



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

October 16, 2017

EA-13-188

Mr. Daniel G. Stoddard  
President and Chief Nuclear Officer  
Dominion Resources  
5000 Dominion Boulevard  
Glen Allen, VA 23060-6711

SUBJECT: CONFIRMATION OF COMPLETION OF ACTIONS TAKEN BY DOMINION  
NUCLEAR CONNECTICUT, INC., AS SET FORTH IN NRC CONFIRMATORY  
ORDER DATED AUGUST 26, 2015

Dear Mr. Stoddard:

This letter acknowledges the actions taken by Dominion Nuclear Connecticut, Inc. (DNC) in response to Confirmatory Order EA-13-188 (Order) (ADAMS Accession No. ML15236A207) issued August 26, 2015, by the U.S. Nuclear Regulatory Commission (NRC). The actions were taken to fulfill commitments made as part of a settlement agreement reached during a July 14, 2015, Alternative Dispute Resolution (ADR) mediation session and two follow-up teleconferences on July 16, 2015, and July 24, 2015, between DNC and the NRC. DNC requested the ADR mediation session in response to a letter the NRC issued April 29, 2015, (ML15119A028), which enclosed a summary of an investigation conducted by the NRC Office of Investigations (OI) at the Millstone Power Station (Millstone). The NRC letter described three apparent violations (AVs), two of which were being considered for escalated enforcement action, identified during the investigation. The letter also included the offer for ADR.

The first AV involved changes made by DNC to Section 14.6.1 of the Millstone Unit 2 Updated Final Safety Analysis Report (UFSAR) that removed credit for the Chemical and Volume Control System (CVCS) charging pump flow in the mitigation of the design basis accident involving the inadvertent opening of pressurizer power operated relief valves, without obtaining prior NRC approval. The second AV involved the failure by DNC to provide complete and accurate information to the NRC in reports and other documents pertaining to the aforementioned UFSAR change, including a failure to notify the Commission of information having significant implications for public health and safety. The third AV involved changes made by DNC to Chapter 9 of the Millstone Unit 2 UFSAR and Section 3/4.9.3 of the Technical Specification (TS) Bases that decreased the required amount of irradiated fuel decay time from 150 to 100 hours prior to fuel movement in the reactor vessel, without obtaining prior NRC approval. As part of the settlement agreement, DNC agreed to take a number of actions, which were subsequently documented in the August 26, 2015, Order. The actions, in part, included: (1) reinstating site requirements and processes pertaining to the CVCS and fuel decay issues to what had been in place prior to the changes implemented by the site; (2) submitting formal license amendment requests to obtain NRC approval for the CVCS and fuel decay changes; (3) conducting formal reviews of Millstone's process for evaluating changes, tests, and experiments in accordance

with Title 10 of the *Code of Federal Regulations*, Section 50.59; (4) issuing fleet-wide communications and providing training to reinforce the importance of providing complete and accurate information to the NRC; and (5) communicating with the nuclear industry about this issue.

The NRC has concluded that DNC satisfied all of the terms of the Order. Enclosed with this letter is a document listing: 1) the specific Order commitments and a brief description of the actions taken by the NRC to verify that each commitment has been satisfied. You are not required to submit any further correspondence to the NRC on this matter. If you have any questions or comments, please contact Jonathan Greives, Chief, Projects Branch 2, Division of Reactor Projects, Region I, at 610-337-5120.

A copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room located at NRC Headquarters in Rockville, MD, and from ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

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Christopher G. Miller, Director  
Division of Inspection and Regional support

Enclosure:  
Completion of Actions Set Forth in the  
NRC Confirmatory Order EA-13-188 dated  
August 26, 2015

SUBJECT: CONFIRMATION OF COMPLETION OF ACTIONS TAKEN BY ENTERGY NUCLEAR OPERATIONS, INC., AS SET FORTH IN NRC CONFIRMATORY ORDER DATED AUGUST 26, 2015: DATED OCTOBER 16, 2017

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\* See concurrence on previous page

\*\* Concurred via email

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NAME	JPeralta	MSimon (NLO)	CMiller			
DATE	9/18/17	9/20/17	10/16/17			

**OFFICIAL RECORD COPY**

Completion of Actions Set Forth in the NRC Confirmatory Order Dated August 26, 2015

**Commitment 1:**

Within sixty (60) calendar days of the date of the Confirmatory Order, Dominion Nuclear Connecticut, Inc. (DNC) will:

- a. Revise, as necessary, Standing Order 14-016 dated May 11, 2014, to incorporate applicable Millstone Power Station (Millstone) Unit 2 Technical Specifications (TSs); limiting conditions of operations (LCOs); actions; and surveillances that reflect the safety analysis of the inadvertent opening of the pressurizer power operated relief valves (PORVs) prior to implementation of Amendment No. 283. This revision of the standing order will be made available for NRC review prior to implementation.
- b. Complete an operability evaluation for the use of charging pumps in accordance with Standing Order 14-016, as revised by paragraph 1.a., associated with the inadvertent opening of PORVs and make the operability evaluation available to NRC for review; and
- c. Evaluate the effect of three pump charging pump operation (i.e., three charging pumps auto start and provide flow) with the current plant configuration. If the evaluation concludes no adverse effect, revised Standing Order 14-016 will be changed to require that three charging pumps auto start and provide flow. This evaluation will be made available for NRC review.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2015004 and 05000423/2015004 (ML16035A119), the NRC documented its review of the interim condition of the charging system to determine the acceptability of the existing plant configuration pending completion of the revised license amendment review. The inspectors reviewed the configuration as documented in the standing order and operability determination and determined this did not represent a degradation of the design bases, licensing bases, or performance capability of the affected systems.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 2:**

By no later than February 15, 2016, DNC will submit a license amendment request (LAR) to the NRC addressing the use of charging pumps in the analysis of the inadvertent opening of PORVs. If DNC does not submit an LAR by February 15, 2016, the Millstone Unit 2 design and licensing basis for the operation of charging pumps to mitigate the inadvertent opening of PORVs that was in place prior to Amendment No. 283 (dated September 9, 2004) will be reinstated by this Confirmatory Order, and DNC will take all actions necessary to conform Millstone Unit 2 to the reinstated design and licensing basis.

**Actions Taken and NRC Conclusion:**

On January 25, 2016, DNC submitted an LAR (ML16029A168) to the NRC addressing the use of charging pumps in the analysis of the inadvertent opening of PORVs.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 3:**

DNC's Standing Order 14-016 (Rev. 0, dated May 11, 2014), as revised in accordance with Commitment 1, will remain in place until the NRC makes a final determination on the LAR submitted under Commitment 2.

**Actions Taken and NRC Conclusion:**

On December 22, 2016, the NRC issued Amendment No. 331 and the accompanying Safety Evaluation to Millstone Unit No. 2 (ML16308A485). The amendment revises the Millstone Unit 2 TSs to remove the requirement for the charging pumps to be operable in TS 3.5.2, "Emergency Core Cooling Systems, ECCS Subsystems - Tavg ~ 300 °F," by eliminating surveillance requirement 4.5.2.e from the TSs. The proposed change also revises the Millstone Unit 2 final safety analysis report relative to the long-term analysis of the inadvertent opening of a PORV event and clarifies the existing discussion regarding the application of single failure criteria.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 4:**

If the NRC denies the LAR submitted under Commitment 2, or the licensee withdraws the LAR, the Millstone Unit 2 design and licensing basis for the operation of charging pumps to mitigate the inadvertent opening of PORVs that was in place prior to implementation of Amendment No. 283 (dated September 9, 2004) will be reinstated by this Confirmatory Order, and DNC will take all actions necessary to conform Millstone Unit 2 to the reinstated design and licensing basis.

**Actions Taken and NRC Conclusion:**

On December 22, 2016, the NRC issued Amendment No. 331 and the accompanying Safety Evaluation to Millstone Unit No. 2 (ML16308A485). See Actions Taken and NRC Conclusions for Commitment 3 above.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 5:**

By no later than February 15, 2016, DNC will submit an LAR seeking NRC approval of the spent fuel pool (SFP) heat load analysis and any associated TSs changes. This will be treated as a high priority review by the NRC.

**Actions Taken and NRC Conclusion:**

On January 26, 2016, DNC submitted an LAR (ML16034A358) seeking NRC approval of the SFP heat load analysis and any associated TSs changes.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 6:**

DNC's Standing Order 14-021 (Rev. 0 dated July 9, 2014) will remain in place until the NRC makes a final determination on the LAR submitted under Commitment 5.

**Actions Taken and NRC Conclusion:**

On November 29, 2016, the NRC issued Amendment No. 330 and the accompanying Safety Evaluation to Millstone Unit No. 2 (ML16277A680). The amendment revises the Millstone Unit 2 licensing basis to change the SFP heat load analysis description contained in the Final Safety Analysis Report (FSAR). Specifically, the amendment revises Millstone Unit 2 FSAR Section 9.5 to allow irradiated fuel movement in the reactor vessel to begin 100 hours after reactor subcriticality at an average rate of six fuel assemblies per hour.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 7:**

If the NRC denies the LAR submitted under Commitment 5, or the licensee withdraws the LAR, TS 3/4.9.3.1 in the Millstone Unit 2 license will be revised by this Confirmatory Order to require 150 hours of decay time before moving irradiated fuel from the reactor to the SFP, and changes made by Licensing Basis Document Change Request 10-MP2-007 (dated June 22, 2010) to Chapter 9 of the Millstone Unit 2 UFSAR and to the TS Bases will be replaced by the prior content of those documents. DNC will take all actions necessary to conform Millstone Unit 2 to the requirements of the revised TS and UFSAR.

**Actions Taken and NRC Conclusion:**

On November 29, 2016, the NRC issued Amendment No. 330 and the accompanying Safety Evaluation to Millstone Unit No. 2 (ML16277A680). See Actions Taken and NRC Conclusion for Commitment 6 above.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 8:**

By no later than June 30, 2016, DNC will complete a self-assessment of its 10 CFR 50.59 program and procedures (including applicability, screening and evaluations) including a review of procedures, implementation, initial training, continuing training, and safety review committee activities. A majority of the self-assessment team will be comprised of a combination of non-DNC industry experts and peers. The assessment will also address the Millstone Nuclear Oversight organization's responsibilities and the effectiveness of the execution of those responsibilities regarding the 10 CFR 50.59 program.

- a. DNC shall make available to the NRC, upon request, the results of the assessment and any corrective actions DNC will take to address the results.
- b. DNC will complete corrective actions resulting from findings of the assessment consistent with the requirements of the Millstone Corrective Action Program (CAP).

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106),

the NRC documented its inspection of the DNC self-assessment. The 50.59 self-assessment team performed the assessment during the week of February 15, 2016, and completed the associated report (PIR No. 1020010) on April 14, 2016. The NRC noted that the majority of the self-assessment team (five of eight team members) were non-DNC industry experts and peers. The self-assessment team determined that DNC effectively implemented the 50.59 program at Millstone. However, the self-assessment team recommended a number of changes to improve the program and product quality and identified several organizational learning opportunities (enhancements). The NRC noted that DNC's self-assessment objectives aligned with the Confirmatory Order action item requirements and that Dominion developed a detailed scope to assess each objective. The NRC concluded that the self-assessment was appropriately focused, critical, thorough, and effective in identifying issues. The NRC also noted that DNC effectively used the CAP to identify, evaluate, and track the associated performance deficiencies and enhancements through resolution.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 9:**

DNC has conducted two apparent cause evaluations (ACEs) to address the issues included in this Confirmatory Order.

- a. The results of these evaluations will be made available to the NRC for review.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its review of the associated ACEs: ACE 19921, "Changes to U2 FSAR Section 14.6.1 and Failure to Provide Complete and Accurate Information to NRC;" and ACE 19923, "Failure to Obtain Approved License Amendment Prior to FSAR Change for Irradiated Fuel Decay Time."

For ACE 19921, DNC concluded that the apparent cause was inadequate verification of technical basis information contained in documents supporting regulatory submittals dated 2002 through 2007. In addition, DNC identified two contributing causes: (1) that awareness of 50.9(b) reporting requirements and guidance for evaluating 10 CFR 50.9(b) reportability were insufficient to support compliance; and (2) regulatory risk considerations, including external input, were not clearly appreciated and understood.

For ACE 19923, DNC concluded that the apparent cause was less than adequate rigor and challenge to a plan that resulted in not meeting regulatory requirements, even when prompted by the licensing and 50.59 screening process.

The inspectors determined that DNC's associated evaluations were sufficiently thorough, methodical, and based on the best available information, interviews, and relevant operating experience. DNC's assigned corrective actions were aligned with the identified causal factors, adequately tracked, appropriately documented, and completed as scheduled.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 10:**

By no later than March 1, 2016, DNC will complete a common cause evaluation of 10 CFR 50.59 issues that have been identified after July 1, 2012, with emphasis on any underlying

culture-related issues that specifically may exist in the Millstone Engineering and Licensing groups and the Facility Safety Review Committee. The team will include a member trained in cultural issues. Interviews of a sample of the staff members from the above groups will be included in the evaluation. In regard to this evaluation, DNC shall:

- a. Make the results of the evaluation available to the NRC;
- b. Communicate to Millstone employees the results of the evaluation within three months of receiving the evaluation results; and
- c. Review the results of the common cause evaluation and initiate corrective actions as appropriate within 30 days of receiving evaluation results.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its review of DNC's common cause evaluation of 10 CFR 50.59. In December 2015, a team composed of Fleet and Millstone personnel with one external peer conducted a common cause analysis ((CCA) 3009063) of 10 CFR 50.59 issues identified since July 2012. The team included one member trained on and experienced with cultural issues. The Millstone Corrective Action Review Board reviewed and approved the CCA results on February 8, 2016. The Millstone Safety and Licensing Director communicated the CCA results to 31 Millstone employees on March 30, 2016.

The CCA team identified the following common cause: engineering, nuclear licensing, and FSRC leadership were intermittently engaged with the 10 CFR 50.59 process during the trend period evaluated. The CCA team noted that leadership engagement improved after NRC inspectors identified issues early in the trend period; however, leadership did not sustain this improvement throughout the remainder of the trend period. The CCA team cited several examples where leadership engagement was lacking including insufficient monitoring of 10 CFR 50.59 products, insufficient response to adverse trends, and insufficient planning to ensure that an acceptable level of performance was sustained. The CCA team noted that the intermittent engagement manifested itself in several cultural areas, most notably weaknesses in personal accountability, continuous learning, and leadership behaviors. The CCA team observed that this was consistent with other important evaluations conducted by the station during the trend period. During interviews with CCA team members, DNC personnel stated that recent training initiatives were effective in improving personal accountability to the 10 CFR 50.59 process. The CCA team noted that recent performance had improved and reflected the increased emphasis that management had placed on the issue.

The CCA team identified that many corrective actions were initiated and/or in progress addressing the areas of personal accountability, continuous learning, and leadership. The CCA team did not repeat these actions as many were ongoing or pending an effectiveness review; however, the team did consider them in their overall analysis of the trend period. For example, the CCA team noted the following DNC ongoing actions: (1) revising the 10 CFR 50.59 continuing training plan (RCE 01123), (2) actions to improve engineering training review board performance (ACE 19903), and (3) Millstone Excellence Plan actions to improve leadership alignment and engineering accountability. In addition to these ongoing actions, the CCA team developed actions to improve long-term sustainability to guard against future leadership changes that may reduce oversight of 10 CFR 50.59 products and the underlying behaviors and designated the initiatives as corrective actions to prevent recurrence (CAPRs). These CAPRs included: (1) revising applicable Fleet procedures to require the designation of a 10 CFR 50.59 station process owner and subject matter expert; (2) revising applicable Fleet procedures to formalize feedback from the engineering Quality Review Team; (3) revising applicable Fleet procedures to formalize feedback from the Facility Safety Review Committee;



and (4) revising applicable Fleet procedures to require a review of 10 CFR 50.59 trends at Station Management Review meetings.

The inspectors noted that DNC's common cause evaluation charter and associated in-depth analysis was aligned with the Confirmatory Order action item requirement. The inspectors concluded that DNC's evaluation was appropriately focused, critical, thorough, and effective in identifying common causes. The inspectors also noted that DNC effectively used the CAP to identify, evaluate, and track the associated common cause related issues through resolution.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 11:**

By no later than June 30, 2016, DNC will complete a formal sampling program, using MIL Standard 105 or similar, of products (applicability determinations, screenings, and evaluations) completed using the DNC 10 CFR 50.59 programs and procedures.

- a. The reviewers conducting the sampling program will be third-party independent reviewers;
- b. Applicability determinations, screenings, and evaluations will be sampled as separate populations;
- c. For each population, the sampling time period will begin in 2002 and end as of the date of the Confirmatory Order;
- d. DNC will enter any identified deficiencies into DNC's CAP;
- e. Pursuant to Section 3.3 of the NRC Enforcement Policy, the NRC will consider exercising enforcement discretion to refrain from issuing a Notice of Violation or civil penalty for any non-willful Severity Level II, III, or IV violation identified as part of the sampling program described above, if the violation meets all of the following criteria:
  - i. The violation has the same or similar cause as the apparent violations of 10 CFR 50.59 that are the subject of the Confirmatory Order;
  - ii. The violation is a newly-found violation that occurred prior to issuance of the Confirmatory Order;
  - iii. The violation does not substantially change the safety significance or the character of the regulatory concerns arising out of the apparent violations that underlie the Confirmatory Order; and
  - iv. The violation is corrected, by both immediate corrective action(s) and long-term comprehensive corrective action(s), within a reasonable time following identification.
- f. The NRC will also consider discretion for any DNC-identified performance deficiencies that meet the above-listed criteria and are categorized as a Green or White finding under the NRC's Reactor Oversight Program.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its independent verification that DNC had completed a formal sampling program of products completed using the DNC 10 CFR 50.59 programs and procedures. In December 2015, DNC contracted with Preferred Licensing Services (PLS) to perform a third-party independent formal sampling program of 10 CFR 50.59 products completed using DNC's 10 CFR 50.59 programs and procedures during the period January 1, 2002, through August 26, 2015. PLS conducted the third-party independent formal sampling during the

period January 5, 2016, through June 3, 2016. PLS used a random sampling process per MIL-STD-105E that resulted in the selection of 16 evaluations, 203 screens, and 320 applicability reviews (determinations) for detailed third-party independent review. The PLS team included a few additional documents in their sample to ensure that the sample size exceeded the minimum sample size specified by MIL-STD- 105E.

Based on a resume review, the NRC noted that each of the seven members of the formal sampling team was independent of DNC and was experienced in the 10 CFR 50.59 process. The NRC noted that the PLS team's independent 10 CFR 50.59 reviews were methodical, critical, second-checked, and well-documented. In addition, the NRC noted that DNC personnel implemented corrective actions associated with the identified issues commensurate with their safety significance using the DNC CAP. The NRC reviewed all the PLS review forms (10 CFR 50.59 independent review documentation) for each of the evaluations and screens, and the majority of PLS review forms for the applicability reviews. The NRC also independently-reviewed nine screens and three applicability reviews that the PLS sampling team reviewed. The NRC compared the screens and applicability reviews, including supporting documents, to the guidance and methods provided in NEI 96-07, "Guidelines for 10 CFR 50.59 Evaluations," to determine the adequacy of these 50.59 products. In addition, the NRC Modification and 50.59 Team independently reviewed four of the 50.59 evaluations that the PLS sampling team reviewed (see NRC Evaluation of Changes, Tests, or Experiments and Permanent Modifications Team Inspection Report 05000336/2016007 and 05000423/2016007) with no resultant findings of significance.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 12:**

By no later than thirty (30) calendar days after the issuance of the Confirmatory Order, DNC's Chief Nuclear Officer (CNO) will issue a fleet-wide communication (written or recorded) to reinforce the importance of providing complete and accurate information to the NRC, including requirements for updating out-of-date information, and the potential consequences of a failure to comply with these requirements. The communication, whether written or recorded, and any associated materials or references, will be made available to the NRC.

**Actions Taken and NRC Conclusion:**

The NRC verified that DNC's CNO issued a written fleet-wide communication dated September 14, 2015, to reinforce the importance of providing complete and accurate information to the NRC, including requirements for updating out-of-date information, and the potential consequences of a failure to comply with these requirements.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 13:**

By no later than December 31, 2016, DNC will provide a presentation at an industry forum to discuss the events that led to the Confirmatory Order, the lessons learned, and actions taken. The presentation and any associated material will be made available to the NRC.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its review of the presentation slides and talking points used by DNC

senior management during a presentation on 10 CFR 50.59 at the Institute of Nuclear Power Operations Engineering Vice Presidents meeting on October 12, 2016. The NRC noted that DNC's presentation fully satisfied the Confirmatory Order Commitment requirement.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 14:**

DNC will review its plant access training and revise it as necessary to ensure that it includes training on compliance with NRC requirements, including, but not limited to, 10 CFR 50.5 and 50.9. Any revisions will be made available to the NRC.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its evaluation of DNC's review of plant access training (PAT) and appropriate completed revisions. On November 3, 2015, DNC documented completion of their PAT review (CA3009058). DNC determined that there was sufficient training on compliance with 50.5 and 50.9 prior to issuance of the Order; however, the reviewer recommended explicitly referencing 50.5 in the discussion of willful misconduct as a beneficial enhancement. The training staff agreed with the reviewer's recommendation and modified the applicable PAT slide accordingly. The inspectors reviewed the applicable PAT slides, and determined that the training material covered compliance with NRC requirements, including 10 CFR 50.5 and 50.9, in sufficient detail.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 15:**

Notwithstanding that NRC and DNC disagree about whether a willful violation occurred, DNC will develop and provide focused training to DNC corporate Engineering and Licensing personnel who perform work for Millstone and to DNC Engineering and Licensing personnel, to ensure awareness of the importance of complying with regulatory requirements, and the potential consequences of a failure to comply, including what constitutes a willful violation of NRC requirements. DNC will provide this training by April 1, 2016, and will repeat it 12 months after the initial training session. The training and any associated training materials will be made available to the NRC.

**Actions Taken and NRC Conclusion:**

In NRC Inspection Report Nos. 05000336/2016004 and 05000423/2016004 (ML17033A106), the NRC documented its evaluation of DNC's training that was implemented in response to Commitment 15 and 16. DNC Licensing developed and recorded a 90-minute regulatory sensitivity and awareness training video titled "Understanding the NRC/Licensee Interface" to comply with Confirmatory Order Commitments 15 and 16. Based on recorded training documentation, DNC licensing presented this training video to DNC corporate engineering and licensing personnel who perform work for Millstone and to Millstone engineering and licensing personnel during the period October 13, 2015, through March 7, 2016. In addition, DNC licensing created a training assignment, via their Learning Management System, for all applicable DNC corporate and Millstone site personnel to repeat this regulatory sensitivity and awareness training after February 19, 2017, with a completion date of March 31, 2017, for Millstone site personnel (prior to the Millstone 2R24 outage) and prior to April 14, 2017, for

DNC corporate personnel. Based on interviews, the inspectors noted that DNC personnel commented positively on the training and retained adequate knowledge of the subject matter. The inspectors viewed the 90-minute regulatory sensitivity and awareness training video and noted that the training video was of high quality, was appropriately focused, and fully satisfied the Confirmatory Order action item requirements.

The NRC concludes that DNC satisfactorily completed this commitment.

**Commitment 16:**

DNC will develop and provide focused training to DNC corporate Engineering and Licensing personnel performing work for Millstone and to DNC Engineering and Licensing personnel, covering the requirements of 10 CFR 50.9, emphasizing the importance of providing complete and accurate information to the NRC and of informing the NRC promptly upon discovery of inaccurate information or omissions associated with pending NRC licensing actions or other information submitted to the NRC. DNC will provide this training by April 1, 2016. The training and any associated training materials will be made available to the NRC.

**Actions Taken and NRC Conclusion:**

See Actions Taken and NRC Conclusion for Commitment 15 above.

The NRC concludes that DNC satisfactorily completed this commitment.