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Docket Number 50-346

License Number NPF-3

Serial Number 3284

August 15, 2006

United States Nuclear Regulatory Commission  
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Subject: Regulatory Commitment Change Summary Report (May 18, 2002 - May 31, 2006)

Ladies and Gentlemen:

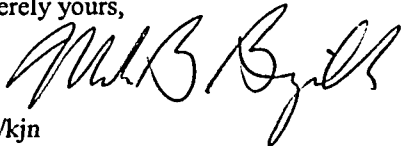
The FirstEnergy Nuclear Operating Company (FENOC) hereby submits the attached Regulatory Commitment Change Summary Report for the Davis-Besse Nuclear Power Station, Unit Number 1 (DBNPS), as discussed in NEI Commitment Management guidance and implemented by the DBNPS commitment management procedure.

The DBNPS commitment changes identified between the dates of May 18, 2002 and May 31, 2006 are included in Attachment 1 of this report. This report includes a description of the identified commitments, a summary of the changes made to the commitments, and a brief statement describing the basis for the change. FENOC has reviewed and implemented the commitment changes and has determined that the submittal of this report is the only required notification regarding changes to commitments listed in the attached summary.

This report covers four years of commitment changes due to a missed submittal of a Regulatory Commitment Change Summary Report in 2004. This missed submittal was documented in the DBNPS Corrective Action Program. The last submittal of a Regulatory Commitment Change Summary Report was on November 18, 2002 (Serial 2824).

Attachment 2 identifies that there are no commitments contained in this letter. If there are any questions or if additional information is required, please contact Mr. Gregory A. Dunn, Manager – FENOC Fleet Licensing, at (330) 315-7243.

Sincerely yours,



KJN/kjn

Attachments

cc: DB-1 NRC/NRR Project Manager  
Regional Administrator, USNRC Region III  
DB-1 NRC Senior Resident Inspector  
Utility Radiological Safety Board

A001

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| COMMITMENT<br>NUMBER / SOURCE / DATE                      | COMMITMENT<br>DESCRIPTION   | CHANGE  | REASON FOR CHANGE  |
|---|---|---|--|
| O01094, O01095, O01102<br>Serial Letter 0220<br>2/18/1977 | Outlines the events during a cooldown or plant startup in which operator actions prevent the possibility of overpressurization and identifies when the HPI (high pressure injection) system will be tested. | Overpressurization controls were implemented through procedural controls by isolating the BWST (borated water storage tank) suction to the HPI pump in DB-SP-10030. | DB-SP-10030, HPI Pump 1 Mode 5 Enhanced Baseline Testing in Piggyback, was used in 13RFO to develop a curve and to obtain additional data for rotor dynamics analysis, including critical speed. This test was an infrequently performed test that was cancelled after 13RFO so no permanent commitment change was made. |
| O01483<br>GL 83-028, Serial Letter 1000<br>11/07/1983     | All nuclear safety related administrative procedures are reviewed and approved by the Quality Assurance department and implementation is verified during audits.  | Commitment closed.  | With current programmatic (audit) reviews in place, a separate in-line review of procedures by Quality Assurance is redundant and unnecessary.   |
| O01487<br>GL 83-028, Serial Letter 1000<br>11/07/1983     | Audit reports are reviewed and approved by the Supervisor – Supplier Quality Unit and distributed to management of the audited organization.  | Commitment closed.  | This commitment was redundant with the intent of the requirements of ANSI N45.2.12-1977.   |

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|--|---|---|--|
| O01500<br>GL 83-028, Serial Letter 1000<br>11/07/1983  | All procurement documents identified as Q-list, fire protection and/or ASME must be reviewed/approved by the Facility Engineering Department and by the Quality Engineering Department.   | Procurement documents are reviewed/approved by Procurement Engineering.   | The Procurement Engineer is tasked with this activity and may request a formal review by other disciplines as deemed necessary.  |
| O01727<br>GL 81-004, Serial Letter 0720<br>6/02/1981   | The procedure for loss of all AC power is covered in the requalification training during the standard and emergency operating procedure training. Any procedure revisions will be covered in a method appropriate to the magnitude of the revision.               | Commitment closed.  | The licensed operator requalification program is now designed using the Systematic Approach to Training (SAT) process that determines training needs based on job analysis and needs analysis. |
| O01945<br>IR 79-003, Serial Letter 1-0053<br>3/26/1979 | In order to prevent another occurrence of unlocked high radiation areas, the location of all areas greater than 1000 MR/HR have been locked and these areas are logged in the high radiation locked area book. These areas have special locks labeled with a tag. | Replaced the high radiation locked area book with the Barricade and Barrier Posting and Integrity Checklist. Deleted the tags on the locks. | Each lock is stamped (into the metal of the lock) with a unique identifying number that corresponds to the key.  |

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| O02998<br>IR 84-012, Serial Letter 1-0463<br>9/20/1984   | The Conditions Adverse to Quality program implements the requirements of 10 CFR 21.   | Commitment closed.   | The Corrective Action Program maintains this compliance as it requires a determination if the condition is reportable under 10 CFR 21, and if required, completion of a 10 CFR 21 Decision Checklist. |
| O03251<br>IR 84-028<br>1/18/1985                         | Adequate procedural guidance had been added to prevent the use of a test outline instead of a test procedure.   | Commitment closed.   | The practice of using a test outline has been discontinued. Approved procedures are used to perform testing.  |
| O03520<br>LER 86-031, Serial Letter 1-0674<br>10/13/1986 | The Technical Specifications Surveillance Specialist will maintain a current list of all surveillance tests that will go late during the next 72 hours. This list will be hand delivered daily to the shift manager and appropriate department heads. Friday's list will include tests which will be late up to and including Monday. | Deleted hand delivery of report and that Friday's list will include tests which will be late up to and including Monday. | The subject report is available on-line to anyone, including the shift manager and department heads and is kept current.  |

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|---|---|--|---|
| O04716<br>IEB 80-024, Serial Letter 1-0179<br>1/05/1981 | A general inspection of containment is required to be performed by Plant Startup Procedure prior to reaching criticality on each plant startup. (This inspection is for water damage from open system leakage.) | The inspection is performed when there are indications of open system leakage. | The station has the capability to identify leakage and differentiate which system is leaking. To limit dose and for safety reasons related to low containment oxygen levels, this change was made to inspect affected areas in containment when there are indications of open system leakage. |
| O04848<br>GL 85-002, Serial Letter 1161<br>6/24/1985    | When loose parts are suspected, the Vibration & Loose Parts "crash cart" is dispatched to further analyze the noise and determine the location of the suspected loose part.                                     | Deleted all references to the crash cart and equipment located on it.          | The crash cart was rarely used and created a physical nuisance to store in the Control Room. Newer equipment is available in the Metrology Lab and no longer needs to be stored on a crash cart.  |
| O05558<br>GL 87-012, Serial Letter 1423<br>9/23/1987    | Pumps which may be used to control RCS (reactor coolant system) inventory include . . . the primary transfer pumps.   | Delete primary transfer pumps as part of this commitment.                      | These pumps were abandoned in place by plant modification 95-0050-00, Abandon Primary Water Storage Tank (and System).  |

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|---|--|---|---|
| O06761<br>Serial Letter 1368<br>4/20/1987 | An updated list of abbreviations, acronyms, and symbols will be available after the control room indications and controls are re-labeled. When the list is available, it should be added to the writer's guide. Plant abbreviations and acronyms are included in the writer's guide. | Commitment closed.  | The philosophy for the use of acronyms and abbreviations has changed and their use should now be minimized. When used, it is more appropriate to have the acronym/abbreviation defined within the procedure itself so end users can easily locate the definition. |
| O09319<br>LER 78-019<br>3/07/1978         | The mechanical stops of valves DH14A and DH14B are now tagged to prevent incorrect resetting of these stops. The correct settings should be 47 degrees open for DH14A and 45 degrees open for DH14B.   | Deleted the specific settings identified in the commitment. | The valve position is controlled by test procedures and changes depending on the test results. The Engineering Change Request process controls the procedure changes and tag changes required to reflect the new valve settings.                                  |
| O09551<br>IR 86-005<br>4/18/1986          | Establish controls so that regulatory applicability determinations are written on use-as-is and repair condition reports.  | Commitment closed.  | Controls are in place to ensure this action is completed. The Corrective Action Program includes instructions on what documentation is required for a use-as-is or repair disposition.  |

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| O11711<br>IR 84-028, Serial Letter 1-0401<br>1/06/1984 | The condition report procedure was revised to include the notification of the Regulatory Affairs section if the engineering evaluation indicates the system or component is unable to perform its intended safety function.  | Commitment closed.   | The Corrective Action Program requires Regulatory Affairs to review all new condition reports for a reportability determination. Also, the SRO notifies/involves Regulatory Affairs as required for Operability Determinations or hardware dispositions. |
| O11735<br>SRTP HVAC-NRR-2<br>9/30/1986                 | Initiate complete air flow balance of the control room HVAC system, including vibration testing of all rotating equipment. Preventive maintenance activities have been initiated to quarterly monitor the supply and return air fans vibration.  | Changed to periodically monitor the supply and return.   | The appropriate frequency is determined and controlled by the Preventive Maintenance Program to ensure equipment reliability.  |
| O12113<br>Serial Letter 1-0132<br>5/23/1980            | Health Physics procedure was revised to include more stringent requirements for entering locked high radiation areas. These include verbal permission from a Chemistry and Healthy Physics management individual and a requirement to use two different types of high range survey meters. | Verbal permission is obtained from Chemistry and Radiation Protection Supervisor. Deleted the requirement to use two different types of survey meters. | The name of the management individual who provides verbal permission is more strictly defined. Electronic alarming dosimeters did not exist when this commitment was made. The use of this new equipment eliminates the need for two survey meters.      |

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|---|--|---|---|
| O12319<br>IR 88-012, Serial Letter 1-0839<br>10/25/1988 | Condition Report procedure corrected any interpretive problems with the condition report process to ensure that these types of problems (i.e. once a condition report is initiated it must be processed) do not recur in the future. | Commitment closed.  | The Corrective Action program addresses this aspect and the creation of the electronic process for initiating and processing of a condition report also helps prevent the situation of not processing any that have been initiated. |
| O12617<br>SRTP CAC-RR-1<br>9/26/1986                    | Create a PM which will provide maintenance in accordance with the manufacturer's recommendations for backdraft dampers. Incorporate the requirements of the American Warming and Ventilating Manual.                                 | Changed the frequency to 24-month interval and modified the commitment to have the frequency of the PM determined and controlled by the Preventative Maintenance Program. | Frequencies are adjusted in accordance with the Preventative Maintenance program based on system/component performance and maintenance feedback.  |



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|--|--|---|---|
| O12638<br>SRTP HVAC-RR-2<br>9/30/1986  | Preventive Maintenance procedures have been developed for both trains of CREVS. Every three months PM 1188 and 1189 are performed to verify proper oil level and ensure adequate charge on the system in both air-cooled and water-cooled modes. | Changed to periodically perform the PMs.                      | The appropriate frequency is determined and controlled by the Preventive Maintenance Program to ensure equipment reliability.   |
| O12676<br>SRTP HVAC-NRR-7<br>9/30/1986 | PM 2604 performs an annual check of the control dampers. PM 3075 and PM 2994 annually check the calibration of the chilled water control string. PM 2635 will annually check the calibration of the switchover instrument string.                | Deleted the requirement to inspect these components annually. | A review of the maintenance history did not demonstrate a reliability problem. The frequency of preventive maintenance is determined and controlled under the Preventive Maintenance program. |

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|---|---|--------------------|--|
| O12763<br>IR 81-003<br>4/17/1981          | In order to improve response times on audit finding reports, "Prompt Response to Internal Audit Finding Reports" procedure has been prepared and approved implementing more stringent requirements regarding audit finding report (AFR) response, tracking and time extensions. | Commitment closed. | Preventive actions have remained as an integral part of the licensee structure and the corrective actions to prevent recurrence have been effective. This is covered by the Corrective Action program. In addition, the FENOC Quality Assurance Program Manual commits to Regulatory Guide 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants". |
| O13043<br>Serial Letter 0816<br>5/10/1982 | The Davis-Besse requalification program does mandate an accelerated requalification for any operator scoring less than 80% overall. In addition, the operator is removed from license duties during the accelerated requalification.  | Commitment closed. | The licensed operator requalification program is now designed using the Systematic Approach to Training (SAT) process that determines training needs based on job analysis and needs analysis. Remediation is part of the SAT process and is required prior to returning an operator to licensed duties.   |

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|--|---|--|--|
| O13351<br>IR 86-030<br>3/18/1987                       | The auxiliary feedwater high speed stop has been increased so that minimum speed during surveillance testing is not less than 3582 rpm.                             | Commitment closed.                         | A Technical Specification change was made to reduce required auxiliary feedwater flow and high speed limiter setpoints were increased in the surveillance test procedures. The calculation and engineering change modification processes control any changes to setpoints in the procedures. |
| O13442<br>IR 84-001, Serial Letter 1-0431<br>5/22/1984 | Procedure for performance of surveillance & periodic tests was modified to instruct the shift manager to either hold or suspend the test if it cannot be completed. | Deleted the option of suspending the test. | This was part of a common process initiative.  |

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|--------------------------------------|---|--|---|
| O13558<br>IR 85-007<br>5/14/1985     | Procurement procedure contains instructions to ensure that procurement quality requirements are updated on the computer and in procedures when they are changed.  | Procurement technical and quality requirements are updated on the computer only. | This minimizes the risk of conflicting information.   |
| O13560<br>IR85-004<br>3/27/1985      | Training department procedures were written and implemented to address the documentation of the evaluation of operator and senior operator exams and the inclusion of identified deficiencies into succeeding lesson plans. | Commitment closed.   | Use of personnel performance and feedback to evaluate and modify training programs is a requirement of accreditation. This has been captured as part of a process that is subject to a regulated revision/review process. |

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|--|--|--|--|
| O13644<br>IR 85-030, Serial Letter 1-0604<br>1/27/1986 | One procedure will provide a consistent mechanism for identifying items which are potentially adverse to quality. Trending of condition reports will be required to ensure that significant problems will be identified even if systems are not determined to be inoperable. | Commitment closed.   | Preventive actions have remained as an integral part of the licensee structure and the corrective actions to prevent recurrence have been effective. The Corrective Action Program and the Quality Assurance Program Manual addresses these items. |
| O13664<br>IR 05-028, Serial 1-0600<br>12/26/1985       | Procedure was revised to include several QC (Quality Control) verification hold points which will allow for appropriate QC review of the BISCO boot seal fabrication and installation.   | QC maintains hold/witness points via a database in SAP. A statement was added to the procedure that the work document has been processed through QC for determination of QC Hold/Witness Points. | This was a result of a change in process for QC.   |

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|---|--|--------------------|--|
| O13722<br>COA Section 2.B.3 Rev. 6<br>1/03/1986   | Develop a station administrative procedure to assure that identified concerns will be formally elevated to appropriate levels of engineering and management for resolution, will have required response dates, will identify individuals responsible for resolution and for implementing resolution. | Commitment closed. | The Request for Assistance procedure was cancelled. These types of requests are handled as part of the Corrective Action Program for issues pertaining to conditions adverse to quality and part of the FENOC Activity Tracking program for issues that do not pertain to conditions adverse to quality. |
| O13755<br>COA Section App.3.2 Rev. 6<br>1/03/1986 | A dedicated surveillance function is established to supplement the formal audit program.   | Commitment closed. | With the current implementation of the internal assessment process (continuous assessment) a surveillance function is not needed.  |

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|---|---|---|---|
| O13756<br>COA Section App.3.2 Rev. 6<br>1/03/1986 | Develop a nuclear mission<br>procedure "Request for<br>Assistance" that contains mission<br>wide requirements in this area.           | Commitment closed.  | The Request for Assistance<br>procedure was cancelled. These<br>types of requests are handled as<br>part of the Corrective Action<br>Program for issues pertaining to<br>conditions adverse to quality and<br>part of the FENOC Activity<br>Tracking program for issues that<br>do not pertain to conditions<br>adverse to quality. |
| O14274<br>IR 86-022<br>11/07/1986                 | Procedure requires justification for<br>engineering evaluations<br>commensurate with the level of<br>detail of the original question. | These requirements were<br>transferred to the Corrective<br>Action Program. | The Request for Assistance<br>procedure was cancelled and the<br>Corrective Action Program used to<br>address these types of requests.  |

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|---|---|--------------------|--|
| O14832<br>Serial Letter 1066<br>8/14/1984 | Verify that samples for offsite laboratory analysis will be transported using licensed carriers. Identify the offsite laboratory or laboratories expected to be used. | Commitment closed. | Davis-Besse can perform the required analyses and an offsite laboratory is not required. |
| O14872<br>Serial Letter 1685<br>7/31/1989 | Valves in the fire protection system are locked in the open position and inspected monthly to verify their position.  | Commitment closed. | This is part of the Fire Hazards Analysis Report now.                                    |



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|---|--|--------------------|--|
| O14979<br>Serial Letter 1368<br>4/20/1987         | Licensed operators will be trained on future revisions of EP 1202.01 prior to implementation or prior to returning control room duties after absences. Minor editorial procedure revisions will be exempt from this training requirement.  | Commitment closed. | The licensed operator requalification program is now designed using the Systematic Approach to Training (SAT) process that determines training needs based on job analysis and needs analysis. Significant changes to DB-OP-02000 (EP 1202.01) would trigger a needs analysis under this process to determine what additional skills and knowledge the operators may need as a result of the procedure change. |
| O15037<br>COA Section App.3.2 Rev. 6<br>1/03/1986 | Procedures are developed to implement the Quality Assurance Program requirements and to define responsibilities for inter-divisional nuclear program activities. In particular, these procedures address the communication for identification, review, and disposition of condition reports. | Commitment closed. | Preventive actions have remained as an integral part of the licensee structure and the corrective actions to prevent recurrence have been effective. This is an integral part of the Corrective Action Program.  |

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|---|--|---|---|
| O15050<br>IR 84-019, Serial Letter 1-0488<br>12/14/1984 | Qualitative fit test will be performed in accordance with NUREG-0041, Section 8.5. This section requires the individual undergoing respirator fit testing to perform several simulated work activities including "running in place". | Changed to Quantitative fit test and substituted bending at the waist for running in place. | The quantitative fit test is a better method as it verifies a fit factor of 1000 for full factor respirator. Davis-Besse environment permits bending, therefore, running in place is not utilized.  |
| O15094<br>Serial Letter 1-0674<br>10/13/1986            | The Maintenance Training department now reviews procedure changes to determine the need for craft training.  | Commitment closed.  | Maintenance training programs are part of the accreditation process. Training materials are maintained based on meeting the requirements of ACAD 02-001, Accreditation Objectives and Criteria, criterion 6.5. 10 CFR 50.120 requires that nuclear power stations obtain and maintain accreditation and Davis-Besse UFSAR section 13.2.1 commits the station to 10 CFR 50.120 and identifies that the maintenance training programs are accredited. This has been captured as part of a process that is subject to a regulated revision/review process. |

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| O15257<br>Serial Letter 1437<br>10/29/1987 | Periodically (annually) review Physical Security and Contingency Plans and procedures to evaluate their potential impact on plant and personnel safety. | Commitment closed. | The Industrial Security Plan was superseded by the Physical Security Plan that implemented new requirements under NRC Order 03-086.   |
| O15461<br>Serial Letter 1953<br>7/12/1991  | Identifies conditions, limitations, and restrictions that apply to the use of MSA GRM-I canisters for radio-iodine protection.                          | Commitment closed. | This commitment existed to ensure compliance to an NRC approved exemption to 10 CFR 20. Davis-Besse is following the code and chose not to utilize this approved exemption. |

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| O15555<br>GL 89-013, Serial Letter 1-1022<br>9/09/1993 | Test requirements for heat exchangers included in performance test program.   | Removed DB-PF-04729, Containment Air Cooler Monitoring Test, from the GL 89-013 performance test program. Changed PM 5536, 5537 and 5538 to clean inside the tubes at interval determined by the Preventive Maintenance program. | This test does not test/determine nor obtain data that can be used to determine the heat transfer capability of the Containment Air Coolers (CAC) as requested by GL 89-013. Also, the frequency of the PMs is determined and controlled by the Preventive Maintenance program. |
| O15845<br>IR 90-010<br>7/20/1990                       | Modification packages were sampled and evaluated. As a result of one of these reviews on the EDG (Emergency Diesel Generator) Fuel Oil Storage Tank Level Indication, data packages LI/LT4891 and LI/LT4892 were changed to incorporate the concerns of the inspection team. This change included a five point check from 32,000 gallons to 39,850 gallons. | Changed to "a five point check from the Technical Specification low level set point to the high level trip set point".   | The data package set points were changed to account for the fuel in the tanks that is not usable. The alarming level will be more conservative and the data derived from the level indicators will be more accurate.  |

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|---|--|--------------------|---|
| O16304<br>Serial 1965<br>7/29/1991          | Training of workers on the proper use and the limitations of the GMR-I canisters will be performed prior to canister issuance.   | Commitment closed. | This commitment existed to ensure compliance to an NRC approved exemption to 10 CFR 20. Davis-Besse is following the code and chose not to utilize this approved exemption.   |
| O16350<br>Serial Letter 1-0957<br>7/31/1991 | An annual quality assurance surveillance of randomly selected procedures will be conducted. The annual surveillance will provide assurance that procedures are being maintained current. | Commitment closed. | This commitment originated as a result of a reduction in commitment to the quality assurance program description a number of years ago. This activity was deleted during the development of the FENOC Quality Assurance Program Manual. The NRC approved this change. |

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|--------------------------------------|---|--|--|
| O16400<br>LER 91-002<br>10/01/1991   | The administrative procedure governing surveillance test scheduling will be revised to include requirements for a multi-disciplined technical review when surveillance test frequency requirements are relaxed.         | A multi-disciplined technical review is not performed. A change in frequency is defined as an intent change and, as such, will receive a technical review by an individual assigned by the section manager. The section manager will approve the change. | This change was part of a new common process.  |
| O16682<br>LER 92-002 R1<br>5/08/1992 | Pre-job briefs will be performed except for frequently performed PMs and routine shop work. Personnel to be present at the pre-job brief as a minimum include the discipline maintenance supervisor and Operations SRO. | Pre-job brief will be performed as determined by the work group supervisor and the work group supervisor will also determine or recommend attendees for the pre-job brief.   | Briefing attendees are determined based on the scope and nature of work. There may be times when Operations or Maintenance may not be required to attend the brief, depending on the work scope and potential impact on the plant. |

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|--|--|---|---|
| O16912<br>IR 92-015<br>10/09/1992          | Low level radioactivity was found on HEPA filters near personnel clothing change out area. The vent pre-filter will be changed out every six months. | Changed to periodically change out the pre-filter.          | The appropriate frequency is determined and controlled by the Preventive Maintenance Program to ensure equipment reliability. |
| O16935<br>Serial Letter 2183<br>11/10/1993 | Control room programmer lamp fault light will illuminate if any of the contacts for any control rod groups programmer opens.                         | Deleted "programmer lamp fault" and added "electronic trip" | The programmers have been changed to solid state devices, eliminating the lamp fault light.                                   |

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|--|---|---|---|
| O17029<br>IR 92-019<br>2/10/1993           | To address root cause of boric acid addition from seat leakage past MU23, a temporary procedure change was issued to close manual isolation valve MU363 when recirculating a BAAT. This was to provide an additional isolation to prevent inadvertent addition of boric acid to the makeup tank when the BAAT (Boric Acid Addition Tank) system is pressurized. | MU40 is required to be closed, not MU363. | The final resolution of the condition report identified that MU40 was to be closed while performing recirculation of BAAT. MU363 is not required to be closed.                              |
| O17069<br>Telecon NLD93-05186<br>4/01/1993 | To prevent future pressure transients from occurring, changes must be made to prevent a void from forming in the high elevations of the piping or slowly collapse any voids formed. In the procedures, the inlet valves are kept open.  | The inlet isolations are kept closed.     | This was a result of a condition report that requires that the CAC (containment air cooler) operating procedure be changed to have the inlet isolations closed while the CAC is in Standby. |



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|--|--|---|--|
| O17160<br>IR 93-009, Serial Letter 1-1014<br>6/15/1993 | Increase the operating speed of AFW (auxiliary feedwater) Pump 1-1. This will raise the pump operating parameters to a point well above the minimum values such that instrument uncertainties are not significant. The high speed stop for AFW Pump 1-1 has been increased from 3600 to 3700 rpm.  | The high speed stop for AFW Pump 1-1 has been changed to 3676 (3666 to 3686) rpm.   | This was a result of Engineering Change Package 03-0411 (design change). |
| O17161<br>IR 93-009, Serial Letter 1-1014<br>6/15/1993 | Increase the operating speed of AFW (auxiliary feedwater) Pump 1-1. This will raise the pump operating parameters to a point well above the minimum values such that instrument uncertainties are not significant. Procedures will be revised to change the acceptance criteria for AFW pump testing to allow for instrument uncertainties and to specify that measured pump flow and discharge pressure will be used to demonstrate pump operability. | Procedures were changed to reflect that the high speed stop for AFW Pump 1-1 has been changed to 3676 (3666 to 3686) rpm. | This was a result of Engineering Change Package 03-0411 (design change). |

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|---|--|--|--|
| O17321, O17322<br>LER 93-006, Serial Letter 1-1036<br>3/14/1994 | Locking mechanisms for the CAC (containment air cooler) SW (service water) inlet valves will be fabricated. Once fabrication is complete the valves will be locked open and controlled under the Locked Valve program. | Commitment closed.   | CAC SW Inlet Valves (SW64, SW65, SW68, SW69, SW72, SW73) were removed from the plant as a result of Boric Acid Corrosion (Engineering Work Package, EWR 02-0343-00). Their removal facilitates deleting them from having to be locked open and controlled under the Locked Valve program.  |
| O17422<br>GL 89-013, IR 93-016<br>12/29/1993                    | Develop more definitive acceptance criteria for heat exchanger performance and system flow testing. (ECCS RM CLRS shall be greater than or equal to 100 gpm.)  | The acceptance criteria was changed for ECCS RM CLRS (emergency core cooling system room coolers) to be greater than 90 gpm. | This was determined by adding a calculated value from Proto-Power Calc #03-013 of 50 gpm, a degradation due to fouling value of 15 gpm, instrument error value of 22.9 gpm plus a rounding value of 2.1 for a total value of 90 gpm. This is in compliance with UFSAR Table 9.2-1, Note 1. |

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|---|--|---|--|
| O17534<br>Serial Letter 1-1036<br>3/14/1994 | Upper management and quality assurance are involved in the timeliness of corrective actions for significant conditions adverse to quality.                                     | Commitment closed.                                | Preventive actions have remained as an integral part of the licensee structure and the corrective actions to prevent recurrence have been effective. The Corrective Action Program addresses this as an integral part of the program.  |
| O17678<br>Serial Letter 1-1033<br>1/28/1994 | Modify procedure prerequisites to include PM test by voltage drop measurements on these relays GE type HFA and SFSEQ 1, 2, 3, & 4 relays. Trending of degradation is required. | No trending is required for SFSEQ 1, 2, 3, and 4. | The SFSEQ 1, 2, 3, and 4 relays are replaced every 24 months and relay contacts are tested quarterly by voltage drop measurements (with zero voltage drop criteria specified) under the PM program. Based on this conservative replacement interval, combined with quarterly testing of the relay contacts, no trending is required. |

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| O17843<br>IR 85-025<br>12/17/1985                      | A list of critical periodic tests has been compiled. These critical periodic tests have been identified as "critical" on the ST/PT (surveillance tests/periodic tests) computer schedule. | Remove DB-PF-03012, ECCS (emergency core cooling system) Integrated Train 2 Leakage Test, as a critical periodic test.   | This procedure was upgraded to a scheduled surveillance test and is no longer a periodic test. |
| O17902<br>IR 94-016, Serial Letter 1-1063<br>3/10/1995 | Improved 10CFR50.59 program by implementing a new computer-based training program and revising the procedure and screening form.  | An alternative to the computer-based training was added. This alternative is an instructor-led presentation. The site training section administers both courses. | This is a process improvement.   |

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| O18733<br>LER 97-008<br>4/17/1997                      | The 18 month surveillance test (SFAS Interchannel Logic Test) was performed and completed satisfactorily with no equipment deficiencies. The combination of this test and the existing quarterly tests provide an overlapping check of all required two-out-of-four logic in the output modules of SFAS (safety features actuation system). The 18 month surveillance test will continue to be performed on a quarterly frequency along with the quarterly tests so that a complete check of the two-out-of four logic gates in the individual SFAS output modules is performed. | The frequency was changed back to monthly for SFAS.  | The test frequency was changed from monthly to quarterly in License Amendment 230. This change was reported in the Commitment Change Summary Report (May, 1998 – May, 2000). This change of frequency applied to ARTS (anticipatory reactor trip system) only. The SFAS frequency remained monthly so the commitment text was corrected to reflect monthly for SFAS and quarterly for ARTS. |
| O19092<br>IR 97-012, Serial Letter 1-1144<br>12/4/1997 | Procedure was revised to specify the survey instrument to be utilized, an Extender 2000W, and to require two independent radiological surveys for all radioactive material shipments.  | Deleted the specific survey instrument and added "use the appropriate G-M tube survey instrument". | This supports using new equipment as existing instruments become obsolete, like the Extender 2000W.   |

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| O19094<br>IR 97-009, Serial Letter 1-1142<br>11/14/1997 | The condition report process procedure will ensure that a condition report identifying an increase in CDF (core damage frequency) beyond the non-risk significant criteria defined in EPRI will be elevated to a category requiring management oversight. | Commitment closed. | This was a result of an analysis conducted under the Corrective Action Program.  |
| O19125<br>Serial Letter 1-0658<br>8/29/1986             | The condition report procedure requires the designated on-shift SRO to review each condition report immediately after generation for conditions affecting plant operations.   | Commitment closed. | Preventive actions have remained as an integral part of the licensee structure and the corrective actions to prevent recurrence have been effective. The Corrective Action program covers this issue as an integral part of the program. |

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| O19129<br>LER 97-016<br>1/16/1998                      | Valves DH10 and DH26 were verified to be in the correct position which satisfies SR 4.5.2. These valves will be added to the monthly ECCS valve verification surveillance procedure. | Commitment closed. | The normal position of DH10 changed from a closed valve to a locked open valve and the normal position of DH26 changed to a locked closed valve. |
| O19340<br>IR 98-010, Serial Letter 1-1169<br>7/27/1998 | Additional enhancements will be made to the current audit schedule to separate certain activities into audit separate from the Radiation Protection audit.                           | Commitment closed. | Current Quality Assurance audit system is more rigorous and has more depth to ensure activities that require audit are accomplished.             |

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| O19383<br>IR 98-009, Serial Letter 1-1172<br>8/27/1998 | Containment Emergency Sump<br>visual inspection procedure has<br>been changed to include a<br>verification of the lead brick<br>placement and proper spacing.  | Commitment closed. | Lead bricks have been removed<br>from the Containment Emergency<br>Sump.  |
| O19819<br>Serial Letter 2633<br>3/15/2000              | Specific guidance will be provided<br>to control room operators to<br>ensure that no vapor entrainment<br>will damage the DHR/LPI (decay<br>heat removal/low pressure<br>injection) pump [for the backup<br>BPC (boric acid precipitation<br>control) method]. | Commitment closed. | The old backup method took a<br>suction from the hot leg. This<br>method is no longer used. A new<br>boric acid precipitation control<br>method was installed in<br>accordance with an NRC<br>approved exemption request. |



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| O19821<br>Serial Letter 2633<br>3/15/2000 | During implementation of the planned plant modification . . . procedural controls will be established to ensure that the CCW (component cooling water) inlet flow to the DHR (decay heat removal) cooler is at least 95 degrees Fahrenheit prior to establishing the backup BPC (boric acid precipitation control) method.   | Commitment closed.  | The old backup method took a suction on the hot leg and pumped highly borated water through the DHR Heat Exchanger. This no longer occurs with the new method. A new boric acid precipitation control method was installed in accordance with an NRC approved exemption request. |
| O19938<br>LER 00-005<br>7/07/2000         | Include in the Auxiliary Feedwater System procedure the weekly drain evolution. The procedure has a signoff to throttle open the 10 valves needed to perform the drain activities for both AFPT 1 and 2. Once each of the drains has been completed, a signoff and an Independent Verification are required for restoration. | Operators will perform the drain whenever the water level reaches 2 inches. | Water level indicators were installed on the AFPTs so that Operators can monitor the casing water level at least once per 12 hour shift in modes 1 through 3. The 2 inch level will indicate that no water has yet accumulated in the casing of the AFPTs.                       |

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|---|---|---|--|
| O21100<br>IR 03-010, Serial Letter 1-1336<br>11/23/2003 | Establish criteria and modify appropriate procedures to restrict the use of At-Risk Changes in the plant modification process. At-Risk Changes shall only be used to alter SSCs that are out of service and physically isolated from electrical and mechanical sources. | Structures are addressed differently than Systems and Components regarding inservice and out of service. At-Risk Changes can be used to alter or modify a Structure when the design and licensing bases functions of the Structure are maintained for plant conditions while the At-Risk Change is being implemented. | This was to clarify the use of an At-Risk Change with respect to Structures, Systems, and Components (SSCs). |

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List of Abbreviations Used

|        |   |
|--------|---|
| ANSI   | American Nuclear Standards Institute  |
| ASME   | American Society of Mechanical Engineers  |
| COA    | Course Of Action associated with June 9, 1985 Loss of Feedwater Event at Davis-Besse                    |
| CREVS  | Control Room Emergency Ventilation System   |
| DH     | Decay Heat  |
| GL     | Nuclear Regulatory Commission Generic Letter  |
| HVAC   | Heating, Ventilation, and Air Conditioning  |
| IEB    | Nuclear Regulatory Commission Information Bulletin  |
| IR     | Nuclear Regulatory Commission Inspection Report   |
| LER    | Licensee Event Report   |
| MU     | Make-Up   |
| NRC    | Nuclear Regulatory Commission   |
| PM     | Preventive Maintenance  |
| SAP    | A computer application used to store information about plant equipment and plant maintenance activities |
| SERIAL | Letter from Davis-Besse Nuclear Power Station to Nuclear Regulatory Commission                          |
| SRTP   | Pre-Startup System Review and Test Program  |
| SW     | Service Water   |
| UFSAR  | Updated Final Safety Analysis Report  |

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**COMMITMENT LIST**

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. IF THERE ARE ANY QUESTIONS OR IF ADDITIONAL INFORMATION IS REQUIRED, PLEASE CONTACT MR. GREGORY A. DUNN, MANAGER – FENOC FLEET LICENSING (330) 315-7243.

| COMMITMENTS | DUE DATE |
|-------------|----------|
| None        | N/A      |