



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

August 18, 2015

Mr. Mano Nazar
President and Chief Nuclear Officer
Nuclear Division
NextEra Energy
P.O. Box 14000
Juno Beach, FL 33408-0420

**SUBJECT: ST. LUCIE PLANT UNIT NOS. 1 AND 2 - AUDIT OF THE LICENSEE'S
MANAGEMENT OF REGULATORY COMMITMENTS (TAC NOS. MF5789
AND MF5790)**

Dear Mr. Nazar:

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 encouraged licensees to use the NEI 99-04 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.

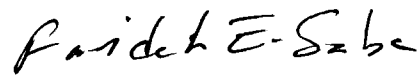
Every 3 years, the NRC staff audits a licensee's commitment management program in accordance with the NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." This office instruction provides the NRC staff and its stakeholders with guidance on managing regulatory commitments and ensures a common understanding of the handling of regulatory commitments made to the NRC staff by licensees for commercial nuclear power reactors.

The NRC staff performed an audit of Florida Power and Light's (the licensee's) commitment management program at St. Lucie during the period May 26 through 29, 2015. The audit reviewed commitments made since the previous regulatory commitment audit was completed for St. Lucie on November 16, 2012. During the audit the NRC staff communicated the following general recommendations to the licensee: (1) that the commitment completion date should reflect the date that the licensing engineer or manager has confirmed the associated action has been properly executed; (2) that items specifically identified as regulatory commitments in written correspondence with the NRC should be designated as such in the licensee's tracking system (*i.e.*, items should be tracked as regulatory commitments vs. obligations or licensee planned actions); and (3) that changes to regulatory commitment designations in the licensee's tracking system should be documented with equivalent action requests cross-referenced for ease in tracking. The licensee generated three condition reports to address the NRC recommendations.

In addition, the NRC auditors communicated with Region II and NRR technical staff to assess implementation of the licensee's commitment change procedure in relation to a commitment change justification. The NRC staff concluded that the licensee's change was properly noticed to the NRC consistent with NEI 99-04 guidance. The NRC staff concludes that, based on the audit: (1) the licensee has implemented NRC commitments on a timely basis; (2) the licensee has implemented an effective program for managing NRC regulatory commitment changes that is consistent with the guidance in NEI 99-04; and (3) all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews. Details of the audit are set forth in the enclosed report.

Should you have any questions regarding this letter, please contact Candace Pfefferkorn at 301-415-8395 or candace.pfefferkorn@nrc.gov, or me at 301-415-1447 or farideh.saba@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "Farideh E. Saba". The signature is written in a cursive, flowing style.

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-335 and 50-389

Enclosure: Audit Report

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UNITED STATES
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AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

LICENSEE'S MANAGEMENT OF REGULATORY COMMITMENTS

ST. LUCIE PLANT UNIT NOS. 1 AND 2

DOCKET NOS. 50-335 AND 50-389

1.0 INTRODUCTION AND BACKGROUND

The U.S. Nuclear Regulatory Commission (NRC) informed licensees in Regulatory Issue Summary (RIS) 2000-17, "Managing Regulatory Commitments Made by Power Reactor Licensees to the NRC Staff," dated September 21, 2000, that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes," contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 encouraged licensees to use the NEI 99-04 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. 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.

Every 3 years, the NRC staff audits a licensee's commitment management program in accordance with the NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-105, "Managing Regulatory Commitments Made by Licensees to the NRC." This office instruction provides the NRC staff and its stakeholders with guidance on managing regulatory commitments and ensures a common understanding of the handling of regulatory commitments made to the NRC staff by licensees for commercial nuclear power reactors.

NRR guidelines direct the NRR Project Manager to audit Florida Power and Light's (FPL's, 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 further includes evaluation of the licensee's commitment management procedures as compared to NEI 99-04 guidance, assessment of the licensee's commitment tracking database capabilities, appraisal of procedures for changing commitments (for both internal licensee management and communication with the NRC), and verification that no commitments were misapplied.

Enclosure

2.0 AUDIT PROCEDURE AND RESULTS

The audit consisted of three major parts: (1) verification of the licensee's implementation of NRC commitments that have been completed; (2) verification of the licensee's program for managing changes to NRC commitments; and (3) verification that all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

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. 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.

2.1.1 Audit Scope of Licensee's Implementation of NRC Commitments

The audit addressed commitments initiated during the review period from November 16, 2012, to May 29, 2015, and commitments that were in progress at the beginning of the audit period (November 16, 2012). The audit focused on regulatory commitments made in writing to the NRC as a result of past licensing actions (amendments, exemptions, etc.) or licensing activities (bulletins, generic letters, etc.). Commitments made in Licensee Event Reports or in response to Notices of Violation were included in the sample, but the review was limited to verification of restoration of compliance, not the specific methods used to restore compliance. Before the audit, the NRC staff searched the Agencywide Documents Access and Management System (ADAMS) for the regulatory commitments in the licensee's submittals and the NRC staff's safety evaluations during the audit period and compiled all relevant regulatory commitments. Additionally, the NRC staff compared the collection of commitments found in ADAMS to the list created by the licensee for the same review period to check for inconsistencies.

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 (UFSARs). Fulfillment of these

commitments was indicated by the licensee having taken timely action in accordance with the subject requirements.

2.1.2 Audit Results of Licensee's Implementation of NRC Commitments

Prior to the audit, the licensee provided NRC staff lists of regulatory commitments related to licensing actions from the Nuclear Asset Management System (NAMS), the licensee's system used for commitment management, as well as the pertinent regulatory commitment management procedures. The licensee's lists of regulatory commitments included: (1) all open commitments; (2) all commitments initiated since November 16, 2012; (3) all commitments closed within the audit window; and (4) all commitments that have been changed during the last 3 years that were reported to NRC. For each commitment listed, the licensee provided a NAMS tracking number, commitment description, FPL letter number, ADAMS accession number, commitment due date, commitment completion date, and implementing documents. Implementing documents for most of the closed commitments were provided to NRC staff prior to the audit via a file transfer protocol server; however, access to NAMS and additional supporting documentation such as commitment change evaluation forms was provided as requested by NRC staff during the on-site audit.

The licensee's commitment management program and tracking procedures are described in NextEra Energy Nuclear Fleet Administrative Procedure Nos. LI-AA-101-1005, Revision 2, "NRC Commitment Management," and No. LI-AA-101-1005-10000, Revision 1, "Commitment Tracking," respectively. The NRC staff found that LI-AA-101-1005, Revision 2, and LI-AA-101-1005-10000, Revision 1, provide guidance to the licensee that is consistent with the intent of NEI 99-04, and ensures that the licensee is appropriately implementing regulatory commitments.

The NAMS database is used for all nuclear plants in the NextEra fleet (FPL's parent company), including St. Lucie, and provides a central nexus for tracking plant actions (e.g., licensee planned actions, obligations, regulatory commitments, etc.). As described in LI-AA-101-1005-10000, Revision 1, for regulatory commitments, a licensing engineer reviews all correspondence incoming from and outgoing to the NRC for regulatory commitments and if applicable, enters the regulatory commitment(s) into NAMS. NAMS items are assigned an action request (AR) type and assignment type. For regulatory commitments, the designation is LIC and COMM for AR and assignment type, respectively. If the required action is already being tracked, the licensing engineer ensures the wording of the action accurately describes the action required to manage the regulatory commitment and adds cross references to the existing NAMS tracking item, as applicable for tracking purposes. The licensing engineer is also responsible for designating the responsible organization (RO) for implementing the action and reviewing the closure documentation for completeness and accuracy. It is the responsibility of the licensing engineer to either close the action or reject the completion documentation.

Procedure LI-AA-101-1005-10000, Revision 1, specifies that the RO assigned to complete the required action should upload closure documentation/objective evidence in NAMS by the agreed upon due date. Example acceptable closure documentation includes issued updated procedures indicating the procedure step addressing the commitment and notation in the reference section, plant modification closeout packages with acceptance by Operations, copies

of completed work package cover sheet, or copies of cover letters or references to the appropriate document tracking number.

During the audit NRC staff interviewed the St. Lucie personnel and reviewed documentation in NAMS for the regulatory commitments detailed in the enclosure in order to assess the implementation of each regulatory commitment, including the completion status. For the commitments selected for the audit, the NRC staff found that the licensee had adequately captured implementation documents in their system consistent with their Procedures LI-AA-101-1005, Revision 2, and No. LI-AA-101-1005-10000, Revision 1.

The NRC staff noticed that some of the commitment descriptions provided in the detailed summary in NAMS did not always capture the exact wording of the regulatory commitment or provide a clear link to the originating document. NAMS detailed description fields are fully searchable and therefore, a recommendation was made to the licensee to include the exact wording from written correspondence to enhance commitment tracking/comparison of NAMS content against ADAMS docketed source documents.

No open commitments were past the due date listed in NAMS. For completed commitments, the NRC staff confirmed implementation documents were uploaded into NAMS prior to the commitment due date listed or inferred from official source documentation. The NRC staff did not find any commitments that were completed past their due date; however, it was noted that the completion date listed was the date that the RO confirmed implementation in NAMS and not the licensing engineer or manager. Per LI-AA-101-1005, Revision 2, and No. LI-AA-101-1005-10000, Revision 1, the licensing engineer is responsible for reviewing the closure documentation for completeness and accuracy and for either closing the action or rejecting the completion documentation. In addition, NRC staff noted a few commitments that were completed past internal licensee deadlines listed in NAMS. NRC staff made a recommendation to the licensee to ensure that the commitment completion date reflect the date that the responsible licensing engineer or manager has confirmed the associated action has been properly executed.

NRC staff evaluation of NAMS due dates compared to that listed in source documentation in ADAMS revealed that several commitment due dates were not listed in NRC source documentation. While the due dates listed in NAMS were not inconsistent with the intent of the source document, the NRC staff informed the licensee that due dates should be listed for all commitments in the written correspondence to the NRC.

The NRC staff-generated commitment list based on surveying licensing-related source documents was compared to the lists provided by the licensee. Several regulatory commitments designated in source documentation were not included in lists provided by the licensee. NRC staff identified that this was because these regulatory commitments were not assigned the AR and assignment types, LIC and COMM, respectively. Discussion with the licensee revealed that some commitments were voluntarily elevated to assignment type obligation (OBLG) to ensure a high priority tracking and completion status. In addition, some regulatory commitments were designated LICA, for licensee planned actions. While no deficiencies were observed in the implementation of commitments listed under different ARs or assignment types, NRC staff recommended that items specifically identified as regulatory

commitments in written correspondence with the NRC should be designated as such in the licensee's tracking system and that changes to regulatory commitment designations in the licensee's tracking system should be documented with equivalent action requests cross-referenced for ease in tracking.

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 managing and changing commitments. 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. The process used at St. Lucie is contained in procedure LI-AA-101-1005, Revision 2, which is based on and implements the recommendations of NEI 99-04. While the audit scope included commitment changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC, only the latter was audited because no items fell into the category of the former.

2.2.1 Audit Results of the Licensee's Program for Managing NRC Commitment Changes

The NRC staff reviewed the licensee's procedure LI-AA-101-1005, Revision 2, against NEI 99-04 to ensure that guidance in this procedure is consistent with the intent of NEI 99-04, and that St. Lucie is appropriately implementing regulatory commitment changes, as well as tracking changes to the commitments.

The NRC staff found that LI-AA-101-1005, Revision 2, adequately conforms to the guidance and intent of NEI 99-04 for commitment tracking, the commitment change process, traceability of commitments, and reporting requirements. Regulatory commitment changes are processed and tracked by the responsible licensing engineer, or designee. The evaluation of any commitment changes is to be done by filling out the "Commitment Change Evaluation Summary Checklist, Form LI-AA-101-1005-F01, instructions for which can be found in Attachment 1 of LI-AA-101-1005, Revision 2. The NRC staff reviewed this form and found it consistent with the intent of the "Commitment Evaluation" form in NEI 99-04.

During the audit, the licensee provided documentation for all commitments in which a Commitment Change Evaluation Summary Checklist Form had been completed. While the audit scope included commitment changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC, only the latter was audited because no items fell into the category of the former (see 2012, 2013, and 2014 annual summaries of commitment changes implemented; ADAMS Accession Nos. ML13071A418, ML14071A018, and ML15065A236, respectively).

Of the two commitment changes evaluated, both were properly routed outside of the commitment change process after evaluation at Part I, Step 3 of the licensee's Commitment

Change Evaluation Summary Checklist Form. Specifically, the commitment changes were routed for change via another already codified process (e.g., 10 CFR 50.71e, 10 CFR 50.54, and 10 CFR 50.59).

The NRC staff also reviewed a commitment change justification notification letter (ADAMS Accession No. ML13025A208) that was submitted by the licensee during the audit review period. While the justification did not change the commitment, the original commitment change notification (ADAMS Accession No. ML003769058) was also reviewed. The licensee notified the NRC of both the commitment change and the commitment change justification; however, NRC approval of the change was not requested. If a commitment change is significant to safety, per NEI 99-04 (Figure A1), NRC approval is required. Subsequent to the audit, NRC regional and technical staff reviewed this commitment change to determine if the change was significant to safety. The staff concluded that the licensee's change did not compromise safety and, therefore, the commitment change was properly noticed to the NRC consistent with the NEI 99-04 guidance.

Based on the audit, the NRC staff found that the licensee is adequately implementing the procedures and instruction for managing regulatory commitments in the LI-AA-101-1005, Revision 2, which is consistent with the intent of NEI 99-04 guidelines pertaining to commitment changes.

2.3 Review to Identify Misapplied Commitments

The commitments reviewed for this audit were also evaluated to determine if they had been misapplied. A commitment is considered to be misapplied if the NRC staff relied on the action comprising the commitment in making a regulatory decision such as a finding of public health and safety in an NRC safety evaluation associated with a licensing action. Reliance on an action to support a regulatory decision must be elevated from regulatory commitment to a legal obligation (e.g., license condition, condition of a relief request, regulatory exemption limitation or condition). A commitment is also considered to have been misapplied if the commitment involves actions that were safety significant (i.e., commitments used to ensure safety).

Each of the commitments included in the audit were reviewed to determine if any had been misapplied. No commitments were found to be misapplied.

2.3.1 Review of Safety Evaluation Reports for Licensing Actions since the Last Audit to Determine if They Are Properly Captured as Commitments or Obligations

In addition to commitments included in the audit, all license amendment safety evaluations, exemptions, and relief request safety evaluations that have been issued for St. Lucie since the last audit were identified. These documents were evaluated to determine if they contained any misapplied commitments as described above. No commitments were found to be misapplied.

2.4 Audit Observations and Suggestions

During the audit the NRC staff communicated the following observations and suggestions to the licensee:

- (1) The NRC staff did not find any commitments that were completed past the due date listed in written correspondence with the NRC; however, it was noted that the completion date listed in NAMS was the date that the RO confirmed implementation in NAMS and not the licensing engineer or manager. Per LI-AA-101-1005, Revision 2, and No. LI-AA-101-1005-10000, Revision 1, the licensing engineer is responsible for reviewing the closure documentation for completeness and accuracy and for either closing the action or rejecting the completion documentation. The NRC staff suggested to the licensee that the commitment completion date should reflect the date that the licensing engineer or manager has confirmed the associated action has been properly executed.
- (2) The due dates listed in NAMS were consistent with the intent of the source correspondence document; however, some source documents did not include due dates. The NRC staff suggested to the licensee to clearly define due dates for all regulatory commitments contained in written correspondence with the NRC.
- (3) While some commitments contained the exact wording of the commitment in the detailed description field in NAMS, most commitments did not contain exact wording and/or reference the ADAMS Accession No. in addition to the licensee's letter number. A suggestion was made to the licensee to include the exact wording from written correspondence to enhance commitment tracking as well as comparison of NAMS content against ADAMS docketed source documents.
- (4) Several items were not included in the licensee's list of commitments provided to the NRC staff prior to the audit. The NRC staff suggested that items specifically identified as regulatory commitments in written correspondence with the NRC should be designated as such in NAMS and that changes to regulatory commitment designations should be documented with equivalent action requests cross-referenced for ease in tracking.
- (5) The NRC staff observed that some incoming licensee documentation did not contain a separate section or attachment that clearly identified regulatory commitments. Therefore, the NRC suggested that all correspondence should clearly state that commitments are contained (or not contained) in the documents and include a separate section or attachment with the regulatory commitments in a consistent table format for clarity and ease of tracking.

The licensee's staff acknowledged the NRC staff observations and recommendations and created the following ARs:

- AR No: 02050236, Subject: NRC Observation: Regulatory Commitment Completion Dates, Due Date - Aug 20, 2015
- - Description: "During the 2015 NRC audit of regulatory commitments at St. Lucie, the NRC auditors observed that the St. Lucie had a delayed review of commitment completions by having the LIC MGR as the 'owed to' for the related AR rather than having a more timely review, such as with the assignment routing

list. The delay could be an undesired condition if the AR closure reviews identify assignment closure gaps.”

- Immediate Actions: “The Licensing Manager was added as an approver to each open PSL COMM assignment. This will ensure a timely licensing manager review for each PSL [St. Lucie] COMM assignment.”
- AR No. 02050248, Subject: NRC Observation: NAMS Updates to Regulatory Commitment Assignment, Due Date – Aug 20, 2015
 - Description: “During the 2015 NRC audit of regulatory commitments at St. Lucie, the NRC auditors observed that NAMS updates to regulatory commitment assignments do not always include the basis for the update. For example, if Licensing identifies that a regulatory commitment (COMM) assignment should be tracked as an obligation (OBLG) assignment; the change was often just made without additional in-progress notes. It would be appropriate to include in-progress notes for this type of change.”
 - Immediate Actions: This feedback was received by the PSL Licensing commitment management program owner and shared as coaching with the PSL Licensing staff.”
- AR No: 02050905, Subject: NRC Observation: Assignment Types for Regulatory Commitments
 - Description: “NRC Observation: Assignment types for regulatory commitments during the 2015 NRC audit of St. Lucie regulatory commitments, the NRC auditors identified some regulatory commitments that were tracked as OBLG and LICA assignment types. The auditors recommended that the assignment types should be COMM assignment types.”
 - Immediate Actions: “The following assignments were updated in NAMS:
01746246-19 Changed from OBLG to COMM on 5/28/15
01872955-06 Changed from LICA to COMM on 5/28/15
01872955-07 Changed from LICA to COMM on 5/28/15
These changes do not affect how the actions will be implemented and will allow easier retrieval of the assignments during future commitment audits.”

3.0 CONCLUSION

The NRC staff concludes that, based on the audit: (1) the licensee has implemented NRC commitments on a timely basis; (2) the licensee has implemented an effective program for managing NRC regulatory commitment changes that is consistent with the guidance in NEI 99-04; and (3) all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

Richard Sciscente, Principal Engineer, St. Lucie Licensing
Atanya Lewis, Principal Engineer, Nuclear Fleet Support Services
Ken Frehafer, Principal Engineer, St. Lucie Licensing

Principal Contributors: Candace M. Pfefferkorn
Farideh E. Saba

Date: August 18, 2015

Attachment: Summary of Audit Results

Summary of Regulatory Commitment Audit Results

St. Lucie, Units 1 and 2

Audit Period: November 15, 2012 – May 29, 2015

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
1	ML13057A108 02/13/13 (ML13150A33 7 - Issued Amendment) 06/18/13	L-2013-048 1731002-02	St. Lucie will commit to provide a description of the averaging method used in the Technical Specifications Bases Section. The proposed addition to the Technical Specification Bases document is shown in Attachment 5 to this enclosure. In addition, St. Lucie proposes enhancing the Table and text in the Technical Specification Surveillance Requirements (Unit 1 TS SR 4.8.2.3.2.c.3 and Unit 2 TS SR 4.8.2.1.c.3) in the proposed License Amendment request to describe the definition of 50 μ Q per cell "average" value, as shown below and in Attachments 3 and 4:	09/16/13	09/16/13 In Amendment Safety Evaluation (SE) dated 06/18/13 revised bases pages were submitted but referred to the Technical Specifications (TS) Bases Control Program	TS Bases updated on 09/12/13	Closed	This commitment was correctly implemented via the TS Bases Program. The commitment was generated through the request for information (RAI) process in response to a license amendment request (LAR). This commitment was not specifically notated as such in a separate section of the source documentation. The commitment was also not stated verbatim from the source document in the detailed description in NAMS. This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as obligation, OBLG).
2	ML14077A265 02/26/14	L-2013-233 1946199-10	FPL will establish the Technical Specification Bases for LCO 3.0.4 and SR 4.0.4 as adopted with this license amendment request.	04/28/15	04/24/15	Unit 1 and Unit 2 TS Bases	Closed	This commitment was correctly implemented via TS Bases Program. This commitment was not stated verbatim from the source document in the detailed

Attachment

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
								description in NAMS. This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).
3	ML13025A208 01/10/13 ML003769058 11/09/00	L-2013-005 L-2000-215	Commitment regarding Generic Letter (GL) 89-13 The Commitment changed the routine inspection interval for the Units 1 and 2 intake well and safety-related intake cooling water (ICW) piping from 100% every refueling outage to a single train inspection every refueling outage. This change will result in 100% inspection of the intake well and ICW piping every other refueling outage for each unit.	Each outage	Each outage	Inspection Procedures	Ongoing	In 2013, the licensee updated a commitment change justification for a commitment change executed in 2000 associated with GL 89-13. The updated commitment change justification did not change the commitment. NRC staff reviewed the original commitment change requested by the licensee in 2000, but were unable to review the original commitment change evaluation summary form because the commitment predated licensee's commitment change procedures. To ensure this commitment change was executed in accordance with NEI 99-04, NRC regional and technical staff reviewed the commitment for safety significance. NRC staff concluded that this commitment change was executed by the licensee in accordance with NEI 99-04.

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
4	ML14329A205 11/20/14	L-2014-345 01746246-18	For St. Lucie Unit 1, all required procedures, guidance, training, and acquisition, staging, or installing of equipment necessary to implement the Diverse and Flexible Mitigation Capability (FLEX) strategies will be complete prior to the conclusion of SL1-26 spring refueling outage.	(End of outage) 4/25/15	4/20/15	FPL L-2015-143 Licensee compliance matrix for the umbrella modification verified complete.	Closed	This commitment was not stated verbatim from the source document in the detailed description in NAMS. This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).
5	ML14329A205 11/20/14	L-2014-345 01746246-19	For St. Lucie Unit 2, all required procedures, guidance, training, and acquisition, staging, or installing of equipment necessary to implement the FLEX strategies will be complete prior to the conclusion of SL2-22 fall refueling outage.	(End of outage) 10/09/15			Open	This commitment was not stated verbatim from the source document in the detailed description in NAMS. This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).
6	ML12307A116 10/31/12	L-2012-377 1746245-07	Existing on-site communications systems improvements and their required normal and/or backup power supplies - Develop procedural guidance to recharge portable radio batteries. - Develop procedural guidance to periodically test portable generators. - Additional portable radios will be stored in the Technical Support Center	04/30/13	04/30/13	Licensee Summary: 18 portable radios in smart chargers have been moved to the Computer room in the TSC complex. Operation of the Interim FLEX 6kW Diesel Generator, 0-NOP-99.08 was approved on 4/22/13 and has instructions for the operations of 6 KW Diesel and charging batteries. EC 278700 Design Change Package NRC 10CFR50.54(F) – Near Term Task Force Rec 9.3 –	Closed	This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
						Emergency Preparedness – Communications Charging Equipment Storage		
7	ML12307A116 10/31/12	L-2012-377 1746245-08	Off-site communications systems improvements and their required normal and/or backup power supplies; * Acquire Government Emergency Telecommunications Service (GETS) and the Wireless Priority Service (WPS) cards for communication links as appropriate. * Develop procedural guidance to recharge portable satellite phone batteries. * Develop procedural guidance to periodically test portable generators. * Additional portable satellite phones will be stored in the Technical Support Center and the Emergency Operations Facility. Off-site communications	04/30/13	04/30/13	Licensee Summary: 5 additional portable satellite phones have been placed in the TSC and 4 in the EOF. Credit was taken for the diesel at the EOF. A portable diesel is being maintained available in Vent Stack Radiation Monitor Room that meets the storage requirements of 9.3 see EC 278700. Instructions for the operation of the diesel and charging batteries is provided in 0-NOP-99.08 Operation of the Interim Flex 6KW Diesel Generator. GETS numbers 97855736 and 22808437 have been assigned to PSL for GETS capability. There currently are no assigned cell phones to key ERO communicators at St. Lucie that require WPS.	Closed	This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).
8	ML12307A116 10/31/12	L-2012-377 1746245-09	Off-site communications systems improvements * Install satellite phone fixed antennas and docking stations in Emergency Response Facilities.	04/05/15	02/27/15	EC279287 is complete. This installed a docking station with an external antenna in Unit 2 Control Room and 5 docking stations with external antennas in the TSC/Control Room envelope. 4 docking stations with external antennas were installed at the EOF.	Closed	This commitment was not listed as part of the licensee's list of commitments prior to the audit because it was not tracked in NAMS under the LIC-COMM designation (tracked as OBLG).

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
9	ML082900487 10/14/08	L-2008-221 0554250-26	FPL is continuing to support the industry and NEI Gas Accumulation Management Team activities regarding the resolution of generic TS changes via the Technical Specification Task Force (TSTF) traveler process. FPL will evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler following NRC approval and the Consolidated Line Item Improvement Process (CLIIP) Notice of Availability of the TSTF traveler in the Federal Register. Based upon the results of the evaluation, an appropriate license amendment request will be filed with the NRC within 180 days following NRC approval of the TSTF. The appropriate Bases changes associated with the potential Technical Specification will also be made.	8/29/14	07/16/14	L-2014-029 ML14198A074	Closed	There were two commitments included in L-2008-221. Only one is included in this audit because the other commitment was closed on 12/15/09 which is outside this audit window. This commitment was not stated verbatim from the source document in the detailed description in NAMS.
10	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1711901-01	EPU IST Changes 1. Update the Inservice Testing Program to reflect changes to plant pumps and valves under EPU conditions.	11/14/12	11/18/12	ADM-29.01A	Closed	Source documentation did not specify an exact completion date. The licensee did not complete the action by the due date listed in NAMS; however, the licensee explained this was an internally controlled due date and therefore the commitment was still completed in a time frame consistent with the source documentation. A link to the implementing

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
								documentation was not included in NAMS.
11	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1711901-02	EPU Operator Training 2. Provide operator training to account for increased EPU power level and resultant plant changes.	11/12/12	11/15/12	PSL OPS 0502521 SL1-24 Procedures Rev 00 PSL OPS 0508521 Rev 00 PSL OPS 0702521A R02 PSL OPS 0702521B R01 PSL OPS 0702521C R00 PSL OPS 0702521D R00 PSL OPS 0702521E R00 PSL OPS 0702521F R00 PSL OPS 0702522 R01	Closed	Source documentation did not specify an exact completion date. The licensee did not complete the action by the due date listed in NAMS; however, the licensee explained this was an internally controlled due date and therefore the commitment was still completed in a time frame consistent with the source documentation.
12	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1711901-03	EPU Leading Edge Flowmeter Mod 3. Implement modification(s) to install a leading edge flow meter (LEFM) as described in LR Section 2.4.4, Measurement Uncertainty Recapture Power Uprate, and update UFSAR Section 13.7, Licensee-Controlled Technical Specification Requirements, to include Limiting Conditions for Operation (LCO) and Action Statements for the LEFM system.	1/11/13	01/10/13	EC 249978 EC 249979	Closed	Source documentation did not specify an exact completion date. The implementing documents in NAMS did not include the associated work orders.
13	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1711901-04	EPU RDF RTD Mod 4. Implement modification(s) to replace RDF Corporation resistance temperature detectors as described in LR Section 2.3.1, Environmental Qualification of Electrical Equipment.	11/13/12	11/02/12	EC 249988	Closed	Source documentation did not specify an exact completion date. The implementing documents were specified in NAMS but not cross linked.
14	ML110730116 ML110730310 (Attachment 7)	L-2011-021 L-2011-021 (Attachment 7)	EPU AC Bus Mods 5. Implement modification(s) to the AC electrical busses as	12/31/12	11/30/12	EC 249965	Closed	Source documentation did not specify an exact completion date. The implementing

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
	2/25/11	1711901-05	described in LR Section 2.3.3, AC Onsite Power System.					documents were specified in NAMS but not cross linked.
15	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1711901-06	EPU Pipe Support Mods 6. Implement modification(s) to pipe supports for systems impacted by loads due to EPU conditions, as described in LR Section 2.2.2.2, Balance of Plant Piping, Components, and Supports.	12/31/12	11/30/12	EC 249987 EC 249992 EC 249986	Closed	Source documentation did not specify an exact completion date. This commitment is listed twice in NAMS (two different AR-AS nos.)
	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7) 1653220-06	EPU Pipe Support Mods 6. Implement modification(s) to pipe supports for systems impacted by loads due to EPU conditions, as described in LR Section 2.2.2.2, Balance of Plant Piping, Components, and Supports.	12/31/12	11/30/12	EC 249987	Closed	Source documentation did not specify an exact completion date. This commitment is listed twice in NAMS (two different AR-AS nos.)
16	ML110730116 ML110730310 (Attachment 7) 02-25-11 ML11364A043 12-27-11	L-2011-021 L-2011-021 (Attachment 7) 1711901-07 L-2011-524	EPU Metamic insert 7. Metamic insert surveillance program as described in LR Section 2.8.6.2, Spent Fuel Storage, and update the UFSAR to include the program requirements L-2011-524 revised this commitment: As described in EPU LAR Attachment 5, Section 2.8.6.2.2.6, the visual inspections will be at 4, 8, 12, 20, and 30 years after initial installation and the physical measurement inspections and neutron attenuation testing will be at 4, 12, 20 and 30 year intervals.... In accordance with the	11/30/12	11/30/12	OSP 67.01		Source documentation for these commitments did not specify an exact completion date. This commitment was revised by L-2011-524 (licensee RAI response) prior to the granting of LAR (L-2011-021). Associated commitments were tracked using various designations in NAMS (see below).

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
			manufacturer's recommendations... FPL will perform physical measurement inspections on coupons, not on the Metamic TM inserts as previously committed.					
		1751336-10	UNIT 2: Record Metamic CT installation date and SFP location		06/25/12	OSP 67.01	Closed	These commitments were not listed as part of the licensee's list of commitments provided to the NRC prior to the audit because they were tracked in NAMS under a RWA designation. Commitment descriptions summarized from licensee database.
		1751336-16	UNIT 2: Record initial fuel configuration surrounding CT		06/25/12	OSP 67.01	Closed	
		1751336-17	Unit 2: Record fuel configuration surrounding CT after U2C21.		09/03/12	OSP 67.01	Closed	
		1751336-18	UNIT 2: Record fuel configuration surrounding CT after U2C21	4/30/14	04/08/14	OSP 67.01 AR 1751336-18.pdf	Closed	This commitment was listed as part of the licensee's list of commitments provided prior to the audit. This was tracked in NAMS under COMM designation.
		1751336-19	UNIT 2: Record fuel configuration surrounding CT after U2C22	11/30/15		OSP 67.01	Open	These commitments were not listed as part of the licensee's list of commitments provided to the NRC prior to the audit because they were tracked in NAMS under a OBLG designation. Commitment descriptions summarized from licensee database. The licensee changed these assignments from OBLG to COMM after NRC on-site audit.
		1751336-11	UNIT 2: 4 Year Metamic Surveillance Interval	6/30/2016		OSP 67.01	Open	
		1751336-12	UNIT 2: 8 Year Metamic Surveillance Interval	6/30/2020		OSP 67.01	Open	
		1751336-13	UNIT 2: 12 Year Metamic Surveillance Interval	6/30/2024		OSP 67.01	Open	
		1751336-14	UNIT 2: 20 Year Metamic Surveillance Interval	6/30/2032		OSP 67.01	Open	
		1751336-15	UNIT 2: 30 Year Metamic Surveillance Interval	6/30/2042		OSP 67.01	Open	
17	ML110730116 ML110730310 (Attachment 7) 02/25/11	L-2011-021 L-2011-021 (Attachment 7)	EPU CR AC Mods 8. Implement modifications to the control room air conditioning system as described in LR	12/31/12	11/30/12	EC 249981 WO 40114036-58 WO 40114036-60	Closed	Source documentation did not specify an exact completion date.

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
		1711901-08	Section 2.5.4.3, Reactor Auxiliary Cooling Water Systems, to accommodate higher component cooling water temperatures under EPU conditions.					
18	ML12235A463 09/24/12	L-2011-453 01711901-10	Complete the modifications to remove the wave traps prior to operating St. Lucie 2 at its EPU ratings as discussed in Section 2.3.2 Offsite Power System – Switchyard Connections.	10/31/12	03/01/12	The wave traps were removed as planned during SL1-24. Work orders are not used for switchyard work. The NAMS assignment completion notes state that the removal of the wave traps was confirmed by TSO personnel on 02/07/12.	Closed	This commitment is listed in the issued amendment safety evaluation, but is not listed in original license LAR (Commitment #10 - 17 above).
19	ML12235A463 09/24/12 ML11362A382 12/20/2011	L-2011-453 L-2011-556 1851885-06	<u>Unit 2:</u> Adopt MRP-227-A in place of the existing RVI inspection program.	07/31/13	07/22/13	ADM-17.29, Rev. 1	Closed	This commitment is listed in ML12235A463, but is not listed in original licensee LAR. This commitment aligns with the licensee response to RAI CVIB-1 in ML11362A382.
20	ML11354A234 12/14/11	L-2011-545 1711901-11	L-2011-545 contains a commitment to perform testing of the turbine steam admission valves and overspeed trip system as noted below: <ul style="list-style-type: none"> • Testing of the speed probes will be performed off-line at refueling intervals. • Testing of the speed detector modules will be performed off-line at refueling intervals. • Testing of the testable dump manifolds will be performed on-line at quarterly intervals. • Testing of the turbine control system controller overspeed logic will be performed at refueling intervals. 	12/31/12	01/07/13	2-PMI-22.38 2-OSP-22.01 2-OSP-22.03 2-OSP-22.04	Closed	Commitment for Unit 2 EPU based on RAI for Unit 1 EPU. The commitment was not stated verbatim from the source document in the detailed description in NAMS. The commitment completion date was later than the due date.

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
			• Testing of the steam admission valves will occur at 6-month intervals.					
21	ML12340A352 (12Q4116-RPT-001 Rev. 0) 11/27/12	L-2012-427 1746202-07	Complete U1 deferred seismic walkdowns (L-2012-427) Unit 1 Seismic Report transmitted via L-2012-427. Appendix E of the Unit 1 Seismic Report (12Q4116-RPT-001 Rev. 0) identified equipment that was inaccessible for inspection during the walkdown. Table E-1 identified equipment that is located within containment and could not be accessed because the unit was at power during the time of the walkdown. Table E-2 identifies electrical cabinets that could not be opened due to electrical safety and plant operation hazard. 12Q4116-RPT-001 Rev. 0 Appendix E continued and provided the following licensee planned action: A plant Corrective Action has been issued to plan for and implement additional cabinet internal inspections.	09/30/14	09/26/14	12Q4116-RPT-001, Rev. 1 WO40330038 -01 WO40330036-01	Closed	NAMS lists implementation documents but they are not linked in the system. Page 316 of ML12340A352 states that, "the plans for inspection of inaccessible equipment are to inspect the items during the first available equipment or refueling outage, when they can be safely accessed. The next schedule refueling outage is Fall 2013." The due date listed in NAMS was 09/30/14. The licensee provided documentation at the on-site audit that stated for cases where items were inaccessible during the reporting period, an updated submittal report should be submitted later. Therefore, the licensee was still in compliance with ML12340A352.
22	ML12340A353 (12Q4116-R-002 Rev. 0) 11/27/12	L-2012-427 1746202-08	Complete U2 deferred seismic walkdowns (L-2012-427) Unit 2 Seismic Report transmitted via L-2012-427. Appendix E of the Unit 2 Seismic Report (12Q4116-R-002 Rev. 0) identified equipment that was inaccessible for inspection during the walkdown. Table E-1 identifies equipment that is	09/30/14	09/26/14	12Q4116-R-002, Rev.1	Closed	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
			located within containment and could not be accessed because the unit was at power during the time of the walkdown. Table E-2 identifies electrical cabinets that could not be opened due to electrical safety and plant operation hazard. 12Q4116-RPT-002 Rev. 0 Appendix E continued and provided the following licensee planned action: A plant Corrective Action has been issued to plan for and implement additional cabinet internal inspections.					
23	ML13121A462 04/30/13	L-2013-147 1746246-07	Develop and implement a process to integrate the expanded response capability into existing augmented ERO (i.e., put in place the ability to transition to unit-specific performance). Formalize this process via an EP procedure or similar guideline. (During performance of the NEI 12-01 Phase 2 assessment, the process will be re-assessed and revised as necessary). a. This process is expected to provide flexibility to the Emergency Director and TSC Manager in establishing the expanded response capability based on site priorities at the time of the event. b. The process will include implementing strategy and decisionmaking criteria for initiating the actions necessary to	03/31/14	03/31/14	EPIP-04 EPIP-06	Closed	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
			<p>ensure timely performance of expanded response functions.</p> <p>c. The process will require the Emergency Director and TSC Supervisor to take into account the functions and recommended staffing considerations listed in NEI 12-01 Table 3.1 as they establish the "expanded response capability."</p> <p>d. Provide training and or briefings, as appropriate, to ERO members prior to implementing this process.</p> <p>e. Include provisions for a minimum number of available RPTs following a BDBEE, to support performance of assigned emergency plan functions and the expanded response capability. Provide the equation in Section 3.5.1 of NEI 12-01 to the ERO personnel to use as a reference in determining the required number of on-site RPTs.</p>					
24	ML13121A462 04/30/13	L-2013-147 1746246-08	Identify additional work areas necessary for the performance of expanded response functions	03/31/14	03/31/14	EPIP-04 EPIP-06	Closed	
25	ML13121A462 04/30/13	L-2013-147 1746246-09	Identify area for the ERO to assemble to following an event in which normal plant access to the plant is not available. This would include any required letters of agreement for the use of this area.	12/20/13	12/12/13	COMM1746246-09 completion notes	Closed	
26	ML13121A462 04/30/13	L-2013-147 1746246-10	Provide training to the ERO for response to beyond designed based accidents where alternate assembly staging may be required	12/20/13	12/17/13	ERO info sharing _3.docx	Closed	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
27	ML13121A462 04/30/13	L-2013-147 1746246-11	Evaluate additional resources that may be require for beyond design based accidents and include in the applicable procedures	03/31/14	03/31/14	EPIP-06	Closed	
28	ML13302A933 10/16/13	L-2013-302 1746246-12	FPL commits to implementing version 2.0 of the full multiunit/ multi-source dose assessment computer model RASCAL Unified Rascal Interface (URI) by December 31, 2014.	12/31/14	12/22/14	EPIP-14	Closed	
29	ML13149A269 05/15/13	L-2013-168 1872955-01	Unit 1: FPL will schedule a meeting with NRC to discuss this proposed resolution path.	08/1/13	07/26/13	COMM1872955-01 completion notes	Closed	Same FPL Tracking Number assigned for #29 and #30
30	ML13149A269 05/15/13	L-2013-168 1872955-01	Unit 2: FPL will schedule a meeting with NRC to discuss this proposed resolution path.	08/1/13	07/26/13	COMM1872955-01 completion notes	Closed	Same FPL Tracking Number assigned for #29 and #30
31	ML13149A269 05/15/13	L-2013-168 1872955-02	Unit 1: FPL will provide a preliminary schedule for completion of the risk-informed resolution path activities.	09/30/13	09/30/13	L-2013-281 ML13283A003	Closed	Same FPL Tracking Number assigned for #31 and #32
32	ML13149A269 05/15/13	L-2013-168 1872955-02	Unit 2: FPL will provide a preliminary schedule for completion of the risk-informed resolution path activities.	09/30/13	09/30/13	L-2013-281 ML13283A003	Closed	Same FPL Tracking Number assigned for #31 and #32
33	ML13149A269 05/15/13	L-2013-168 1872955-04	Unit 1: FPL will complete measurements for insulation replacement.	12/31/13	12/19/13	N/A	Closed	Completion notes in NAMS should have included more detail to document why these commitments were closed. Discussion with the licensee during the on-site audit revealed that these commitments did not have associated implementation documentation because no
34	ML13149A269 05/15/13	L-2013-168 1872955-04	Unit 2: FPL will complete measurements for insulation replacement.	05/31/14	05/29/14	N/A	Closed	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
								action was necessary to close (L-2013-281, ML13283A003).
35	ML13149A269 05/15/13	L-2013-168 01872955-05	Unit 1: FPL will complete any necessary insulation replacements or remediation, or other identified plant changes.	12/31/19			Open	
36	ML13149A269 05/15/13	L-2013-168 01872955-09	Unit 2: FPL will complete any necessary insulation replacements or remediation, or other identified plant changes.	03/31/20			Open	
37	ML13149A269 05/15/13	L-2013-168 01872955-06	Unit 1: FPL will submit a final updated supplemental response to support closure of GL 2004-02	01/31/17			Open	Source documentation lists completion for these commitments as within 6 months of the receipt of the SE for the risk-informed resolution licensing action. The completion date in NAMS was specific: 01/31/17. These commitments were not listed as part of the licensee's list of commitments provided to the NRC prior to the on-site audit because they were tracked in NAMS under a LICA designation.
38	ML13149A269 05/15/13	L-2013-168 01872955-07	Unit FPL will submit a final updated supplemental response to support closure of GL 2004-02	01/31/17			Open	
39	ML13284A058 10/01/13	L-2013-291 1907798-01	RE-26-62 repaired or special report updated: If the MSL radiation monitor, RE-26-62, is not restored to service by the end of SLI-25 an update will be provided.	10/25/13	10/23/13	Radiation monitor was repaired.	Closed	These compliance issues were listed in NAMS as Commitments.
40	ML13284A058 10/01/13	L-2013-291 1907798-02	Repair RE-26-62 (NRC Commitment L-2013-291): The detector is being repaired during SLI-25 under WO 40268484.	10/25/13	10/17/13	WO 40268484	Closed	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
41	ML092990394 10/16/09	L-2009-217 00558580-01	When the Fitness for Duty Rule for Managing Fatigue is changed and an exemption from the requirements of 10 CFR 26.205(c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane force winds is no longer needed, FPL will submit a letter to the NRC stating that the exemption is no longer needed.	12/26/15			Open	
42	ML11139A167 05/17/11	L-2011-178 01649522-01	Revise License Renewal Documentation for new EPU requirement The fuel alignment plate, CEA shroud assemblies, and the upper guide structure support plate may be susceptible to irradiation embrittlement in addition to discussion of other degradation mechanisms in the LRA tables. Cracking of these components was previously identified in the LRA. Irradiation embrittlement may result in decreases in fracture toughness of the fuel alignment plate, CEA shroud assemblies, and the upper guide structure support plate; FPL will update License Renewal documentation to reflect this change.	02/15/16			Open	This commitment is embedded in an RAI regarding the Unit 1 EPU LAR and is not easily identifiable.
43	ML11287A039 10/12/11	L-2011-406 01685035-01	FPL commits to inform the NRC about turbine disk inspection results and plans to reduce the probability of turbine missile generation, P1, for continued	01/29/21			Open	This commitment was from an RAI response letter. The commitment is discussed in cover letter but is not provided as a separate section/table for

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
			operation should cracks be detected in the inspection					tracking purposes. There was no due date listed in letter.
44	ML14051A608 02/03/14	L-2014-032 01937510-01	L-2014-032 contains one new regulatory commitment in regards to committing to meeting the timeline in the NEI Open Phase Condition Initiative (Nuclear Energy Institute letter to the NRC, Industry Initiative on Open Phase Condition, dated October 9, 2013. (ML13333A147)); St. Lucie Nuclear Units 1 & 2 have committed to the generic schedule provided in the Industry NEI OPC Initiative, dated October 9, 2013.	12/31/16			Open	
45 ¹	ML13088A173 03/22/13 Updated by: ML14070A097 02/24/14	L-2013-099 Updated by: L-2014-056 01667266-23	Item 1: As stated in Enclosure 2 to ML14070A097.	12/10/15			Open	
46 ¹	L-2013-099 ML13088A173 03/22/13	L-2013-099 01667266-24	Item 2: As stated in Attachment S of ML13088A173.	12/10/15			Open	
47 ¹	ML13088A173 03/22/13	L-2013-099 01667266-25	Item 3: As stated in Attachment S of ML13088A173.	12/10/15			Open	
48 ¹	ML13088A173 03/22/13	L-2013-099 01667266-21	Item 4: As stated in Attachment S of ML13088A173.	12/10/15			Open	

¹ Regulatory Commitments 45 – 65 are related to the licensee's license amendment request regarding "Transition to 10 CFR 50.48(c) - NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants (2001 Edition)" (ADAMS Accession No. ML13088A173). Commitment descriptions in source documentation contain security-related information. Pertinent publically available ADAMS Accession Nos. and dates are provided.

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
49 ¹	ML13088A173 03/22/13	L-2013-099 1667266-10	Item 5: As stated in Attachment S of ML13088A173.	10/31/13	10/19/13	Document detailing drawing revisions reviewed on-site.	Closed	Drawings were included in the reference documentation in NAMS.
50 ¹	ML13088A173 03/22/13	L-2013-099 1622516-04	Item 6: As stated in Attachment S of ML13088A173.	9/12/13	09/10/13	Completion confirmed on- site.	Closed	
51 ¹	ML13088A173 03/22/13	L-2013-099 01667266-26	Item 7: As stated in Attachment S of ML13088A173.	12/10/15			Open	
52 ¹	ML13088A173 03/22/13	L-2013-099 01667266-22	Item 8: As stated in Attachment S of ML13088A173.	12/10/15			Open	
53 ¹	ML13088A173 03/22/13	L-2013-099 01667266-16	Item 9: As stated in Attachment S of ML13088A173.	12/10/15			Open	
54 ¹	ML13088A173 03/22/13 ML15140A220 05/12/15	L-2013-099 01667266-29	Item 10: As stated in enclosure of ML15140A220.	05/14/15 NAMS Date Revised: 03/15/16			Open	Original internal due date was not met. A revised due date was assigned to align with the contractor schedule for NFPA-805 implementation. In ML15140A220, this commitment is listed with a statement that it will be completed no later than 12 months after NRC approval of the LAR. The revised due date falls within this timeframe.
55 ¹	ML13088A173 03/22/13	L-2013-099 01667266-30	Item 11: As stated in Attachment S of ML13088A173.	8/20/15			Open	
56 ¹	ML13088A173 03/22/13	L-2013-099 01667266-30	Item 12: As stated in Attachment S of ML13088A173.	8/20/15			Open	
57 ¹	ML13088A173 03/22/13	L-2013-099 01667266-12	Item 13: As stated in Attachment S of ML13088A173.	12/10/15			Open	

No.	ADAMS Accession No. and Date	FPL Ltr. and NAMS Tracking No.	Commitment Description	Due Date	Completion Date	Implementation Documents Reviewed	Status	Comments
58 ¹	ML13088A173 03/22/13	L-2013-099 01667266-32	Item 14: As stated in Attachment S of ML13088A173.	08/13/15			Open	
59 ¹	ML13088A173 03/22/13	L-2013-099 01876782-09	Item 15: As stated in Attachment S of ML13088A173.	06/15/16			Open	
60 ¹	ML13088A173 03/22/13	L-2013-099 01667266-33	Item 16: As stated in Attachment S of ML13088A173.	07/16/15			Open	
61 ¹	ML13088A173 03/22/13	L-2013-099 01667266-34	Item 17: As stated in Attachment S of ML13088A173.	08/13/15			Open	
62 ¹	ML13088A173 03/22/13 Updated by: ML14070A097 02/24/14 Superseded by: ML15140A220 05/12/15	L-2013-099 Updated by: L-2014-056 Superseded by: L-2015-145 01667266-35	Item 18: As stated in the Enclosure of ML15140A220.	08/13/15			Open	
63 ¹	ML14070A097 02/24/14	L-2014-056 01667266-45	Item 19: As stated in Enclosure 2 to ML14070A097.	08/13/15			Open	
64 ¹	ML15140A220 05/12/15	L-2015-145 01876782-08	Item 20: As stated in the Enclosure of ML15140A220.	09/15/18			Open	
65 ¹	ML13088A173 03/22/13 Superseded by: ML15140A220 05/12/15	L-2013-099 Superseded by: L-2015-145 01876782-03	As stated in the Enclosure of ML15140A220.	05/01/17			Open	

In addition, the NRC auditors communicated with Region II and NRR technical staff to assess implementation of the licensee's commitment change procedure in relation to a commitment change justification. The NRC staff concluded that the licensee's change was properly noticed to the NRC consistent with NEI 99-04 guidance. The NRC staff concludes that, based on the audit: (1) the licensee has implemented NRC commitments on a timely basis; (2) the licensee has implemented an effective program for managing NRC regulatory commitment changes that is consistent with the guidance in NEI 99-04; and (3) all regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews. Details of the audit are set forth in the enclosed report.

Should you have any questions regarding this letter, please contact Candace Pfefferkorn at 301-415-8395 or candace.pfefferkorn@nrc.gov, or me at 301-415-1447 or farideh.saba@nrc.gov.

Sincerely,

/RA/

Farideh E. Saba, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos.: 50-335 and 50-389

Enclosure: Audit Report

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