



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

August 22, 2014

Mr. David A. Heacock
President and Chief Nuclear Officer
Virginia Electric and Power Company
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: SURRY POWER STATION, UNIT NOS. 1 AND 2 - AUDIT OF LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS. MF4567 AND
MF4568)

Dear Mr. Heacock:

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, 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.

On August 1, 2014, the NRC staff performed an audit of Virginia Electric and Power Company's (the licensee) commitment management program at Surry Power Station, Unit Nos. 1 and 2. The NRC staff concludes that based on the audit: (1) the licensee had implemented NRC commitments on a timely basis, and (2) the licensee had implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

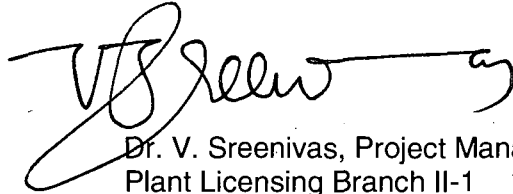
I appreciate the assistance and support provided by your licensing staff, particularly Mrs. Candee Lovett and Mr. Gary Miller.

D. Heacock

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If you have any questions, please contact me at 301-415-2597 or via e-mail at v.sreenivas@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Sreenivas', with a long horizontal flourish extending to the right.

Dr. V. Sreenivas, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure:
Audit Report

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION
REGULATORY COMMITMENTS MADE BY VIRGINIA ELECTRIC AND POWER COMPANY
SURRY POWER STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-280 AND 50-281

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, 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, reliefs, exemptions, etc.) and activities (bulletins, generic letters, etc.). The audit is to be performed every 3 years.

2.0 AUDIT PROCEDURE AND RESULTS

The regulatory commitment management audit was previously performed at Surry Power Station, Unit Nos. 1 and 2 (Surry 1 and 2) on August 9-10, 2011, covering the period of approximately 3 years. The current audit was performed at Surry 1 and 2 on August 1, 2014, verifying the regulatory commitments made by Virginia Electric and Power Company (the licensee) since the previous audit.

The audit consisted of two major parts: (1) verification of the licensee's implementation of NRC commitments that have been implemented and (2) verification of the licensee's program for managing changes to NRC commitments.

Enclosure

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, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Before the audit, the NRC staff searched ADAMS (Agencywide Documents Access and Management System) for the licensee's submittals since the last audit and selected a representative sample for verification.

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

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

2.1.2 Audit Results

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

The NRC staff reviewed documents generated by the licensee for the commitments listed in Table 1. After identification, most commitments were managed through the Surry Central Reporting System. The NRC staff found that the licensee had properly addressed each regulatory commitment selected for this audit. As a result of reviewing the licensee's information, as well as information from other sources, the NRC staff found no reason to differ from the licensee's reported status of the audited commitments. Thus, the NRC staff concludes that the procedure used by the licensee to manage commitments is appropriate and effective.

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

The primary focus of this part of the audit is to verify that the licensee has established administrative controls for modifying or deleting commitments made to the NRC. The NRC staff compared the licensee's process for controlling regulatory commitments to the guidelines in

NEI-99-04, which the NRC has found to be an acceptable guide for licensees to follow for 0-managing and changing commitments. The process used at North Anna Power Station, Unit Nos. 1 and 2, is contained in "Commitment Management," LI-AA-110, Revision 0. In general, Revision 0, follows the guidance of NEI-99-04; it sets forth the need for identifying, tracking, and reporting commitments, and it provides a mechanism for changing commitments. The audit reviewed a sample of commitment changes that included changes that were or will be reported to the NRC. The audit also verifies that the licensee's commitment management system includes a mechanism to ensure traceability of commitments following initial implementation. This ensures that licensee personnel are able to recognize that future proposed changes to the affected design features or operating practices require evaluation in accordance with the commitment change control process.

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

Candee Lovett, Licensing Engineer, Licensing Department, Surry Power Station, Surry, VA
Gary Miller, Nuclear Licensing and Operations Support, Glen Allen, VA

Principal Contributor: V. Sreenivas

Attachment: Summary of Audit Results

**Regulatory Commitments Made During the Period from March 1, 2011 through May 31, 2014
Surry Power Station, Units 1 and 2 (as of July 29, 2014)**

*(NOTE: This list does not include commitments that may have been included in
safeguards/security-related correspondence or responses to allegations.)*

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
10-304 [NOTE: Carried over from last NRC audit.]	6/8/2010	Upon NRC approval of the TSTF traveler, VEPCO will evaluate it for applicability to Surry 1 and 2. If a license amendment is determined to be necessary, VEPCO will submit a license amendment(s) within one year of NRC approval of the TSTF traveler.	Response to Request for Additional Information, GL 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal and Containment Spray Systems"	LC000233/ LA002519	COMPLETE TSTF 523 Rev. 2 noticed in 1/15/2014 Federal Register – evaluation of TSTF determined that TS SR rev/Basis add appropriate (Ref: LA005573)
12-208A	5/9/2012	Proposed alternative course of action for responding to Recommendation 9.3 information request: - Communications Request 1 – Provide an assessment of the current communications systems and equipment - Communications Request 2 – Describe interim actions - Communications Request 3 – Provide an	Beyond Design Basis Communication and Staffing actions - Recommendation 9.3	 Provided in SN 12-208F Att. 1 (LC001302/ LA005604) Provided in SN 12-208B Encl. 1 (LC001302/ LA005604) Provided in SN 12-208F Att. 2 (LC001302/	 COMPLETE COMPLETE COMPLETE

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
		implementation schedule		LA005604)	
		- Staffing Request 1 – Provide a Phase 1 assessment of the onsite and augmented staff		Provided in SN 13-244A Att. 1 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 1 – Provide a Phase 2 assessment of the onsite and augmented staff		LC000964/ LA005118 (U1) due 1/16/2015, LA005119 (U2) due 7/4/2015	OPEN
		- Staffing Request 2 – Provide a Phase 1 implementation schedule		Provided in SN 13-244A Atts. 1 and 2 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 2 – Provide a Phase 2 implementation schedule		LC000964/ LA005118 (U1) due 1/16/2015, LA005119 (U2) due 7/4/2015	OPEN

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
				Provided in SN 12-208B Encl. 2 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 3 – Identify how the augmented staff would be notified		Provided in SN 12-208B Encl. 2 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 4 – Identify the methods of access to the site		Provided in SN 12-208B Encl. 2 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 5 – Identify any interim actions that have been taken or planned		Provided in SN 13-244A Atts. 1 and 2 (LC001302/ LA005604)	COMPLETE
		- Staffing Request 6 – Identify changes		LC000964/ LA005118 (U1) due 1/16/2015, LA005119 (U2) due 7/4/2015	OPEN

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
		<p>associated with Phase 1 staffing assessment</p> <p>- Staffing Request 6 – Identify changes associated with Phase 2 staffing assessment</p>			
12-366	6/6/2012	Dominion will either correct the existing erratic Surry Unit 2 RCS standpipe level indication or replace the system with a reliable RCS level indication system during the next Unit 2 refueling outage.	Unit 2 RCS Standpipe Level Indication System – commitment related to 4/19/2012 regulatory conference	LC000978/LA003814	COMPLETE – DC SU-11-01216 replaced
12-420	7/10/2012	Before 6/15/2017, Dominion will submit ... a LBLOCA analysis that applies an NRC-approved ECCS Evaluation Model that includes the effects of fuel thermal conductivity degradation.	30-day 10 CFR 50.46 Report	LC000982/LA003832 due 6/15/2017	OPEN
12-706	11/13/2012	<p>1 - When confirmed silver content in EDG 1 or 3 EDG lube oil is ≥ 0.1ppm, the EDG ... will be declared EDG inoperable and its power packs replaced.</p> <p>2 - EDG 3 power packs will be replaced in January 2013 and the EDG 1 will be replaced in February 2013.</p>	Additional actions for Surry EDGs 1 and 3	LC001049/LA004138, LA004157, LA004158	COMPLETE – ER-SU-5910 R5 included inop declaration; EDGs 1 and 3 power packs replaced
12-208G	11/27/2012	Seal the Turbine Building side of electrical conduits from manhole 0-MH-SE-22 ... by January 31, 2013.	Beyond Design Basis Flooding – Recommendation 2.3	LC001054/LA004171	COMPLETE – conduit penetrations sealed

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
12-208H	11/27/2012 11/29/2012	Seismic walkdowns that could not be completed due to inaccessibility will be completed ... and report by August 31, 2014.	Beyond Design Basis Flooding – Recommendation 2.3	LC001054/ LA004159 (submit) due 8/31/2014, LA004160 (U1), LA004161 (U2) walkdowns complete	OPEN
12-766	1/14/2013	<p>1 – The welds ... will be examined using UT which is qualified for flaw detection and length sizing.</p> <p>2 - Indications connected to the inside surface with measured depths of < 50% of wall thickness will be dispositioned IAW ... the measured depth plus the RMS error ...</p> <p>3 – For indications connected to the inside surface with measured depths of $\geq 50\%$, the indication will be repaired or a flaw evaluation will be performed ... flaw evaluation shall be submitted to NRC for review and approval prior to reactor startup.</p>	Supplemental information re: RRs CMP-008 and CMP-010 – alternative examination requirements for RV nozzle to safe end butt welds	LC001056/ LA004327 (incorporate into Unit 1 program), LA004854 (incorporate into Unit 2 program)	COMPLETE - Incorporated into Units 1 and 2 ISI Programs
13-235	5/14/2013	Within 60 of PWROG developing “in-vessel” acceptance criteria, Dominion will develop a plan for demonstrating compliance with the PWROG program limits and communicate that plan to the NRC.	GSI-191 Closure Option	LC001145/ LA004766 (develop plan) due 2/16/2015, LA004767 (communicate plan) due 3/16/2015	OPEN

Letter Serial No.	Date	Commitment	Letter Subject	CR/CA or LC/LA Numbers	Status or Comments
13-435	08/12/2013	Dominion will use the definition in Section 5 of NEI 94-01 Revision 3-A for calculating the Type A leakage rate.	Proposed License Amendment Request for 15-year Type A Test Interval	LC001182/ LA005009 due 8/20/2014	OPEN

D. Heacock

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If you have any questions, please contact me at 301-415-2597 or via e-mail at v.sreenivas@nrc.gov.

Sincerely,

/RA/

Dr. V. Sreenivas, Project Manager
Plant Licensing Branch II-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-280 and 50-281

Enclosure:
Audit Report

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