



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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December 23, 2015

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SUBJECT WATTS BAR NUCLEAR PLANT, UNITS 1 AND 2 – AUDIT OF THE
 LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS
 (CAC NOS. MF6745 AND MF6746)

Dear Mr. Skaggs and Mr. Shea:

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 encouraged licensees to use the NEI guidance or similar administrative controls to ensure that regulatory commitments are implemented and that changes to the regulatory commitments are evaluated and, when appropriate, reported to the NRC.

The NRC Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that regulatory commitments are being effectively implemented.

- 2 -

An audit of Watts Bar Nuclear Plant's (WBN's) commitment management program was performed at the WBN site during the period November 17 - 20, 2015. The NRC staff concludes, based on the audit, that (1) WBN has implemented NRC commitments on a timely basis, and (2) has implemented a generally effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

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

Robert G. Schaaf, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-390 and 50-391

Enclosure: Audit Report

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS

WATTS BAR NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-390 AND 50-391

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 defines a "regulatory commitment" as an explicit statement to take a specific action agreed to, or volunteered by, a licensee and submitted in writing on the docket to the NRC.

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 Watts Bar Nuclear Plant (WBN) commitment management program was performed at the WBN site during the period November 17 – 20, 2015. The audit reviewed commitments made since the previous audit on November 9, 2012.

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.).

2.0 AUDIT PROCEDURE AND RESULTS

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

2.1 Verification of Licensee's Implementation of NRC 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

Enclosure

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 Agencywide Document Access and Management System 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, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

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

The NRC staff sampled 37 commitments between the two units and all sampled commitments were identified in the licensee's commitment tracking system.

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. Since the previous audit conducted in November 2012, the procedure used at WBN, Unit 1, Nuclear Power Group Standard Programs and Processes (NPG-SPP) 3.3 "NRC Commitment Management," underwent a major revision in August 2015. As part of this audit, the NRC staff reviewed the differences between the old and new revisions

to the procedure. The audit also reviewed the regulatory commitment program procedure for WBN, Unit 2, New Construction Project Procedure 19 (NC PP-19), "Closure of Commitments/Open Items Required for Licensing." The audit also 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. In addition, the NRC staff reviewed the self-assessments (Numbers CRP-LIC-S-13-002, CRP-LIC-S-14-002, and CRP-LIC-SSA-15-005) of the implementation effectiveness of NPG-SPP 3.3 by Tennessee Valley Authority (TVA) Nuclear Power Group (Corporate) Licensing in October 2013, December 2013, and October 2015.

2.2.1 Audit Results

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

The NRC staff found one example where TVA had closed a regulatory commitment without proper closure justification and without completing the commitment as stated in correspondence to the NRC (commitment Number NCO081008001). When informed, TVA staff entered a condition report (CR) 1105787 to determine whether the commitment should be reopened. The NRC staff has no further questions regarding this item. Additionally, the NRC staff observed minor administrative errors in the commitment tracking database (CTD), such as missing data fields required to be filled by NPG-SPP 3.3, minor discrepancies in closure documentation (e.g., an erroneous closure date), and some instances where the commitment wording in the CTD did not match the docketed regulatory commitment.

The NRC staff found that the new revision of NPG-SPP 3.3 (Revision 6) is consistent with the guidance contained in NEI 99-04. Regarding NC PP-19, the NRC staff found that the procedure for processing regulatory commitments at WBN, Unit 2, is not consistent with the guidance in NEI 99-04, in that it lacked a codified commitment change evaluation process. When informed, TVA staff stated that all commitment changes for WBN, Unit 2, were communicated in writing to the NRC; however, this process was not included in the NC PP-19 procedure. The NRC staff notes that since the August 2015 revision of NPG-SPP 3.3, the WBN, Unit 2, licensing staff has been following NPG-SPP 3.3 for Unit 2 commitments, including the commitment change evaluation process (except for commitment closure, which is still under NC PP-19). The licensee entered a CR for this issue (CR 1105976). The NRC staff notified the WBN, Unit 2, resident inspectors of this discrepancy, and will follow up with the licensee on corrective actions to ensure any open Unit 2 commitments were changed appropriately while under the NC PP-19 procedure. The NRC staff concludes that the approach of communicating all WBN, Unit 2, commitment revisions in writing to the NRC is conservative in relation to the NEI 99-04 guidance and is, therefore, acceptable.

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. None of the commitments selected for the audit sample were determined to be misapplied.

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, exemption and relief request safety evaluations that have been issued for WBN since the last audit were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above. The evaluation concluded that none of these documents contained any misapplied commitments.

3.0 CONCLUSION

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

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Beverly Duckett – Watts Bar Licensing
Jim O'Dell – Watts Bar Licensing
Timothy Page – TVA Corporate Licensing
Thomas Elton – Watts Bar Licensing
Russell Stroud – Watts Bar Licensing

Principal Contributors: Jennifer Hauser
Andrea George

Date: December 23, 2015

Attachment: Summary of Audit Results

AUDIT SUMMARY

IMPLEMENTATION OF COMMITMENTS:

The following commitment samples were reviewed:

Description	Commitment Tracking No.	ADAMS Reference	Comments
Unit 1			
By March 31, 2013, TVA will install a permanent plant modification to provide flood protection with respect to the Design Basis Flood level for the WBN, Unit 1 Thermal Barrier Booster pumps and motors.	113637263	ML12171A053	This commitment was closed after flood barriers were installed by commitment due date of 3/31/13.
Revise Radiological Emergency Plan (REP) PAR Flowcharts and alternate facility descriptions NP-REP will be revised to replace both pages of Figure 10-1 to update the PAR Flowcharts for NUREG 0654, Supplement 3 guidance. In addition, the NP-REP will be revised to include descriptions of the alternate facilities.	116118710	ML15205A124 ML15205A110	This commitment was closed upon submittal of updated REP to NRC on 9/12/14.
Update Updated Final Safety Analysis Report (UFSAR) for Generic Letter (GL) 1988-17. Each WBN unit will update its respective Safety Analysis Report (i.e., UFSAR for Unit 1 and Final Safety Analysis Report (FSAR) for Unit 2) to reflect this different means of providing two different monitoring systems.	114978890	ML13228A264	This commitment was closed after the Unit 2 FSAR was updated to reflect the Unit 1 wording regarding two different monitoring systems (Unit 1 FSAR was already worded correctly).
TVA will revise the UFSAR to include the following, as part of the adoption of TSTF-500, Rev 2. As identified in License Amendment Request (LAR) WBN-TS-12-07.	115086708	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
Within 6 months of NRC approval, TVA will evaluate adopting the revised ISTS-523, Surveillance Requirement (SR) 3.5.2.3 at WBN within 6 months of NRC approval of the traveler.	NCO081008001	ML082890540	This commitment was closed with insufficient justification and without completing the commitment as stated in correspondence to NRC (licensee Condition Report 1105787). The commitment change evaluation

			process was applied appropriately for changes to this commitment.
Monitoring of battery parameters (i.e., specific gravity, electrolyte level, cell temperature, float voltage, connection resistance, and physical condition) will be relocated to the licensee-controlled program as required and described in Technical Specifications (TS) Section 5.7.2.21, "Programs and Manuals," and titled the "Battery Monitoring and Maintenance Program."	115086759	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
TVA verifies that the equipment that will be used to monitor float current under SR 3.8.6.1 and SR 3.8.6.2 will have the necessary accuracy and capability to measure electrical currents in the expected range. Additionally, TVA verifies that the minimum required procedural time to measure battery float current will be 30 seconds or as recommended by the float current measurement instrument manufacturer. This minimum float current measurement time is required to provide a more accurate battery float current reading.	115086730	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
TVA verifies that the modified performance discharge test for each diesel generator (DG) battery completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the DG battery capacity to supply the design basis load profile.	115086798	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
The cell resistance limits in existing SR 3.8.4.5 will be relocated to the Battery Monitoring and Maintenance Program.	115086683	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
TVA verifies that plant procedures will require verification of the selection of the pilot cell or cells when performing SR 3.8.6.5. Note: The current methodology selects a "representative" cell annually that has average voltage and specific gravity. The new	115086780	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.

methodology selects the lowest voltage cell in each battery.			
TVA verifies that battery room temperature is routinely monitored such that a room temperature excursion could reasonably expect to be detected and corrected prior to the average battery electrolyte temperature dropping below the minimum electrolyte temperature. Battery Room Temperature will be monitored at least every 12 hours during operator tours.	115086745	ML13248A250 ML14178B301	This commitment was closed due to LAR being withdrawn on 6/20/14. The commitment change evaluation process was applied appropriately.
TVA will install flood mode hardened 3.0 megawatt electric (MWe) Diesels (one per operating unit) designed to provide extended coping in accordance with NEI 12-06 guidance as described for Milestone 2 in the Table in Enclosure 1 of the commitment letter by August 2014.	114618505	ML13108A107 ML14275A239	This commitment was closed upon installation of two 225 kilo-volt-ampere (kVA) DGs per NRC Order EA-12-049 requirements. The commitment change evaluation process was applied appropriately to change the DG specifications.
TVA will install a hardened enhanced flood mode system for decay heat removal as described for Milestone 3 in the Table in Enclosure 1 of the commitment letter by December 2016.	114620087	ML13108A107 ML14275A239	This is an open commitment. The commitment change evaluation process was applied appropriately to change the responsible supervisor and the completion date.
TVA will include a procedural action to place an Auxiliary Feedwater pump in pull-to-lock prior to starting a second emergency raw cooling water pump on a shutdown board when the shutdown board is powered by the diesel generators.	117034467	ML15215A649	This commitment is open. The text in the CTD does not match the regulatory commitment made in the correspondence to the NRC, which was corrected by the licensee.
TVA will construct a flood mode hardened structure that will meet or exceed NEI 12-06 as described for Milestone 1 in the Table in Enclosure 1 of the commitment letter by November 2015.	114617987	ML13108A107 ML14275A239	This is an open commitment. The commitment change evaluation process was applied appropriately to change the responsible supervisor, the completion date, and the location of enhanced flood mode equipment.

Description	Commitment Tracking No.	ADAMS Reference	Comments
Unit 2			
WBN Unit 2 will include backup generator procedure(s) to include supplying one train of containment hydrogen igniters per unit and train personnel to the procedure.	113654301	ML110890562	This commitment was closed after operator training was completed (3-OT-B5b) and revised procedures were issued.
The Regulatory Framework status for Supplemental Safety Evaluation Report (SSER) Appendix HH shown in Reference 1 will be revised to reflect the anchor bolt verification methodology described in this letter in the next update.	114351907	ML13030A031 ML13088A066	This commitment was closed due to an NRC inspection report closing out Open Item 50, and the justification that a change to the regulatory framework was not required due to the Open Item not being tied to any portion of the SSER for the operating license for Unit 2.
The information provided in Enclosure 4 will be incorporated into the WBN Unit 2 FSAR by Amendment 110.	114957518	ML13225A021 ML13255A164	This commitment was closed after submitting FSAR Amendment 110 to the NRC. The NRC staff verified that the FSAR changes pertinent to this commitment remained in the most recent FSAR update (Amendment 114).
The TVA WBN Unit 2, NPG System Description Document, NPG-SDD-WBN2-82-4002, "Standby Diesel Generator System" shall be revised to describe the DG frequency and voltage governor setting methodology.	115514895	ML14038A079	This commitment was closed after the appropriate NPG system description document was updated.
TVA will add the License Condition to WBN Unit 2 FSAR Section "8.2.2 Analysis" as part of WBN Unit 2 FSAR Amendment 113. WBN Unit 2 FSAR Amendment 113 will be issued on or before October 30, 2014.	116123812	ML14247A231 ML15076A388	This commitment was closed due to submittal of the specified updates to the NRC in Amendment 113 of the FSAR.

The Watts Bar Nuclear Plant Unit 2 TSs will be updated by January 30, 2015, to reflect the higher ice mass described in Enclosure 2 of this letter.	116439570	ML14352A248 ML15187A461	This commitment was closed based on submittal of the required updates to the TSs and TS bases to the NRC.
The long term containment pressure analysis will be included in WBN Unit 2 FSAR Amendment 114.	117060676	ML15225A382 ML15279A332	This commitment was closed due to the required information being included in the Unit 2 FSAR Amendment 114, which was submitted to the NRC by letter dated 9/11/15.
Revised ice weights for the ice bed and ice baskets will be incorporated in SR 3.6.11.2 and SR 3.6.11.3, respectively, in WBN Unit 2 TS Revision 0.	117060649	ML15225A382 ML15267A183	This commitment was closed due to the updated TSs being submitted to the NRC by letter dated 9/23/15.
The caution statement, "CAUTION: Both Units shall not be placed in Hot Shutdown simultaneously," will be added to the Watts Bar Nuclear Plant (WBN) System Description Document WBN-SSD-N3-70-4002, "Component Cooling System," prior to initial Mode 4 entry of WBN Unit 2.	117199011	ML15265A100	This commitment is open.
The caution statement, "CAUTION: Both Units shall not be placed in Hot Shutdown simultaneously," will be added to the WBN General Operating Instructions 1-G0-6 and 2-G0-6, "Unit Shutdown from Hot Standby to Cold Shutdown," prior to initial Mode 4 entry of WBN Unit 2.	117198968	ML15265A100	This commitment is open.
Prior to fuel load, it will be confirmed that the Unit 2 Probabilistic Risk Assessment model matches the as-built, as-operated plant.	111029124	ML100491535 ML14177A724	This commitment was closed due to the submission of the required PRA calculations to the NRC by letter dated 6/25/14.
WBN is interested in the new seal package technology being demonstrated by Westinghouse at the Farley Nuclear Plant (Severe Accident Management Alternative (SAMA) 58). However, prudence dictates that additional operation experience is needed prior to our implementation of SAMA 58. Therefore, WBN commits to follow the progress and experience with	111891340	ML11145A088 ML15103A209	This commitment was closed due to the analysis being submitted to the NRC by letter dated 4/10/15.

<p>this seal package design and if proven reliable during operation, it would be installed at the earliest refueling outage following startup during normal seal package replacements.</p>			
<p>In addition to the previous commitment, TVA WBN Unit 2 will ensure that the guidance added to the Unit 1 procedure as a result of the review of NRC GL 98-02 is incorporated into the Unit 2 procedures. Specifically, when decreasing power, valve HCV-74-34, Refueling Water Return (normally locked closed valve) has a hold order placed with specific release criteria before entry into Mode 4 and to remove the hold order before entry into Mode 3 when returning to power.</p>	<p>111377435</p>	<p>ML100950044</p>	<p>This commitment was closed due to procedure updates with the steps to positively control HCV-74-34 during startup and shutdown (procedures 2-GO-6, "Unit Shutdown from Hot Standby to Cold Shutdown," and 2-GO-1, "Unit Startup from Cold Shutdown to Hot Standby").</p>
<p>Procedural controls will be put in place at WBN Unit 2 to ensure that potential quantities of post-accident debris are maintained within the bounds of the analyses and design bases that support emergency core cooling system (ECCS) and containment spray system recirculation functions.</p>	<p>112044502</p>	<p>ML110680248 ML110430002 ML14163A658</p>	<p>This commitment was closed due to the appropriate procedures being modified.</p>
<p>Operating procedures are being revised to improve instructions for filling and venting portions of the ECCS discharge pipe (90 days prior to fuel load).</p>	<p>112054449</p>	<p>ML112232205 ML110750022</p>	<p>This commitment was closed after updating the ECCS operating instruction appropriately. This item was also covered in an NRC inspection report.</p>
<p>Periodic venting procedures used to meet SR 3.5.2.3 are being revised to require that, for an extended gas release, a report is entered into the Corrective Action Program (90 days prior to fuel load).</p>	<p>112054461</p>	<p>ML112232205 ML110750022</p>	<p>This commitment was closed after updating the ECCS operating instruction appropriately. This item was also covered in an NRC inspection report.</p>
<p>As resolution of this request for additional information, TVA commits to completing prior to Unit 2 fuel load the modifications and document revisions required to resolve the common multiple spurious operations (MSOs) identified in Appendix C submitted in TVA letter to NRC dated August 20, 2010.</p>	<p>112345687</p>	<p>ML102360283 ML13044A113</p>	<p>This commitment was closed after completing modifications required and closing out MSOs in Revision 2 of the MSO Evaluation Report R1976-20-01 dated January 2013.</p>

<p>"Charging Pump Runout" shall be confirmed to be within the bounds of centrifugal charging pump operation during the large break loss-of-coolant accident analysis prior to Unit 2 fuel load.</p>	<p>111905994</p>	<p>ML102360283 ML13044A113</p>	<p>This commitment was closed due to updating the MSO Evaluation described above and the Appendix R fire hazard analysis and safe shutdown analysis.</p>
<p>Incorporate a temperature limitation during heatup and cooldown operations into Unit 2 procedures.</p>	<p>NCO920071003</p>	<p>ML080320443 ML13023A315</p>	<p>This commitment remains open, but the licensee has documented partial closure due to issuance of two of three required procedures to comply with the commitment.</p>
<p>Have safety parameter display system operational prior to start-up after the first refueling outage.</p>	<p>NCO830138002</p>	<p>ML080320443</p>	<p>This commitment was closed after completion of testing per integrated computer system operability test plan.</p>
<p>Implement Maintenance Rule for Unit 2 systems by June 20, 2014.</p>	<p>NCO080008068</p>	<p>ML080320443 ML103210644 ML11292A199 ML12284A514</p>	<p>This commitment was closed after implementing two unit procedures: NPG-SPP-03.4, "Maintenance Rule Performance Indicator Monitoring, Trending and Reporting – 10 CFR [Code of Federal Regulations] 50.65," Revision 2, and Technical Instruction 0-TI-119, "Maintenance Rule Performance Indicator Monitoring, Trending and Reporting – 10 CFR 50.65," Revision 0. This commitment was revised four times with each change communicated to the NRC in writing.</p>
<p>TVA will install flood barrier modifications to prevent water damage to WBN Unit 2 Component Cooling System Thermal Barrier Booster Pumps in the event of a Probable Maximum Flood before WBN Unit 2 receives an operating license.</p>	<p>NCO080008054</p>	<p>ML080320443 ML14085A009</p>	<p>This commitment was closed after installing the required flood barriers (verified by NRC inspection), and closeout of the open item in NRC SSER 27, Section 9.2.2.</p>

An audit of Watts Bar Nuclear Plant's (WBN's) commitment management program was performed at the WBN site during the period November 17 - 20, 2015. The NRC staff concludes, based on the audit, that (1) WBN has implemented NRC commitments on a timely basis, and (2) has implemented a generally effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

/RA/

Robert G. Schaaf, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-390 and 50-391

Enclosure: Audit Report

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