaluations, exemptions and relief request safety evaluations 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. There were no misapplied commitments found in the NRC staff evaluations for amendments, exemptions, relief requests, or other licensing tasks since the last commitment management audit.

### 3.0 CONCLUSION

The NRC staff concludes, based on this audit, that the licensee has (1) an effective program for managing and implementing regulatory commitments, and (2) an effective program for managing changes to regulatory commitments.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Jason Haas  
Sam Hassoun

Principal Contributors: J. Rankin, K. Green

Date of issuance: May 27, 2015

Attachment: Summary of Audit Results

Audit Summary  
DTE Electric Company  
Fermi 2  
Docket No. 50-341

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20303	DTE will follow the guidance established in Section 11 of NUMARC 93-01, "Industry Guidance for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" Nuclear Management and Resource Council, Revision 3, July 2000.	Letter NRC-13-0001, dated January 11, 2013 (ADAMS Accession No. ML13014A125)  MMR02, Revision 4, "Maintenance Rule Program Description."	Ongoing – Closed  Due Date: 3/18/14  Completed: 3/3/14	Closed. Verified that Section 1.2 of MMR02, Rev. 4 is consistent with NUMARC 93-01, Section 11.
20304	DTE will follow the guidance established in TSTF-IG-05-02, Revision, "Implementation Guidance for TSTF-423, Revision 1, Technical Specifications End States, NEDC-32988-A."	Letter NRC-13-0001, dated January 11, 2013 (ADAMS Accession No. ML13014A125)  24.000.01, Revision 70, "Situational Surveillances/LCO Action Tracking."  MMR12, Revision 16, "Equipment Out of Service Risk Management."  22.000.04, Revision 73, "Plant Shutdown From 25% Power."	Ongoing – Closed  Due Date: 3/18/14  Completed: 3/3/14	Closed. Verified procedures were updated to reflect Amendment 194 mode 3/end states. MMR12, Revision 16 revised appropriately and annotated with RACTS number to indicate changes to the procedure correlate with a regulatory commitment.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20305	Limitations regarding operation with an inoperable LEFM system will be included in the TRM.	<p>Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)</p> <p>Technical Requirements Manual, Volume I</p>	<p>Ongoing – Closed</p> <p>Due Date: Prior to startup from the sixteenth refueling outage</p> <p>Completed: 3/28/14</p>	<p>Closed. The startup from the RF16 outage was on 4/5/14. Verified the TRM TR 3.3.7.3, "Feedwater Flow Instrumentation" was updated with limitations for inoperable LEFM system.</p>
20306	A process will be implemented to use the LEFM feedwater flow to adjust or correct the existing feedwater flow venturi-based signals.	<p>Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)</p> <p>23.615.04, Revision 6, "Leading Edge Flow Meter (LEFM)"</p>	<p>Ongoing – Closed</p> <p>Due Date: Prior to startup from the sixteenth refueling outage</p> <p>Completed: 3/24/14</p>	<p>Closed. The startup from the RF16 outage was on 4/5/14. Verified the System Operating Procedure 23.615.04 was revised to add LEFM to Venturi correction factor and changed core power to 3486 MWt based on LEFM providing more accurate feedwater flow input to the core thermal power calculations.</p>

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20307	Plant maintenance and calibration procedures will be revised to incorporate Cameron's maintenance and calibration requirements. Initial preventive maintenance scope and frequency will be based on vendor recommendations.	Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)  Condition Assessment Resolution Document action 13-20171-17	Ongoing – Closed  Due Date: Prior to startup from the sixteenth refueling outage  Completed: 3/24/14	Closed. The startup from the RF16 outage was on 4/5/14. Verified CARD 13-20171-17 documents Cameron's vendor recommendations and associated Fermi 2 PM events: UT feedwater piping downstream of LEFM every 18 months (PM Events F602 and F604), calibration of the feedwater pressure instruments per manufacturer's recommendations for frequency (PM Events Y822 and Y823), and checks of the RTDs per manufacturer's recommendations for frequency (PM Events Y824, Y825, Y826, and Y827).
20308	Modifications for the power uprate will be implemented.	Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)  MIC WO No: 35443469, "MIC WO: EDP-36969"	One Time – Closed  Due Date: Prior to startup from the sixteenth refueling outage  Completed: 3/26/14	Closed. Verified that the associated Work Orders were all complete and returned to service by 3/26/14.  Noted that part of the scope was missed during initial implementation. A corrective action resolution document was issued to capture needed revisions to the Power to Flow Map and created the associated work order. The work order was completed on 5/7/14.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20309	Necessary procedure revisions for the power uprate will be completed.	Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)  Licensing Change Request 12-046-OPL	Ongoing – Closed  Due Date: Prior to startup from the sixteenth refueling outage  Completed: 3/25/14	Closed. The startup from the RF16 outage was on 4/5/14. Verified in LCR 12-046-OPL a list of documents required for implementation of the MUR were certified to have been revised 3/19/14.
20310	The plant simulator will be modified for the uprated conditions and the changes will be validated in accordance with plant configuration control processes.	Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)  NANT-14-0029, "Simulator MAR2014 Configuration Update	One Time – Closed  Due Date: Prior to startup from the sixteenth refueling outage  Completed: 3/24/14	Closed. The startup from the RF16 outage was on 4/5/14. NANT-14-0029, dated 3/19/14 described the updated simulator configuration will be made available for training use on March 28, 2014 and that the Cycle 17 core model update and modifications associated with the MUR were included in the update.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20311	Operator training will be completed prior to implementation of the proposed power uprate changes.	<p>Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)</p> <p>Just-in-Time Training LP-GN-909-1131AC, Revision 0.</p> <p>Condition Assessment Resolution Document 13-20404-121</p>	<p>One Time – Closed</p> <p>Due Date: Prior to startup from the sixteenth refueling outage</p> <p>Completed: 1/2/14</p>	Closed. The startup from the RF16 outage was on 4/5/14. Verified that Just-in-Time Training LP-GN-909-1131AC contained modifications to support MUR Power Uprate.
20312	Plant testing for the proposed changes will be completed as described in NRC-13-004, Enclosure 7, Section 10.4, "Testing."	<p>Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)</p> <p>IPTE 13-06, Revision 0, "Infrequently Performed Test or Evolution Review and Approval Request"</p>	<p>One Time – Closed</p> <p>Due Date: 5/30/14</p> <p>Completed: 5/13/14</p>	Closed. Verified that feedwater response and pressure regulator response at 3 distinct power levels was tested and data was collected. Results documented in IPTE 13-06. IPTE 13-06 completed on 5/13/14.
20313	Plant-specific analyses for all potentially limiting events will be performed on a cycle specific basis as part of the reload licensing process.	<p>Letter NRC-13-0004, dated February 7, 2013 (ADAMS Accession No. ML13043A659)</p> <p>0000-0158-9424-SRLR, Revision 0, "Supplemental Reload Licensing Report for Enrico Fermi 2, Reload 16 Cycle 17"</p>	<p>One Time – Closed</p> <p>Due Date: Prior to startup from the sixteenth refueling outage</p> <p>Completed: 11/1/13</p>	Closed. Verified that 0000-0158-9424-SRLR contains cycle specific analyses for the limiting events.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
89639	From ASME Section XI, IWA-6000, submit to NRC Inservice Inspection Summary Report within 90 days of completion of the inspections.	Letter NRC-14-0024, dated July 2, 2014 (ADAMS Accession No. ML14183B531)	Ongoing - Closed  Due Date: 90 days after RF16  Completed: 7/02/14	Closed for RF16. The startup from the RF16 outage was on 4/5/14. Verified that NRC-14-0024 contains the required ASME ISI Summary Report, and that it was submitted within 90 days of the completion of RF16.
20360	Demonstration of compliance with Open Phase Condition (OPC) criteria through analysis or identify appropriate actions required to demonstrate compliance by 12-31-14 (see BL 2012-01, NRC-14-0007, and NEI letter to NRC (ADAMS Accession No. ML13333A147)	Condition Assessment Resolution Document (CARD) 12-21132, "Evaluate OE35219 (Preliminary – Automatic Reactor Trip and Loss of Offsite Power Due to Failed Switchyard Insulator) for applicability to Fermi"  CARD 12-26431, "NRC Bulletin 2012-01, Design Vulnerability in Electric Power System"  Letter NRC-14-0007, dated January 30, 2014 (ADAMS Accession No. ML14031A434)	One Time – Closed  Due Date: 12/31/14  Completed: 12/19/14  10/24/12 (response to Bulletin 2012-01); 1/30/14 (response to RAI)	Closed. The licensee performed an investigation and further analysis, and identified action items to demonstrate compliance with the OPC criteria. Additionally, the licensee responded to the Bulletin and subsequent RAIs. NRC-14-0007 contains responses to RAIs asked in reference to Bulletin 2012-01. In the response to an RAI, DTE Energy stated that it has committed to the schedule provided in the Industry OPC Initiative, and it is DTE's intention to meet the milestones of the schedule.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
88047	IE 87-028-04 Violation Response: Revise Procedure 12.000.53 to provide clarification on how to identify which instruments should be considered tech spec related and treated as safety related.	Document Change Request (DCR) 12- 1020, dated 10/19/12: MES03 Revision 8, "Identification of QA Level 1 and QA Level 1M Structures, Systems, and Components"	One Time – Closed  Due Date: 1/30/88  Completed: 5/21/13	<p>This commitment was originally selected because it was identified by the licensee as "deleted." According to the licensee's procedure for commitments (MLS10, Revision 13), commitments can be deleted if the commitment was incorrectly classified as an ongoing commitment; or if the committed action is met and the subject of the commitment is not being altered and the commitment is greater than 2 years old (i.e., Sunset Deleted).</p> <p>The NRC staff reviewed the commitment and determined that Procedure MES03 contains guidelines to use in determining which structures, systems, and components are safety related. DCR 12-1020 documents the history of the commitment and ultimately the revision to MES03, from which the commitment was deleted. The DCR identified that RACTS item 88047 (the commitment) can be reclassified as one-time closed. Per MLS10, the commitment can be deleted. The completion date noted is the date on which MES03 was revised.</p> <p>12.000.53, Revision 5 was issued on 1/28/88</p>

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
95144	LER 95-007 included the following commitment: Existing procedures will be revised or new procedures will be developed to ensure positive verification that after the EDG starts, the 480-volt MCC automatically connected loads are energized through the load sequencer.	<p>Letter NRC 95-0109, dated October 27, 1995 (LER)</p> <p>DCR 10-1603 for Procedure 24.307.41, Revision 25 "Functional Test of EDG 11 Load Sequencer MCC Contacts"</p> <p>DCR 10-1604 for Procedure 24.307.42, Revision 25 "Functional Test of EDG 12 Load Sequencer MCC Contacts"</p> <p>DCR 10-1605 for Procedure 24.307.43, Revision 25 "Functional Test of EDG 13 Load Sequencer MCC Contacts"</p> <p>DCR 10-1606 for Procedure 24.307.44, Revision 25 "Functional Test of EDG 14 Load Sequencer MCC Contacts"</p>	<p>One Time – Closed</p> <p>Due Date: Startup from next plant outage (i.e., RF5 - 1/3/97)</p> <p>Completed: 10/30/13</p>	<p>This commitment was originally selected because it was identified by the licensee as "deleted." According to the licensee's procedure for commitments (MLS10, Revision 13), commitments can be deleted if the commitment was incorrectly classified as an ongoing commitment; or if the committed action is met and the subject of the commitment is not being altered and the commitment is greater than 2 years old (i.e., Sunset Deleted).</p> <p>Procedures were originally revised on 12/12/96. Procedures were subsequently updated on 10/30/13 and the commitment was changed to one-time closed. This commitment was subsequently "sunset deleted" in accordance with MLS10 because the committed action was met and the commitment was greater than 2 years old.</p>

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20295	Assets not currently available for inspection will be inspected no later than during refueling outage 16 (RF16), currently scheduled for the first quarter of 2014. These assets are listed in Appendix E of the Fermi 2 Seismic Walkdown Report.	<p>Letter NRC-12-0075, November 26, 2012 (ADAMS Accession No. ML12341A362)</p> <p>CARD 12-24852, "Fukushima Response - NRC Request for Information Concerning Seismic Hazard Reevaluations and Walkdowns," dated 5/31/12</p> <p>CARD 12-24852-08, "RF16 - Seismic Walkdown of inaccessible assets," dated 12/03/12</p>	<p>One Time – Closed</p> <p>Due Date: 3/30/14</p> <p>Completed: 3/19/14</p>	Closed. CARD 12-24852-08 documents that seismic walkdowns of previously unavailable assets were completed on March 19, 2014 (during RF16).
20297	Watertight door RB-1 (A7000Y033) will be inspected during refueling outage 16 (RF16), currently first quarter of 2014) scheduled for the first quarter of 2014.	<p>Letter NRC-12-0076, dated November 26, 2012 (ADAMS Accession No. ML12331A202)</p> <p>Internal Memo TMPE-14-0108, "Fukushima Flood Response, Completion of Visual Inspection of "Restricted Access" Item Watertight Door RB-1 (A7000Y033), NEI 12-07 Walkdown Record Form Revision</p> <p>WO35334258 – Work Order for Inspection</p> <p>WO35241635 – Work Order for Repair</p>	<p>One Time – Closed</p> <p>Due Date: RF16 (currently scheduled for first quarter of 2014)</p> <p>Completed: 3/25/14</p>	Closed. The startup from the RF16 outage was on 4/5/14. Reviewed TMPE-14-0108 which provided a summary of activities performed to support completion of the commitment. Also reviewed the associated Work Orders which showed completion of the inspection and subsequent completion of the repairs.

RACTS No.	Description of Commitment	Documents Reviewed	Status	Auditor's Assessment
20298	The results of the inspection of watertight door RB-1 will be submitted within 90 days of the outage completion.	<p>Letter NRC-12-0076, dated November 26, 2012 (ADAMS Accession No. ML12331A202)</p> <p>Letter NRC-14-0042, dated June 30, 2014 (ADAMS Accession No. ML14181B168)</p>	<p>One Time – Closed</p> <p>Due Date: 90 days following completion of RF16</p> <p>Completed: 6/30/14</p>	Closed. The startup from the RF16 outage was on 4/5/14. Verified NRC-14-0042 contained results of inspection of watertight door RB-1 (A7000Y003), the degraded condition was entered into the plant corrective action program, and the door frame was repaired and the seal was replaced.
99060	Per DECO Commitment in Letter NRC-99-0104, Fermi will comply with all three phases of the Motor Operated Valve Periodic Verification Joint Owner's Group (JOG).	<p>Letter NRC-99-0104 dated 12/22/1999</p> <p>Commitment Change Evaluation Summary (MLS10002)</p> <p>Letter NRC 12-0067 dated November 5, 2012 (ADAMS Accession No. ML12318A302)</p> <p>47.306.05, Revision 4, "MOV Performance Evaluation Program Cycle Selection." Dated 8/7/12</p> <p>Internal Memo TMIS-12-0083, "Scope of MOVs to be Tested in Cycle 16 and 17 for Generic Letter 96-05"</p>	<p>Ongoing – Closed</p> <p>Due Date: 9/25/12</p> <p>Completed: 8/7/12</p>	<p>Reviewed commitment change evaluation summary. The commitment is expanded to cover periodic verification of 5 additional Class D MOVs, not originally included in the JOG commitment. NRC notified of commitment change in licensee letter NRC 12-0067.</p> <p>Reviewed 47.306.05, Revision 4 and confirmed procedure was revised to incorporate instruction to determine the testing scope and test interval. Reviewed TMIS-12-0083 and confirmed a sample of the additional Class D MOVs were included in the valves to be tested during Cycle 16 and Cycle 17.</p>

P. Fessler

- 2 -

Please feel free to contact me at (301) 415-1530 if you have any additional questions or concerns.

Sincerely,

**/RA/**

Jennivine K. Rankin, Project Manager  
Plant Licensing Branch III-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosure:  
Audit Report

cc w/encl: Distribution via ListServ

**DISTRIBUTION:**

PUBLIC LPL3-1 R/F  
RidsNrrDorIDpr Resource  
RidsNRRPMMFermi2 Resource  
RidsRgn3MailCenter Resource

RidsAcrcsAcnw\_MailCTR Resource  
RidsNrrDorLpl3-1 Resource  
RidsNrrLAMHenderson Resource

**ADAMS Accession No.: ML15139A301**

OFFICE	DORL/LPL3-1/PM	DORL/LPL3-1/PM	DORL/LPL3-1/LA	DORL/LPL3-1/BC	DORL/LPL3-1/PM
NAME	JRankin	KGreen	MHenderson (SFigueroa for)	DPelton	JRankin
DATE	5/19/2015	5/20/2015	5/19/2015	5/27/2015	5/27/2015

**OFFICIAL RECORD COPY**