



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

December 14, 2015

Mr. Robert Braun
President and Chief Nuclear Officer
PSEG Nuclear LLC - N09
P.O. Box 236
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION AND SALEM NUCLEAR
GENERATING STATION, UNIT NOS. 1 AND 2 - AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (CAC NOS. MF6266,
MF6227, AND MF6228)

Dear Mr. Braun:

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary 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 and encouraged licensees to use the NEI guidance, or similar administrative controls, to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented. An audit of the commitment management program for Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2, was performed on-site during the period from June 15, 2015, through June 17, 2015. The previous audit of the licensee's commitment management program was documented in an NRC letter dated January 30, 2012.

As discussed in the enclosed audit report, the NRC staff concludes that the licensee's procedures used to manage commitments provide the necessary attributes for an effective commitment management program and that the licensee has effectively implemented the commitment management program. The NRC staff does note that due to two procedures providing different guidance for annotating commitments, commitments have been improperly annotated in several instances. This has been entered into the licensee's corrective action program.

R. Braun

If you have any questions, please contact me at (301) 415-1603 or Carleen.Parker@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Carleen J. Parker". The signature is written in a cursive style with a large, stylized "C" and "P".

Carleen J. Parker, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-354, 50-272, and 50-311

Enclosure:
Audit Report

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

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

PSEG NUCLEAR LLC

HOPE CREEK GENERATING STATION AND

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-354, 50-272, AND 50-311

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" (ADAMS Accession No. ML003680088), contains acceptable guidance for controlling regulatory commitments and encourages 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 (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. 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. 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.).

An audit of the commitment management program for Hope Creek Generating Station (Hope Creek) and Salem Nuclear Generating Stations, Unit Nos. 1 and 2 (Salem) was performed on-site during the period from June 15, 2015, through June 17, 2015. The previous audit of the licensee's commitment management program was documented in an NRC letter dated January 30, 2012 (ADAMS Accession No. ML120100421).

Enclosure

2.0 AUDIT PROCEDURE AND RESULTS

The NRC staff reviewed commitments made during the period of approximately 3 years prior to the audit (i.e., from the last audit). 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 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 review period and selected a representative sample for verification. The commitments included in the review are shown in Table 1.

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 (TSs), and updated final safety analysis reports (UFSAR). 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 provides the specific details and results of the audit for verification of the licensee's implementation of commitments.

The NRC staff found that procedures AD-AA-101-1002, Revision 15, "Writer's Guide and Process Guide for Procedures and T&RMS [Training & Reference Materials]," and AD-AA-101-1003, Revision 3, "Implementing Procedure Writers Guide," provide different guidance for annotating commitments in procedures. Station implementing procedures are not required to adhere to writers guide AD-AA-101-1002. AD-AA-101-1003 applies to existing station specific implementing procedures, but it is not applicable to procedures and T&RMs written in accordance with procedure AD-AA-101-1002. AD-AA-101-1003 is not referenced in Procedure LS-AA-110, "Regulatory Commitment Management." Procedure LS-AA-110, step 4.3, only references AD-AA-101-1002 for annotating and controlling commitments. This has led to improper annotation of some commitments. PSEG Nuclear LLC (PSEG) has entered this into its corrective action program (Notifications 20694048 and 20694050).

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 Hope Creek and Salem is contained in the following licensee procedures: (1) LS-AA-110, Revision 9, "Regulatory Commitment Management"; (2) LS-AA-110-1001, Revision 2, "Regulatory Commitment Management Guidance"; (3) AD-AA-101-1002, Revision 15, "Writer's Guide and Process Guide for Procedures and T&RMs"; and (4) AD-AA-101-1003, Revision 3, "Implementing Procedure and Writers Guide."

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

The NRC staff reviewed the licensee's procedures associated with the commitment management program (listed in Section 2.2 above) against NEI 99-04. The NRC staff found that the process described in the procedures generally follows the guidance of NEI 99-04 and provides detailed instructions for (1) identifying commitments, (2) tracking commitments, (3) annotating implementing documents to provide traceability of commitments, (4) changing commitments, and (5) periodic reporting of commitment status. The NRC staff concludes that the procedures used by the licensee to manage commitments provide the necessary attributes for an effective commitment management program.

An important feature of the licensee's program is a requirement that the commitment tracking coordinator perform an annual review of the station/corporate commitment list to ensure the accuracy of the list and to verify that ongoing commitments are properly annotated in

implementing documents (reference Section 4.5.3 of Procedure LS-AA-110-1001). The NRC staff requested that the licensee provide the annual reviews performed in the last 3 years. Reviews were performed by PSEG for Hope Creek and Salem in 2012, 2013, and 2014, as documented in Orders 70147068/0010, 70161563, and 80112462, respectively. The reviews performed documented several issues which were entered into the corrective action program.

Table 2 provides the specific details and results of the audit of commitment changes for Hope Creek and Salem.

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 was reviewed to determine if any had been misapplied. The NRC staff did not identify any misapplied commitments.

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. The NRC staff did not identify any misapplied commitments in these documents.

3.0 CONCLUSION

The NRC staff concludes, based on the above audit, that the licensee's procedures used to manage commitments provide the necessary attributes for an effective commitment management program, and the licensee has effectively implemented the commitment management program. The NRC staff does note that due to two procedures providing different guidance for annotating commitments, commitments have been improperly annotated in several instances.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Paul Duke, Licensing Manager
Lee Marabella, Licensing Engineer

Principal Contributor: C. Parker

Date:

Attachments:

1. Table 1 – NRC Audit of Commitments Related to Hope Creek and Salem Licensing Actions and Licensing Activities
2. Table 2 – NRC Audit of Commitment Changes for Hope Creek and Salem

Summary of Audit Results
Audit of Management of Licensee's Commitment Management Program
Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2
Docket Nos. 50-354, 50-272, and 50-311

TABLE 1

Item No.	PSEG Nuclear LLC (PSEG) Submittal (ADAMS Accession No.) ----- NRC Issuance (ADAMS Accession No.)	Commitment as Stated in PSEG Submittal (PSEG Tracking No.)	Audit Results - Verification of Licensee's Implementation of Commitment
1	Letter LR-N11-0045 for Hope Creek dated 2/14/11 (ML110460135) ----- Hope Creek Amendment No. 188 dated 03/25/11 (ML110610501)	The submittal made four commitments as follows: 1. When either the A or B emergency diesel generator (EDG) is removed from service for an extended 14-day allowed outage time (AOT), both high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) shall be operable. (CM-HC-2011-815) 2. Any component testing or maintenance that increases the likelihood of a plant transient shall be avoided during the extended 14-day AOT. This encompasses work activities categorized as Production Risk 9. (CM-HC-2011-816) 3. Voluntary entry into this extended 14-day AOT should not be scheduled if adverse weather conditions are expected. (CM-HC-2011-817) 4. Operating crews will be briefed on the EDG work plan and procedural actions regarding	Observation: Although the licensee revised procedure OP-HC-108-115-1001 to incorporate commitments made in PSEG letter LR-N11-0045, dated February 14, 2011, the licensee did not properly annotate the reference section with the applicable step and station for the commitments in accordance with PSEG's commitment management program procedures. Annotation of programmatic commitments is necessary to help preclude deletion or changes to commitments without the necessary changes. Discussion: All four of these commitments are incorporated into procedure OP-HC-108-115-1001, Rev. 28, "Operability Assessment and Equipment Control Program." Although this procedure was revised to incorporate the commitments, it did not properly annotate the commitments in the reference section.

		<p>loss-of-offsite-power LOOP and station blackout (SBO) prior to entering the extended 14-day EDG AOT. (CM-HC-2011-818)</p> <p>The submittal stated these are programmatic commitments (i.e., not one-time actions).</p>	<p>PSEG procedure LS-AA-110, Rev. 9, "Regulatory Commitment Management," Section 4.3, requires programmatic commitments (e.g., ongoing commitments) be annotated in the associated implementing documents. PSEG procedure AD-AA-101-1002, Rev. 15, "Writer's Guide and Process Guide for Procedures and T&RMS," Section 4.9.9.A, requires that the applicable step where the commitment is addressed be included in the reference section and to list the commitments separately by station.</p> <p>Since these commitments were programmatic commitments, procedure OP-HC-108-115-1001 should have been annotated to indicate where the commitments are addressed within the procedure and the commitments should have been listed by station.</p> <p>PSEG has entered this into its correction action program (Notification 20694079).</p> <p>During the previous commitment audit, it was noted that these commitments were not properly annotated, specifically that the commitment numbers were not included. This issue was corrected prior to this commitment audit, and the commitment numbers were properly annotated in procedure OP-HC-115-1001, Rev. 28.</p>
2	<p>Letter LR-N11-0308 for Hope Creek and Salem, Units Nos. 1 and 2 dated 11/30/2011 (ML113350245) -----</p>	<p>The submittal made three commitments as follows:</p> <ol style="list-style-type: none"> 1. Incorporate as necessary, and maintain in corporate procedures, the entry conditions necessary to sequester site personnel that are consistent with the conditions specified in the exemption request. 	<p>Observation:</p> <p>Although the licensee revised procedure OP-AA-108-111-1001 to incorporate commitments made in PSEG letters LR-N11-0308, dated November 30, 2011, and</p>

	<p>Exemption dated 10/26/2012 (ML12299A081)</p>	<p>(CM.CC.2011-840)</p> <p>2. Maintain in site or corporate procedures provisions for ensuring that personnel not performing duties are provided an opportunity, as well as accommodations, for restorative rest. (CM.CC.2011-841)</p> <p>3. Incorporate as necessary, and maintain in corporate procedures, the exit conditions for departure from the exemption consistent with the conditions specified in the exemption request. (CM.CC.2011-842)</p> <p>The submittal stated these are programmatic commitments (i.e., not one-time actions).</p>	<p>LR-N12-0173, dated June 4, 2012, the licensee did not properly annotate the reference section by listing the commitments in accordance with PSEG's commitment management program procedures.</p> <p>Also, although the licensee revised procedure SY-AA-101-109-1003 to incorporate commitments made in PSEG letters LR-N11-0308 dated November 30, 2011, and LR-N12-0173 date June 4, 2012, the licensee did not properly annotate the reference section with the applicable step in accordance with PSEG's commitment management program procedures.</p> <p>Annotation of programmatic commitments is necessary to help preclude deletion or changes to commitments without the necessary changes.</p> <p>Discussion:</p> <p>Commitments CM.CC.2011-841, CM.CC.2011-842, and CM.CC.2012-849 (CM.CC.2012-849 revised commitment CM.CC.2011-840) are incorporated into procedure OP-AA-108-111-1001, Rev 12, "Severe Weather and Natural Disaster Guidelines." Although this procedure was revised to incorporate the commitments, it did not properly annotate the commitments in the reference section.</p> <p>Commitments CM.CC.2011-841, CM.CC.2011-842, and CM.CC.2012-849 are also incorporated into procedure SY-AA-101-109-1003, Rev 5, "Security During Hazardous Exterior Conditions." Although</p>
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			<p>this procedure was revised to incorporate the commitments, it did not properly annotate the commitments in the reference section.</p> <p>PSEG procedure LS-AA-110 requires programmatic commitments (e.g., ongoing commitments) be annotated in the associated implementing documents. PSEG procedure AD-AA-101-1002, Section 4.9.9.4, requires commitments to be listed and annotated in the reference section of procedures. Section 4.9.9.A of procedure AD-AA-101-1002 requires that the applicable step where the commitment is addressed be included in the reference section.</p> <p>Since these commitments were programmatic commitments, procedure OP-AA-108-111-1001 should have the commitments listed in the reference section.</p> <p>PSEG has entered this into its correction action program (Notification 20694080).</p> <p>In addition, procedure SY-AA-101-109-1003 should have been annotated to indicate where the commitments are addressed within the procedure.</p> <p>PSEG has entered this into its correction action program (Notification 20694084).</p>
3	<p>Letter LR-N12-0173 for Hope Creek and Salem , Unit Nos. 1 and 2 dated 6/04/12 (ML12157A061) -----</p>	<p>The submittal made one commitment as follows:</p> <p>Incorporate as necessary, and maintain in corporate procedures, the requirement to establish consistent crew shift start times as described in PSEG response to RAI-03 .</p>	<p>See item No. 2 above.</p>

	<p>Exemption dated 10/26/2012 (ML12299A081)</p>	<p>(CM.CC.2012-849)</p> <p>The submittal revised one commitment from letter LR-N11-0308 as follows:</p> <p>Incorporate as necessary, and maintain in corporate procedures, the entry conditions necessary to sequester site personnel that are consistent with the conditions specified in the response to RAI-02. (CM.CC.2011-840)</p> <p>The submittal stated these are programmatic commitments (i.e., not one-time actions).</p>	
<p>4</p>	<p>Letter LR-N12-0108 for Salem 1 dated 05/08/12 (ML12130A169)</p> <p>-----</p> <p>Salem 1 Amendment No. 303 dated 03/28/13 (ML13072A105)</p>	<p>The submittal made two commitments as follows:</p> <p>1. For the condition monitoring (CM) assessment, the component of leakage from the prior cycle from below the H* distance will be multiplied by a factor of 2.16 and added to the total leakage from any other source and compared to the allowable accident induced leakage limit. For the operational assessment (OA), the difference in the leakage between the allowable leakage and the accident induced leakage from sources other than the tubesheet expansion region will be divided by 2.16 and compared to the observed leakage. An administrative limit will be established to not exceed the calculated value. (CM.U1.2012-856)</p> <p>2. PSEG will monitor for tube slippage as part of the steam generator tube inspection program. The results of this monitoring will be included in the report required by TS 6.9.1.10j.</p>	<p>Observation:</p> <p>None</p> <p>Discussion:</p> <p>Both of these commitments are incorporated into procedure S1.SG-ST.RCE-0001(Q), Rev 9, "Steam Generator Eddy Current Examination Activities." PSEG procedure S1.SG-ST.RCE-0001(Q) is an implementing procedure. Procedure AD-AA-101-1002, Section 1.2, states that "[s]tation implementing procedures are not required to adhere to this Standard format. AD-AA-101-1003, Implementing Procedures Writer's Guide, applies to existing station-specific implanting procedures." Procedure AD-AA-101-1002 has different commitment annotation requirements than procedure AD-AA-101-1003.</p>

		(CM.U1.2012-857) The submittal stated these are programmatic commitments (i.e., not one-time actions).	PSEG has entered these differences into its corrective action program (Notifications 20694048 and 20694050).
5	Letter LR-N11-0159 for Hope Creek and Salem, Unit Nos. 1 and 2 dated 06/06/2011 (ML111791803) ----- Hope Creek Amendment No. 189, Salem, Unit No. 1, Amendment No. 300, and Salem, Unit No. 2, Amendment No. 283 dated 7/28/2011 (ML111861560)	Implementation Milestones 1-7 are captured under Commitment Number 858 in the Hope Creek and Salem tracking system. Details are not included here due to the information being marked "Security Related Information – Withhold Under 10 CFR 2.390." (CM.CC.2012-858)	Observation: None Discussion: Based on discussions with PSEG staff, in addition to tracking these milestones as commitments, PSEG has orders associated with the Milestones. PSEG is tracking the milestones as commitments because of industry guidance but understands that the NRC staff does not consider the milestones to be commitments.
6	Letter LR-N13-0265 for Hope Creek and Salem, Units Nos. 1 and 2 dated 12/24/13 (ML14016A179) ----- Hope Creek Amendment No. 197, Salem, Unit No. 1, Amendment No. 306, and Salem, Unit No. 2, Amendment No. 288 dated 12/23/14 (ML14323A974)	The submittal made one commitment as follows: PSEG will implement the revised Milestone 8 schedule as defined in Attachment 3 of this submittal. (CM.CC.2013-876) The submittal stated that the commitment would be completed June 30, 2017.	See item No. 5 above.

Summary of Audit Results
Audit of Management of Licensee's Commitment Management Program
Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2
Docket Nos. 50-354, 50-272 and 50-311

TABLE 2

Item No.	PSEG Tracking No.	Description of Commitment Change	Audit Results - Verification of Licensee's Program for Managing Commitment Changes
1	CM-SC-1992-336	<p>In Attachment 1 (page 8) of PSEG letter LR-N96154 (LAR) dated 06/10/96, the licensee stated that "Operation in the recirculation mode will also be required for short durations during delivery of Ammonium Hydroxide in accordance with the current commitments relative to Regulatory Guide 1.78."</p> <p>The commitments referred to are in response to an NRC NOV inspection reports 272/92-07 and 311/92-07. PSEG responded by letter NLR-N92100 dated 08/10/1992. The corrective actions state, in part, "the short term corrective actions immediately implemented, that are currently in place, are the administrative controls for tanker truck deliveries and use of 15 wt% concentration ammonium hydroxide.."</p> <p>As described in PSEG letter LR-N13-0088 dated 12/13/2013, PSEG deleted the Original Commitment, which was worded,</p> <p>"Operation in the recirculation mode of Control Area ventilation (CAV) will be required for short durations during delivery of Ammonium Hydroxide in accordance with the commitments relative to Regulatory Guide 1.78 Revision 1."</p>	<p>Observation:</p> <p>None</p> <p>Discussion:</p> <p>Order 70105367 dated June 1, 2010, was used to track deletion of the commitment and the 50.59 changes to update the technical specification (TS) bases and update the updated final safety analysis report (UFSAR) with the removal of the requirement.</p> <p>Design Changes 80070384 and 8007261 implemented the use of 350 gallon totes of ammonium hydroxide to lower the risk of spills and personnel injury during filling. A new analysis was completed and concluded that the worst case scenario caused a control room concentration of ammonium hydroxide below the Regulatory Guide 1.78, Revision 1, limit.</p> <p>In addition, Salem, Unit Nos. 1 and 2, TS bases Section 3/4.7.6 and UFSAR Section 2.2.3.3 and Appendix 3A were updated to reflect this change.</p>

Item No.	PSEG Tracking No.	Description of Commitment Change	Audit Results - Verification of Licensee's Program for Managing Commitment Changes
2	CM-SC-1981-28	<p>As shown in Section 8.3.4 of NUREG-0517, Supplement 5, dated January 1981 (Salem Unit 2 Safety Evaluation Report (SER)), as part of the original operating licensing for Salem Unit 2, the NRC required that "a complete formal training program be implemented for all the mechanical and electrical maintenance, quality control, and operating personnel, including supervisors, who will be responsible for the maintenance and availability of the diesel generators. The depth and quality of this training program shall be at least equivalent to that of training programs normally conducted by major diesel engine manufacturers."</p> <p>This commitment had been previously changed as indicated in PSEG letter LR-N09-0103 dated 5/5/09.</p> <p>As described in PSEG letter LR-N14-01249 dated 12/22/14, PSEG stated that:</p> <p>"PSEG provided an "initial" complete formal training and a qualification program for Emergency Diesel Generator (EDG) maintenance for applicable personnel who work on and supervise EDG maintenance activities.</p> <p>Continuing (future) training will be decided using the systems approach to training IAW [in accordance with] 10CFR50.120 and the training process description. Continuing (future) training for quality control will be determined by management personnel responsible for the quality control function and implemented through a procedurally controlled process."</p>	<p>Observation:</p> <p>None</p> <p>Discussion:</p> <p>The Commitment Change Evaluation Form was completed in accordance with procedure LS-AA-110-1001 on 1/23/13. The Implementing Procedure NO-AA-101-1004, Rev 12, "QV [Quality Verification] Inspector Qualification and Certification," was verified to be updated. The procedure contained the commitment change and was annotated in accordance with procedure AD-AA-101-1002.</p>

Item No.	PSEG Tracking No.	Description of Commitment Change	Audit Results - Verification of Licensee's Program for Managing Commitment Changes
3	CM-SC-1992-355	<p>As described in PSEG letters dated 01/31/92 and 08/14/92 the licensee committed to procedural controls on the 115-volt D vital instrumentation bus (VIB) and inverter in the form of TS Interpretation (TSI), in lieu of incorporating these actions in the facility TSs in response to Generic letter 91-11. The TSI was to remain in effect until extension of the allowed outage time or deletion of the TSI was justified.</p> <p>On April 30, 1999, the NRC issued license amendments 221 and 203, for Salem Units 1 and 2 respectively, which revised TS 3/4.8.2.1, "AC Distribution -Operating," to add operability conditions and associated action statements for the 115-volt VIB D and inverter. The amendments completed the recommended action from NRC Generic Letter 91-11, Resolution of Generic Issues 48, "LCOs for Class 1 E Vital Instrument Buses," and 49, "Interlocks and LCOs for Class 1E Tie Breakers," and eliminated the need for the TSI.</p> <p>Letter LR-N13-0088 dated 12/13/2013 informed the NRC the commitment was completed with the approval of license amendments 221 and 203.</p>	<p>Observation:</p> <p>None</p> <p>Discussion:</p> <p>The Commitment Change Evaluation Form was completed in accordance with LS-AA-110-1001 on 8/6/12. One error in step 4 was found. Step four asks, in part, if the original commitment was made in response to a NRC generic Letter. The question is incorrectly answered as a No. However, the reviewer completed the next section, Question 5, as if the answer had been Yes. The reviewer also completed question 6, which would have been unnecessary if the question was answered correctly. As a result the form leads to two different actions. The correct action to document the conclusion and report it to the NRC and the incorrect conclusion to document conclusion and no NRC notification required. The correct action was taken as evidence by letter LR-N13-0088.</p> <p>The Implementing Procedure for D Vital Instrumentation BUS UPS System Operation for Salem Unit 1 and 2, S1.OP-SO.115-0014(Q), Rev 12, "1D Vital Instrumentation Bus UPS System Operation," was verified to be updated. The procedure no longer contained the commitment.</p>

Item No.	PSEG Tracking No.	Description of Commitment Change	Audit Results - Verification of Licensee's Program for Managing Commitment Changes
4	CM-U2-1995-008	<p>In response to NRC notice of violation, Inspection Report Nos. 50-272/311/94-32, 50-272/311/95-02, 50-272/311/95-07, and 50-272/311/95-10, PSEG committed in letter LR-N95196 dated 11/15/1995 to implement a 54-month preventive maintenance (PM) requirement to open and inspect the Reactor Head vent valves internals and repair as needed at Salem 1 and 2.</p> <p>As described in PSEG Letter LR-N14-0249 dated 12/22/2014, PSEG deleted the original commitment, which was worded:</p> <p>"New PM Recurring Tasks (RT's) have been initiated to implement a 54 month PM to open and inspect Reactor head vent valve internals and to repair as needed. A New Maintenance Department procedure has been issued to provide guidance on the disassembly, inspection, and refurbishment of the Reactor head vent valves. These corrective actions will be completed prior to restart of the affected unit"</p>	<p>Observation:</p> <p>None</p> <p>Discussion:</p> <p>The Commitment Change Evaluation Form was completed in accordance with LS-AA-110-1001 on 05/06/2013. Procedure SC.MD-PM.ZZ-0166(Q), Rev. 1, "Disassembly, Inspection, and Repair of Target Rock Solenoid Valve Mark #FA-140," and Vendor Documentation Checklist (VDC) 301614, Rev 5, "Technical Manual Solenoid Operated Valves," were verified to not include reference to the commitment.</p>

R. Braun

If you have any questions, please contact me at (301) 415-1603 or Carleen.Parker@nrc.gov.

Sincerely,

/RA/

Carleen J. Parker, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-354, 50-272, and 50-311

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RidsNrrLALRonewiczResource

RidsRgn1MailCenter Resource

TOrf, NRR

R1HopeCreek Resource

LPL1-2 R/F

RidsNrrDorlLpl1-2 Resource

RidsNrrPMSalem Resource

RidsNrrPMHopeCreek Resource

GDental, RGN-I

R1Salem Resource

ADAMS Accession No.: ML15237A378

OFFICE	NRR/DORL/LPL1-2/PM	NRR/DORL/LPL1-2/LA	NRR/DORL/LPL1-2/BC	NRR/DORL/LPL1-2/PM
NAME	CParker	LRonewicz	DBroaddus	CParker
DATE	8/26/15	8/27/15	12/11/15	12/14/15

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