



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

September 12, 2011

Mr. J. R. Morris
Site Vice President
Catawba Nuclear Station
Duke Energy Carolinas, LLC
4800 Concord Road
York, SC 29745

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 – AUDIT OF THE
LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS.
ME5095 AND ME5096)

Dear Mr. Morris:

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

The NRC's Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of 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 to determine whether regulatory commitments are being effectively implemented.

An audit of the commitment management program for the Catawba Nuclear Station, Units 1 and 2 (Catawba 1 and 2) was performed during the period December 1, 2010, through March 11, 2011. The audit was performed at the Catawba 1 and 2 site, as well as NRC Headquarters, using documentation from NRC sources as well as that provided by Duke Energy Carolinas, LLC, (the licensee) as requested by the NRC staff.

As discussed in the enclosed audit report, the NRC staff has made observations regarding both the consistency of the licensees' program with the industry guidance in NEI 99-04 and the effectiveness of the implementation of regulatory commitments. The documentation of these observations in this audit report is the only action that the NRC staff is taking at this time. This audit report is being provided to the NRC resident inspector staff at your plant for any further followup. The NRC staff will contact you in the future if we wish to discuss any further issues associated with your Regulatory Commitment Program.

J. Morris

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If you have any questions, please call me at 301-415-1119.

Sincerely,

A handwritten signature in black ink that reads "Jon Thompson". The signature is written in a cursive, flowing style.

Jon Thompson, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

Enclosure:
Audit Report

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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE MANAGEMENT OF REGULATORY COMMITMENTS

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-413 AND 50-414

1.0 INTRODUCTION AND BACKGROUND

In Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC [Nuclear Regulatory Commission] Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS), Accession No. ML003741774), the NRC staff informed licensees that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes" (ADAMS Accession No. ML003680088) contains acceptable guidance for controlling regulatory commitments and 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's Office of Nuclear Reactor Regulation (NRR) has instructed its staff through NRR Office Instruction LIC-105, Revision 3, "Managing Regulatory Commitments Made by Licensees to the NRC" (ADAMS Accession No. ML090640415), 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 whether regulatory commitments are being effectively implemented. (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). An audit of the licensee's commitment management program is conducted by the NRR Project Manager responsible for that nuclear station and assesses 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 (GLs), etc.) conducted since the last audit.

2.0 AUDIT SCOPE AND METHODOLOGY

An audit of the commitment management program for the Catawba Nuclear Station, Units 1 and 2 (Catawba 1 and 2) was performed during the period December 1, 2010, through March 11, 2011. The audit was performed at the Catawba 1 and 2 site, as well as NRC Headquarters, using documentation from NRC sources as well as that provided by Duke Energy Carolinas, LLC, (Duke Energy, the licensee) as requested by the NRC staff.

This was the second commitment management audit conducted by the NRC staff for Catawba 1 and 2. The first commitment management audit for Catawba 1 and 2 was conducted during the period of March 15, 2008, through October 15, 2008, and was documented in an NRC staff audit report dated October 30, 2008 (ADAMS Accession No. ML083040184). For the current audit, the NRC staff reviewed commitments made by the licensee during the period from October 1, 2008, through November 30, 2010. The audit consisted of two major parts: (1) audit

Enclosure

and assessment of the licensee's program for managing changes to NRC commitments and (2) assessment and verification of the licensee's implementation of NRC commitments during the period of the scope of the audit, with a special focus on those that have been completed.

This section, Section 2.0 will first discuss the scope of the audit, describing which regulatory commitments were selected for the audit, what documentation was reviewed and which licensee personnel were interviewed. The balance of Section 2.0 will then discuss the methodology of the audit, with an emphasis on the criteria which were used to review licensee regulatory commitments and associated documentation. Section 3.0 will discuss the observations which arose from the audit. The overall conclusions from the audit will be discussed in Section 4.0.

2.1 Scope

The audit addressed both the licensee's program for management of regulatory commitments, as well as a sample of commitments made during the audit period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, granting relief, exemptions, etc.) or licensing activities (bulletins, GLs, etc.). The sample of regulatory commitments and associated documentation was selected from licensing activities from October 1, 2008, through November 30, 2010. The commitments are listed in the review summary charts in the attached Table 1, "Summary of the NRC Audit of Commitments Related to Catawba 1 and 2 Licensing Actions and Licensing Activities, October 1, 2008, through November 30, 2010."

NRR Office Instruction LIC-105, Revision 3, limits the audit of commitments to those made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Accordingly, the audit excludes the following types of commitments:

- (1) Commitments as a result of Licensee Event Reports (LERs) - These commitments are controlled by the licensee's LER process, which is imposed by Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.73.
- (2) Commitments made on the licensee's own initiative among internal organizational components.
- (3) Commitments that pertain to milestones of licensing actions or 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 or activity was completed.
- (4) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, technical specifications (TSs), and updated facility safety analysis reports (UFSARs). Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

The activities associated with the audit included (1) a review of documents associated with regulatory commitments, (2) pre-site visit coordination with the licensee, including a list of

requested documentation and site visit support needs, (3) a site visit, including a closing discussion with the licensee and the NRC resident inspector staff, (4) another review of documents after the site visit using insights and information gained from the site visit, (5) preparation of the audit report.

The licensee personnel interviewed during the site visit included M. Sawicki, M. Murdo, R. Hart, and S. Putnam.

2.2 Methodology

The audit began with a search in ADAMS for licensee commitments associated with Catawba 1 and 2 during the period of the audit scope, October 1, 2008, through November 30, 2010. As there were not a large number of regulatory commitments made during this time frame, a careful selection of the sample from these regulatory commitments addressed most of the significant regulatory commitments made during this time frame. Of the regulatory commitments not addressed for Catawba 1 and 2, some were regulatory commitments made for both Catawba 1 and 2 and McGuire Nuclear Station, Units 1 and 2 (McGuire 1 and 2), as part of a four unit license amendment request for these plants and are being addressed for McGuire 1 and 2 by a concurrent review of the regulatory commitment program for that plant. During the first part of the audit, and prior to the site visit, the list of the regulatory commitments selected for the scope of the audit for Catawba 1 and 2 was provided to the licensee's regulatory compliance group (ADAMS Accession No. ML103570014) with a request to provide; (a) plant documentation related to the program for managing regulatory commitments; (b) plant documentation (Problem Investigation Program (PIP) data entries, plant data bases, etc.) used to track each individual commitment; and (c) documentation which verifies the progress made in completing the regulatory commitments selected for the audit including, as appropriate, a copy of the revised documents (plant procedures, UFSARs, TSs, etc.) if the required actions had already been completed. During the site visit, the list of regulatory commitments selected for the scope of the audit was expanded to include licensee responses to GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" issued by the NRC staff on January 11, 2008.

One key feature of the audit was to measure licensee performance in regulatory commitment management against the requirements described in the licensee document Nuclear System Directive (NSD) 214, "Regulatory Commitment Management Program." The licensee uses NSD 214 to implement the regulatory commitment management program outlined in NEI 99-04 at all Duke Energy plants, including Catawba 1 and 2. One issue in the conduct of the audit was that NSD 214 underwent a significant revision during the time period of the scope of the audit (in June of 2010). However, the scope of the revision did not have a significant bearing on the observations made during the course of the audit.

Of greater significance were revisions to the licensee procedure NSD 208, "Problem Investigation Program (PIP)," made during the time period of the scope of the audit (e.g. revisions in June of 2009 and July of 2010). This document is important because the licensee uses the database for their PIP to track regulatory commitments to completion. One of the more important aspects of these revisions was to more clearly delineate the controls for closing out

items in the PIP database. Where these revisions to NSD 208 had a bearing on observations made during the audit, the report will discuss the potential impact, but no significant impacts were observed.

During the site visit, the priority was to access information which was uniquely available at the site and critical to assessing the licensee's efforts at managing regulatory commitments. Licensee personnel provided all documentation requested in a timely manner. The site visit began with an examination of documents relevant to the program used by the licensee to manage its regulatory commitments. This knowledge of the licensee's program for managing regulatory commitments was subsequently used to examine later documentation in light of the requirements of this program. The documentation which was examined next consisted principally of procedures of varying types (for testing, operations, maintenance, etc.), as well as proposed UFSAR change packages and design documentation. Progressive examination of licensee documentation for implementation of its regulatory commitments was guided by prior insights into the licensee's regulatory commitment management program from review of those documents (see Table 1). At the end of the site visit, a discussion with licensee personnel was held regarding preliminary observations from the audit. The licensee provided additional insight into their program for regulatory commitment management and procedure development and explored possible responses to these observations, including creation of a new entry in their PIP. NRC resident inspector staff for Catawba 1 and 2 were also present at this meeting. After the site visit, further reviews of licensee documentation were conducted and the audit report was developed.

3.0 RESULTS AND OBSERVATIONS

3.1 Regulatory Commitment Management Program

The NRC staff reviewed NSD 214, Revision 8, issued June 14, 2010, against the guidelines of NEI 99-04. NSD 214, Section 214.6, "Commitment Management Process," delineates the regulatory commitment management process used by the licensee, and Appendix A, "Regulatory Commitment Change Process," describes the requirements for changing a regulatory commitment. Of particular interest, NSD 214, Section 214.6.5, "Regulatory Commitment Control Requirements," states:

1. Procedures, Nuclear System Directives, Site Directives, Section Manuals, Training Guides, or other implementing documents shall reference ongoing Regulatory Commitments. (See NSD 100 and NSD 703). As new implementing documents are written or changes incorporated into existing documents due to Regulatory Commitment items, a method of Regulatory Commitment control shall be used. The method used shall ensure that users are able to recognize information involving a Regulatory Commitment. The method used shall also ensure anyone making a future change shall be able to clearly recognize a Regulatory Commitment, and a reference to the Regulatory Commitment document identification shall be apparent.
2. The following are recommended methods; however, other methods may be used provided the method meets the criteria stated in (1) above:

- a. Preferred Method - At the location of the Regulatory Commitment information insert a special symbol (such as {}) with a number inside the symbol. The number shall correspond to the reference section of the procedure. The NRC source document (see Regulatory Commitment cross reference in PIP) shall be listed in the reference section of the procedure. The symbol (such as {}) should be placed in the left margin or at the end of the procedure step. For procedures not having a reference section, an enclosure may be used to list Regulatory Commitment references.
- b. Alternate Methods - (1) Use a footnote at the bottom of the affected page to reflect the Regulatory Commitment and the Regulatory Commitment document. (2) Place a note at the procedure step to indicate the Regulatory Commitment and NRC source document.

Section 214.6.5 of NSD 214, adequately implements, and provides more detailed guidance than, related provisions of NEI 99-04 which address control of regulatory commitments. It is noted that the preferred method of control for regulatory commitments provides more detail regarding how to handle regulatory commitments reflected in procedures than in other licensee documentation.

In general, NSD 214 follows closely the guidance of NEI 99-04 in that it sets forth the need for identifying, tracking, and reporting commitments, and it provides a mechanism for changing and controlling commitments.

3.2 Implementation of Regulatory Commitment Management

The licensee's performance in implementing commitments made to the NRC as part of past licensing actions/activities was examined. For commitments not yet fully implemented, the NRC staff assessed whether they were adequately progressing toward completion and/or whether they have been captured in an effective program for future implementation.

The licensee provided plant documentation used to track each individual commitment. The NRC staff found that the licensee's commitment tracking program, which is the PIP database, had adequately captured the regulatory commitments that were identified by the NRC staff as of interest prior to the audit. It is noted that Catawba 1 and 2 currently use NSD 208, Rev. 32, whereas different revisions were also in effect during earlier time periods addressed by the audit. Rev. 31 was effective from June 6, 2009, to July 29, 2010, and Rev. 30 was effective from September 25, 2008, to June 5, 2009. Changes in NSD 208 made over the time period of the audit are addressed when making observations regarding the licensee's implementation of regulatory commitment management if those changes had an impact on the observation. In discussions with the licensee, the largest impacts on the licensee's PIP were due to Rev. 32 of NSD 208 which provided for greater control over the process of closing out regulatory commitment follow-up actions.

During the audit, the licensee provided the status and a copy of the revised documents (plant procedures, UFSAR, TSs, etc.) for verification, if the required actions had already been completed. With limited time available during the site visit, and as Section 214.6.5 of NSD 214 provides some detail regarding the preferred method for control of regulatory commitments that

impact plant procedures, the review of the licensee's implementation of the regulatory commitment management program initially focused on this section. This involved determining whether affected procedures adequately cited regulatory commitments impacting those procedures (either in the reference section of the procedure or at the procedure step).

Initial sampling of plant procedures at Catawba 1 and 2 impacted by regulatory commitments indicated that only a minority of those procedures adequately implemented either the "Preferred Method" or the "Alternate Method" for control of regulatory commitments. Further sampling of plant procedures at Catawba 1 and 2 (including both greater number and variety of plant procedures) provided confirmatory indications that only a minority of procedures impacted by regulatory commitments were using the methods for controlling regulatory commitments outlined in Section 214.6.5 of NSD 214. In one of the more notable examples, a step in one plant procedure was deleted due to a commitment made in response to GL 2008-01. The later revision of the procedure (which no longer contained the removed step) provided no citation of the relevant regulatory commitment. It was not clear whether adequate measures were in place to prevent operations personnel from reinserting the affected step in the procedure in the future.

Although not an explicit requirement of NEI 99-04, as regulatory commitments are part of the licensing basis for the plant, it would appear that there would be a benefit to the licensee from performing a self-audit of the regulatory commitment management program, especially during the period since they adopted NEI 99-04. A self assessment by the licensee would appear to have had a high probability of identifying some of the observations made in this audit.

In summary, the NRC staff observed that:

- All the regulatory commitments selected for the audit were being tracked through the PIP database. All commitments for a particular amendment were tracked by one entry in the PIP database. Individual commitments were usually tracked under a unique action sequence number within an entry in the PIP database.
- Review of the plant documents (e.g. procedures, design bases documents, etc.) for the completed commitments indicated that the commitments selected for the review were implemented as committed.
- A minority of procedures impacted by regulatory commitments were controlling regulatory commitments using the methods outlined in NSD 214.

Table 1 summarizes the NRC staff's observations regarding the current status of the licensee commitments that were reviewed during the audit.

4.0 CONCLUSION

The NRC staff concludes that the licensee implements a program for managing regulatory commitments. Based on the above audit, the licensee (1) has an adequate program documentation for managing changes to regulatory commitments, (2) had implemented, or is tracking for future implementation, regulatory commitments, (3) had not been consistently using the methods for controlling regulatory commitments outlined in NSD-214, (4) would appear to benefit from a self assessment of its implementation of NSD-214.

Attachment: Table 1

Principal Contributor: J. Thompson

Date: September 12, 2011

TABLE 1
Summary of the Nuclear Regulatory Commission (NRC) Staff Audit of
Commitments Related to Catawba Nuclear Station, Units 1 and 2 (Catawba),
Licensing Actions and Licensing Activities
October 1, 2008 through November 30, 2010

Item No.	Licensee Submittals Containing Regulatory Commitments (ADAMS Acc. No.)	Commitments within the Scope of the Regulatory Commitment Audit (applicable Problem Investigation Plan (PIP) database references)	Summary of Audit Observations - Verification of Licensee's Implementation of Commitment
	NRC Issuance (ADAMS Acc. No.)		
1	<p>Letters dated 12/11/07 (ML073480445) and 12/18/08 (ML083570470) [revised the commitments]</p> <p>-----</p> <p>Catawba Amendments dated 12/30/08 (ML083460216)</p>	<p>2. Activities that degrade the availability of auxiliary feedwater, reactor coolant system (RCS) pressure relief, ATWS [anticipated transient without scram] mitigating system actuation circuitry (AMSAC), or turbine trip should not be scheduled when an RTB [reactor trip breaker] or a logic train is out of service.</p> <p>4. Activities that could degrade the operable train of RPS [reactor protection system] and ESFAS [engineered safety features actuation system] including master relays, slave relays, and analog channels should not be scheduled when an RTB or days a logic train is out of service.</p> <p>6. As part of the implementation of the proposed license amendment, to address a logic cabinet in maintenance; Duke will ensure solid state protection system (SSPS) train and engineered safety features actuation system (ESFAS) train unavailability is included in the Catawba and McGuire Maintenance Rule 10 CFR 50.65(a)(1), (a)(2), and (a)(4) program.</p> <p>(PIP C-09-00075)</p> <p>The amendment implementation time frame was within 90 days of issuance.</p>	<p>Observations identified by the audit.</p> <p>All commitments were addressed within the 90 day implementation period authorized by the NRC for the amendment.</p> <p>All the regulatory commitments selected for the audit were being tracked through the PIP database. Commitments made in association with a single license amendment were tracked together in a single PIP database entry. Individual commitments sometimes had discrete action sequence numbers within the single PIP database entry.</p> <p>Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.</p> <p>Methods to control changes made to procedures due to regulatory commitments (e.g. citation of the regulatory commitment in the procedure) were not evidenced in the majority of cases.</p>

Item No.	Licensee Submittals Containing Regulatory Commitments (ADAMS Acc. No.) <hr/> NRC Issuance (ADAMS Acc. No.)	Commitments within the Scope of the Regulatory Commitment Audit (applicable Problem Investigation Plan (PIP) database references)	Summary of Audit Observations - Verification of Licensee's Implementation of Commitment
2	<p>Letter dated 06/23/08 (ML082110285)</p> <hr/> <p>Catawba Amendments dated 4/2/09 (ML090910863)</p>	<p>2. Prior to actually utilizing the provisions afforded by the approved amendments, Catawba will have in place all required design, document, and process changes necessary to support these provisions. Catawba will implement the associated modifications on a staggered basis for each unit.</p> <p>3. Within one year following the implementation of the associated modification for the final unit, Catawba will submit a follow-up administrative license amendment request to delete the superseded TS [technical specification] and Bases requirements.</p> <p>(PIP C-09-01484)</p> <p>The amendment implementation time frame was within 60 days of issuance.</p>	<p>Observations identified by the audit.</p> <p>All commitments were addressed within the 60 day implementation period authorized by the NRC for the amendment.</p> <p>All the regulatory commitments selected for the audit were being tracked through the PIP database. Commitments made in association with a single license amendment were tracked together in a single PIP database entry. Individual commitments sometimes had discrete action sequence numbers within the single PIP database entry.</p> <p>Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.</p> <p>Methods to control changes made to procedures due to regulatory commitments (e.g. citation of the regulatory commitment in the procedure) were not evidenced in the majority of cases.</p>

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3	<p>Letters dated 9/2/08 (ML082490094)</p> <hr/> <p>Catawba Amendments dated 6/28/10 (ML092530088)</p>	<p>1. The approved amendments will be implemented within 60 days from the date of NRC approval. "Implemented" means that the approved amendments will have been placed into the control room copies of the TS. However, the provisions afforded by the approved amendments will not actually be utilized until such time that the associated plant modifications are in place.</p> <p>3. Within 180 days of the implementation of the associated modifications for the final unit, Catawba will submit a follow-up administrative license amendment request to delete the superseded TS and Bases requirements.</p> <p>(PIP C-10-03835)</p> <p>The amendment implementation time frame was within 60 days of issuance.</p>	<p>Observations identified by the audit.</p> <p>All commitments were addressed within the 60 day implementation period authorized by the NRC for the amendment.</p> <p>All the regulatory commitments selected for the audit were being tracked through the PIP database. Commitments made in association with a single license amendment were tracked together in a single PIP database entry. Individual commitments sometimes had discrete action sequence numbers within the single PIP database entry.</p> <p>Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.</p> <p>Methods to control changes made to procedures due to regulatory commitments (e.g. citation of the regulatory commitment in the procedure) were not evidenced in the majority of cases.</p>

Item No.	Licensee Submittals Containing Regulatory Commitments (ADAMS Acc. No.) <hr/> NRC Issuance (ADAMS Acc. No.)	Commitments within the Scope of the Regulatory Commitment Audit (applicable Problem Investigation Plan (PIP) database references)	Summary of Audit Observations - Verification of Licensee's Implementation of Commitment
4	<p>Letter dated 4/28/10 (ML101730388)</p> <hr/> <p>Catawba Amendment dated 9/27/10 (ML102640537)</p>	<p>1. Catawba commits to monitor for tube slippage as part of the SG [steam generator] tube inspection program. Applicable to Catawba Unit 2 End of Cycle 17 Refueling Outage and subsequent Cycle 18 operation.</p> <p>2. Catawba commits to perform a one-time verification of the tube expansion to locate any significant deviations in the distance from the top of the tubesheet to the bottom of the expansion transition (BET). If any deviations are found, the condition will be entered into the corrective action program and dispositioned. Additionally, Catawba commits to notify the NRC of significant deviations. Applicable to Catawba Unit 2 End of Cycle 17 Refueling Outage.</p> <p>(PIP C-10-06149)</p>	<p>Observations identified by the audit.</p> <p>All commitments were addressed prior to the Catawba Unit 2 End of Cycle 17 Refueling Outage as authorized by the NRC for the amendment.</p> <p>All the regulatory commitments selected for the audit were being tracked through the PIP database. Commitments made in association with a single license amendment were tracked together in a single PIP database entry. Individual commitments sometimes had discrete action sequence numbers within the single PIP database entry.</p> <p>Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.</p> <p>Methods to control changes made to procedures due to regulatory commitments (e.g. citation of the regulatory commitment in the procedure) were not evidenced in the majority of cases.</p>

Item No.	Licensee Submittals Containing Regulatory Commitments (ADAMS Acc. No.) <hr/> NRC Issuance (ADAMS Acc. No.)	Commitments within the Scope of the Regulatory Commitment Audit (applicable Problem Investigation Plan (PIP) database references)	Summary of Audit Observations - Verification of Licensee's Implementation of Commitment
5	GL 2008-01 dated 1/11/08 (ML072910759) <hr/> Response letter dated dated 10/13/08 (ML082900490)	<ol style="list-style-type: none"> 1. Monitor the status of the TSTF [technical specification task force] effort to provide revisions to NUREG-1431 Technical Specifications and their associated. Bases in regard to the periodic venting surveillance. Catawba will evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler, and submit a license amendment request based on this evaluation within 180 days following NRC approval of the TSTF. 2. Revise the UFSAR [updated final safety analysis report] in regard to gas accumulation and venting consistent with the guidance described in GL [generic letter] 2008-01. 3. Revise-SOMP [standard operations management procedure] for Safety Tagging and Configuration Control to include the Containment Spray and Residual Heat Removal systems. 4. Revise applicable procedures to keep the Chemical and Volume Control system pumps minimum flow aligned to the Volume Control Tank at all times. 5. Duke will monitor the results of the industry testing and analytical programs associated with allowable gas volume limits and gas transport for pumps and piping. Then Duke will evaluate the results to determine if additional changes to the applicable acceptance criteria are required. (PIP C-08-02439)	<p>Observations identified by the audit.</p> <p>All commitments were addressed within the requested time frame.</p> <p>All the regulatory commitments selected for the audit were being tracked through the PIP database. Commitments were tracked on an individual basis.</p> <p>Review of the plant documents for the completed commitments indicated that the commitments selected for the review were implemented as committed.</p> <p>Methods to control changes made to procedures due to regulatory commitments (e.g. citation of the regulatory commitment in the procedure) were not evidenced in some cases.</p>

J. Morris

- 2 -

If you have any questions, please call me at 301-415-1119.

Sincerely,

/RA/

Jon Thompson, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

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Audit Report

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