



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

August 22, 2012

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

**SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 - AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NO. ME6787)**

Dear Sir or Madam:

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC 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 Office of Nuclear Reactor Regulation has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the regulatory commitments are being effectively implemented.

An audit conducted of the Grand Gulf Nuclear Station, Unit 1 (GGNS) commitment management program was performed at the plant site during the period August 4-5, 2011. Based on the audit, the NRC staff concludes that Entergy Operations, Inc. (the licensee), has implemented NRC commitments made to the NRC on a timely basis, and has implemented an effective program for managing NRC commitment changes at GGNS. The details of the audit are set forth in the enclosed audit report.

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If you have any questions, please contact me at 301-415-1445.

Sincerely,

A handwritten signature in cursive script that reads "Alan Wang".

Alan Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosure:
As stated

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

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION (NRR)

REGULATORY COMMITMENTS MADE BY THE LICENSEE TO

THE U.S. NUCLEAR REGULATORY COMMISSION (NRC)

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION AND BACKGROUND

In U.S. Nuclear Regulatory Commission (NRC) Regulatory Issue Summary 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), 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 Office of Nuclear Reactor Regulation (NRR) has instructed its staff to perform an audit of licensees' commitment management programs once every 3 years to determine whether the licensees' programs are consistent with the industry guidance in NEI 99-04, and that the 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. NRR guidelines direct the NRR Project Manager to audit the licensee's commitment management program by assessing the adequacy of the licensee's implementation of a sample of commitments made to the NRC in past licensing actions (amendments, relief requests, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

An audit of the Grand Gulf Nuclear Station, Unit 1 (GGNS), commitment management program was performed at the plant during the period August 4-5, 2011, and discussed on August 5, 2011, with members of the Entergy Operations, Inc. (Entergy, the licensee), staff. The audit staff reviewed commitments made by Entergy since the previous audit on February 2008, which was documented in an audit report dated March 20, 2008 (ADAMS Accession No. ML080700209). The audit consisted of two major parts: (1) verification of the licensee's

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implementation of NRC commitments that have been completed, and (2) verification of the licensee's program for managing changes to NRC commitments.

2.1 Verification of Licensee's Implementation of NRC Commitments

The primary focus of this part of the audit is to confirm that the licensee has implemented commitments made to the NRC as part of past licensing actions/activities. For commitments not yet implemented, the NRC staff determines whether they have been captured in an effective program for future implementation.

2.1.1 Audit Scope

The audit addressed a sample of commitments made during the review period. The audit focused on regulatory commitments (as defined above) made in writing to the NRC as a result of past licensing actions (amendments, relief requests, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff performed a search in ADAMS for the licensee's submittals since the last audit and selected a representative sample for verification.

The audit excluded the following types of commitments that are internal to licensee processes:

- (1) Commitments made on the licensee's own initiative among internal organizational components.
- (2) Commitments that pertain to milestones of licensing actions/activities (e.g., respond to an NRC request for additional information by a certain date). Fulfillment of these commitments was indicated by the fact that the subject licensing action/activity was completed.
- (3) Commitments made as an internal reminder to take actions to comply with existing regulatory requirements such as regulations, Technical Specifications, and Updated Final Safety Analysis Reports. Fulfillment of these commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results

The attached table lists the commitments selected for this audit.

The licensee provided the documentation necessary to support the NRC staff's audit in each of the samples selected. The documents included summary sheets providing the status of the commitment and the appropriate backup documentation, as needed (i.e., plant procedures, incoming/outgoing records, and/or other plant documentation).

2.2 Verification of the Licensee's Program for Managing NRC Commitment Changes

The primary focus of this part of the audit is to confirm that the licensee has implemented those commitments made to the NRC as part of past licensing actions/activities. For commitments that had not yet been implemented, the NRC staff aimed to ascertain that they have been captured in an effective program for future implementation.

GGNS commitments are tracked in accordance with the licensee's Nuclear Management Manual Procedure EN-LI-110, Revision 4, "Commitment Management Program." The licensee enters commitments made to the NRC using a commitment tracking database called the Licensing Research System (LRS). According to the licensee, the majority of these commitments fall into the category of "One-time Actions." One-time action commitments are loaded into the database, tracked to implementation, and remain in the database for historical reference. Since the system was created, the licensee has entered more than 36,000 licensee-defined commitments. At the time of the audit, the licensee was tracking approximately 5,300 items in the LRS as regulatory commitments of which 77 were designated as "OPEN" actions items. There also approximately 900 items that are being tracked as "continuing compliance."

The NRC staff reviewed documentation generated by the licensee categorized as commitment changes, generic letter responses, relief requests, and amendments, to assess the implementation of the licensee's procedure EN-LI-110, including the status of their completion. After review of the commitments selected for the audit, the NRC staff concluded that the licensee's commitment tracking program had captured all of the regulatory commitments and that all of the commitments were met or were on schedule.

2.2.1 Change Control Procedure Verification

Changes to a commitment are reviewed by plant licensing management and by the organization that made the change to the commitment. Once a change occurs, the originating department should review the revision against the commitment report to determine if the change maintains satisfactory implementation of the commitment. Attachment 9.3 of procedure EN-LI-110, "Commitment Change Evaluation Process," is flowchart describing the change process. Procedure EN-LI-110, Attachment 9.4, "Commitment Change Evaluation Form (CCEF)," is used to document the evaluation of commitment changes. The NRC staff found that procedure EN-LI-110, Attachment 9.4, for handling commitment changes is consistent with the guidance in NEI 99-04.

2.2.2 Procedure Implementation Assessment

The NRC staff reviewed documentation generated by the licensee categorized as a commitment change in order to assess the effectiveness and implementation of such changes. The NRC staff found that the licensee had properly addressed each regulatory commitment change selected for this audit and that the licensee had implemented an effective program to manage commitment changes.

2.2.2.1 Commitment Changes Reportable to the NRC

The licensee indicated that it reports all commitment changes to the NRC; therefore, this section is not applicable. During this audit, the NRC staff reviewed several commitment change evaluation forms. The forms were complete and detailed and provided a sound basis for the change.

2.2.2.2 Traceability of Commitments

Although guidance in NEI 99-04 does not specifically address traceability of commitments; LIC-105 states, in part that

The PM should confirm that the licensee has integrated the commitment management system with other line organization functions to ensure traceability of a regulatory commitment following its initial implementation

In the licensee's procedure EN-LI-110, Section 5.8, "Implementing Changes to Documents that Contain Commitments," Subsection [6], the licensee provides instances when implementing document changes should be forwarded to Plant Licensing. Section 5.8[6] states, that

[t]he procedure implementing a commitment has undergone reformatting thereby relocating the section or paragraph that implements the commitment. The change originator should provide a marked-up commitment report showing the new or revised section(s) or paragraph(s).

When changing documents, the licensee's procedure directs that its staff should review the document being changed against the commitment report. If ownership for implementing a commitment transfers from one department to another, the person who originates the transfer must obtain approval and acceptance of ownership with the new department. Based on input from responsible departments, the plant licensing staff reviews and updates commitment implementation information and incorporates the data into the LRS database.

Based upon the licensee's implementation of the requirements of EN-LI-110, the NRC staff concluded that the licensee's commitments were traceable and personnel were knowledgeable in utilizing the commitment tracking system.

2.3 Audit Observations and Suggestions

As stated above, the licensee's procedure EN-LI-110 was found to be consistent with NEI 99-04. The NRC staff has made the following observations during the audit.

The NRC staff notes that the LRS is a mature system that has been in use since approximately 1995. The LRS is an Entergy corporate tracking system. The LRS tracks active and retired commitments. It is also used to track other commitments such as obligations by using different designations in the LRS so commitments can be sorted by type and due date. To help ensure regulatory commitments dates are met, the licensee stated that it generates a Licensing Status Report (LSR) at the beginning of each week for assigned licensing personnel and the personnel

look-ahead of upcoming actions in the LRS. Approximately every 2 to 3 weeks, a 90-day look-ahead report is generated to help ensure that regulatory commitments are not missed. In addition, special look-ahead reports are also generated, for example, for the extended power uprate (EPU) personnel to assure they are aware of the numerous regulatory commitments related to the EPU.

The NRC staff asked if periodic assessments are performed to evaluate for the compliance with the requirements of EN-LI-110. Entergy stated that it has not performed such "snapshot" assessments and noted that there is no such requirement to do so. Entergy stated it does conduct a periodic audit of the LRS electronic log for incoming and outgoing correspondence to ensure that incoming letters from the NRC and outgoing letters to the NRC have been reviewed and commitments added to the LRS database. Entergy noted that EN-LI-110, Revision 5, has added a new requirement to conduct a snapshot self-assessment of the regulatory commitment tracking process. The procedure has this snapshot self-assessment being performed prior to the NRC conducting the regulatory audit based on the list of commitments requested by the NRR Project Manager. The NRC staff believes that the above processes are important for maintenance of the regulatory commitment tracking process. The NRC staff does recommend that since the audits are only performed tri-annually that a more frequent self-assessment be performed, perhaps yearly. While NRC audits tend to look at compliance with regulatory commitments, the licensee's self-assessments might provide a more comprehensive assessment of the licensee's process.

3.0 CONCLUSION

The NRC staff concludes that, based on the above audit, (1) the licensee had implemented or is tracking for future implementation regulatory commitments, and (2) the licensee had implemented an effective program to manage regulatory commitment changes.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Rita Jackson
Christina Perino
Jeffery Seiter

Attachment:

Table 1, Audited: Written Commitments and Related Information

Principal Contributors: A. Wang

Date: August 22, 2012

TABLE 1
AUDITED: WRITTEN COMMITMENTS AND RELATED INFORMATION

Item No.	Grand Gulf Nuclear Station (GGNS) Submittal	U.S. Nuclear Regulatory Commission (NRC) TAC No.	GGNS Source Document	NRC Issuance	Summary of Commitment and Entergy Operations, Inc.'s (Entergy's, the Licensee's) Tracking Number	Licensee Implementation Status (Documents listed are in GGNS Database)
1	6/8/2011 7/11/2011	ME6436	GNRI-2011/00060	NRC Bulletin 2011-01: Mitigating Strategies dated 5/11/2011.	The bulletin required a 30- and 60-day response.	Completed via responses to the NRC dated 6/8/2011 (GNRO-2011/00041) and 7/11/2011 (GNRO-2011-00051).
2	2/15/2011	ME2644	GNRO-2011/00002	Request for additional information (RAI) dated 12/7/2010.	Entergy made a commitment to change Sections 4.3 and 4.4.3 of the GGNS Cyber Security Plan in accordance with the RAI responses as described in Attachment 1 of the letter dated 2/15/2011.	Closed via letter dated 4/4/2011 to the NRC.
3	2/25/2010	MD7831	GNRO-2010/00016	RAI dated 1/6/2010. Attachment	Per Generic Letter (GL) 2008-01, Entergy made a commitment to revise the procedures to establish and implement a shorter period of vent time before a condition report is prepared by 6/30/2010.	Closed by 6/10/2012, via Corrective Action CR-GGN-2009-06249.
4	8/27/2009	ME2474	GNRI-2010/00051	License Amendment No. 184 dated 3/25/2010.	Staff approval of license amendment request (LAR) to change the minimum critical power ratio safety limit to be implemented before operation of Cycle 18.	LBDCR 09037 implemented the LAR by 5/19/2010 and the Cycle 18 started on 5/27/2010.
5	2/20/2009	MD4675	GNRO-2009/00016	Issuance of safety evaluation (SE) and basis for denial of proposed technical specification (TS) change related to Condensate Storage Tank (CST) Level-low setpoint.	Entergy made the following regulatory commitment that within 6 months of the approval of the Technical Specification Task Force (TSTF): Entergy will follow the efforts of the TSTF-493 effort to resolve the instrument setpoint issue discussed in Regulatory Issue Summary (RIS)-2006-17. If the CST level-low setpoint is affected by the approved TSTF traveler, Entergy will submit a separate LAR to approve the generic change.	TSTF was issued on 5/11/2010. Closed via LAR dated 11/8/2010 (GNRO-2010/00067) to adopt generic TSTF-493 footnotes.

Item No.	Grand Gulf Nuclear Station (GGNS) Submittal	U.S. Nuclear Regulatory Commission (NRC) TAC No.	GGNS Source Document	NRC Issuance	Summary of Commitment and Entergy Operations, Inc.'s (Entergy's, the Licensee's) Tracking Number	Licensee Implementation Status (Documents listed are in GGNS Database)
6	6/30/2008	MD5913	GNRO-2008/00014	Issuance of Amendment No. 180 via letter dated 12/31/2008.	Entergy will implement TS and verify applicability of TSTF-475.	LBDCR 08002 verified applicability of TSTF and implemented the TS by 1/9/2009.
7	3/17/1997		CNRO-97/00004	GL 96-05, Periodic Verification of Design-Basis Capability of safety-related motor operated valves.	This is a commitment change evaluation to revise the GL 96-05 commitment (one time extension for valve 1E51F078.	Commitment Change Evaluation (CCE) Form CCE-2011-0001 provided the justification for this change to a commitment.
8	6/3/2003	MD4536	CNRO-03/00025	NRC Order EA-03-038	This commitment was relaxed per NRC letter dated 6/8/2009 and the commitment can be closed.	CCE Form CCE-2010-0003 provided the justification for this change to a commitment.
9	7/13/2006	MD1749	CNRO-06/00034	Request acceptance letter dated 7/18/2006.	Entergy will notify the manufacturer (as well as the U.S. nuclear industry) of any defects experienced during the use of the Mururoa V4F1R devices.	Ongoing and being implemented via Procedure EN-RP-503.
10	9/8/2010	ME4679	GNRO-2010/00056	Issuance of Amendment No. 191 via letter dated 7/18/2012.	Entergy committed to change Pa to the maximum calculated value per Appendix J.	This was implemented for the containment by Procedure 06-ME-1M10-0-0002 dated 8/6/2012 and for local leak rate test by procedure 17-S-05-1 dated 8/9/2012.
11	5/18/2010	ME2531	GNRO-2010/00035	Issuance of Amendment No. 188 via letter dated 3/28/2012.	Entergy will conduct the oscillation power range monitor (OPRM) monitoring period for 90 days following startup.	This OPRM monitoring is still ongoing as the outage ended on 5/24/2012.

If you have any questions, please contact me at 301-415-1445.

Sincerely,

/RA/

Alan Wang, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

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