



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

April 26, 2016

Mr. Bryan C. Hanson  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

**SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - AUDIT OF EXELON  
GENERATION COMPANY, LLC'S MANAGEMENT OF REGULATORY  
COMMITMENTS (CAC NO. MF6608)**

Dear Mr. Hanson:

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 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 regulatory commitments are being effectively implemented. The previous audit of the licensee's commitment management program for Three Mile Island Nuclear Station, Unit 1 (TMI-1) was documented in an NRC letter dated December 28, 2012 (Agencywide Documents Access and Management System Accession No. ML12348A353).

An audit of the commitment management program for TMI-1 was performed during the last quarter of 2015, with the onsite portion taking place October 13 - 16, 2015. As a result of the

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audit, the NRC staff concludes that TMI-1 has implemented NRC commitments on a timely basis and TMI-1 has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

A handwritten signature in black ink, reading "Robert L. Gladney". The signature is written in a cursive style with a large, sweeping "R" and a long, horizontal tail.

Robert L. Gladney, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:  
Audit Report

cc w/enclosure: Distribution via Listserv

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
OF REGULATORY COMMITMENTS MADE BY EXELON GENERATION COMPANY, LLC  
TO THE NUCLEAR REGULATORY COMMISSION  
FOR THREE MILE ISLAND NUCLEAR STATION, UNIT 1  
DOCKET NO. 50-289

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 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML003741774), that the Nuclear Energy Institute (NEI) document NEI 99-04, "Guidelines for Managing NRC Commitment Changes" (ADAMS Accession No. ML003680088), contains acceptable guidance for controlling regulatory commitments. RIS 2000-17 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. 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.

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 regulatory commitments are being effectively implemented. 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.).

An audit of the commitment management program for Three Mile Island Nuclear Station, Unit 1 (TMI-1) was performed during the last quarter of 2015, with the onsite portion taking place October 13 - 16, 2015. The previous audit of the licensee's commitment management program for TMI-1 was documented in an NRC letter dated December 28, 2012 (ADAMS Accession No. ML12348A353).

2.0 AUDIT PROCEDURE AND RESULTS

The audit was performed in accordance with the guidance in NRR Office Instruction LIC-105, Revision 5, "Managing Regulatory Commitments Made by Licensees to the NRC," dated September 16, 2013 (ADAMS Accession No. ML13193A358). The NRC staff reviewed commitments made during the period since the previous audit. 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

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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.

Prior to the audit, the licensee provided the NRC staff with a list of regulatory commitments from its PassPort Action Tracking Program, which is the licensee's system used for commitment management at TMI, as well as the applicable regulatory commitment management procedures. The licensee's list of regulatory commitments included open commitments, commitments initiated since December 2012 (and prior), and commitments closed within the audit window. The licensee also provided the previous biennial report to the NRC containing commitments that were changed in 2012 and 2013.<sup>1</sup> During the onsite portion of the audit, the licensee provided additional documentation for the commitments requested for the audit, as well as several commitment change evaluation forms (CCEFs) and other documentation for commitments changed from 2013 to 2015. For the sampled commitments, the licensee provided PassPort Tracking Numbers (Exelon Tracking Nos.), brief commitment descriptions, licensee letter numbers, commitment due dates and completion dates, and other associated documentation.

### 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 for the licensee's submittals since the last audit and selected a representative sample for verification. The commitments included in the review are described in Table 1 of this Audit Report.

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.

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<sup>1</sup> "Three Mile Island Nuclear Station, Unit 1 - Biennial 10 CFR 50.59 and Commitment Revision Reports for 2012 and 2013" (ADAMS Accession No. ML14106A020), dated April 16, 2014, for 2012 and 2013 commitments.

- (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 (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

Table 1 provides the results of the audit for the verification of the licensee's implementation of commitments. For the sampled commitments, the NRC staff determined that the licensee had appropriately implemented the closed commitments and scheduled the open commitments for future implementation. The staff also determined that the commitment tracking database allows for the adequate traceability of implemented commitments. There were no significant issues identified for this part of the audit. Section 2.4 of this report provides additional observations.

## 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 process used at TMI-1 is primarily contained in licensee procedures LS-AA-110, Revision 11, "Commitment Management," and LS-AA-110-1001, Revision 7, "Commitment Tracking Program T&RM<sup>2</sup> [Training and Reference Material]: For Use with PassPort." This part of the audit also included a review of a sample of commitment changes, as described in Table 2, which included changes that were or will be reported to the NRC, and changes that were not or will not be reported to the NRC.

### 2.2.1 Audit Results

The NRC staff reviewed the licensee's procedures LS-AA-110, Revision 11 and LS-AA-110-1001, Revision 7, against NEI 99-04 to ensure that guidance in this procedure is consistent with the intent of NEI 99-04, and that the licensee is appropriately implementing regulatory commitment changes, as well as tracking changes to the commitments. Section 6.1 of LS-AA-110 lists NEI 99-04 as a reference. The NRC staff found that the procedures generally follow the guidance of NEI 99-04 and provide detailed instructions for making regulatory commitments, tracking regulatory commitments, annotating documents to provide traceability of commitments, and for making changes to commitments. The NRC staff concludes that the procedures used by the licensee to manage commitments provide the necessary attributes for an effective commitment management program.

During the audit, the NRC staff observed that the licensee had provided, "Three Mile Island Nuclear Station, Unit 1 - Biennial 10 CFR [Title 10 of the *Code of Federal Regulations*] 50.59 and Commitment Revision Reports for 2012 and 2013," dated April 16, 2014, for 2012 and 2013 commitments, but had not provided a report of 2014 and 2015 commitment revisions. NEI 99-04 does not limit the licensee to only annual reporting to the NRC, but instead requires "notification to the NRC made in a report submitted annually or along with the FSAR updates as

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<sup>2</sup> The licensee provides this acronym as part of the procedure title.

required by 10 CFR 50.71(e).” However, licensee procedure LS-AA-110, step 4.7.3, does require that a written report of commitment changes be submitted to the NRC every calendar year. The NRC resident inspectors provided the NRC auditor with licensee Assignment Report (AR) 02568457, which the licensee had previously written to document the issue, take the immediate action to discuss this with site and corporate licensee personnel, and to schedule actions to submit reports to the NRC in 2016 and 2017. As a result, the NRC staff expanded this portion of the commitment audit sample to include 2014 and 2015 commitments. In addition, the NRC auditor and resident inspectors discussed this issue with the licensee during the audit and at the exit meeting.

In addition, the NRC staff observed that while the licensee is required to complete LS-AA-110, Attachment 1, “Commitment Change Evaluation Form,” per LS-AA-110, Section 4.6, there were instances in which a CCEF was not available. As detailed in Table 2 of this report, there were several commitments in which the licensee notified the NRC of the commitment changes and is tracking them in the licensee commitment tracking database, but did not have an available CCEF. The NRC staff discussed this requirement with the licensee.

Table 2 provides the detailed results of the audit of commitment changes for TMI-1. There were no significant issues identified in this part of the audit. However, some observations were made, as explained above and in Section 2.4 of this report.

### 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 action comprising the commitment was relied on by the NRC staff 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 a 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 safety-significant actions (i.e., commitments used to ensure safety).

The current version of LIC-105, Revision 5, states that the NRC staff should take the following actions to identify misapplied commitments:

- (1) Determine if the commitment reviewed involves actions that were safety significant (i.e., commitments used to ensure safety).
- (2) Determine if the commitment reviewed involves actions that were necessary for approval of a proposed licensing action.

The scope of this portion of the audit includes reviewing each of the commitments selected for the audit sample (i.e., Tables 1 and 2) to determine if any had been misapplied (per the two criteria shown above). No misapplied commitments were identified for this portion of the audit.

### 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, all license amendment, relief request, and exemption safety evaluations that have been issued for a facility since the previous audit were identified. Table 3 lists each of these documents for TMI-1. The NRC staff identified all commitments discussed in these documents and evaluated each commitment to determine if it had been misapplied based on the two criteria discussed in Section 2.3.1 of this report.

The details and results for this portion of the audit are provided in Table 3 of this report. No misapplied commitments were identified for this portion of the audit.

### 2.4 Audit Observations

During the audit, the NRC staff had the following observations. These observations were communicated to the licensee during the audit.

- (1) The NRC staff observed that commitments for multiple Exelon Generation Company, LLC (Exelon) plants are maintained in the same commitment tracking database. However, the licensee is able to easily and effectively narrow its search criteria to TMI-1 commitments. Tracking the commitments in this database also allows the licensee to maintain consistency with how it manages various commitments across its fleet.
- (2) As indicated previously in this report, the licensee primarily uses two procedures for commitment management at TMI-1: LS-AA-110 and LS-AA-110-1001. While another procedure, LS-AA-110-1002, "Commitment Tracking Program for Use with PIMS," is also used at other plants within the Exelon fleet for commitment management, the licensee indicated that the Plant Information Management System is used at TMI-1 for corrective actions and not for commitment management. None of these commitment management procedures provide information regarding which are used at each specific site and under what conditions they should be utilized. The licensee should provide clarifying guidance in a procedure or other document so that this information is readily available.
- (3) Licensee procedure LS-AA-110, step 4.7.3, requires the licensee to submit an annual commitment revision report to the NRC. During the audit, the NRC staff observed that the last summary report submitted was by letter dated April 16, 2014, which addressed 2012 and 2013 commitments. No summary report was submitted for 2014 commitments. Prior to the onsite portion of the audit, the licensee identified that it had not submitted this annual report. The licensee wrote AR 02568457, "Commitment Changes Not Submitted to NRC Annually," on October 9, 2015, which is described below and in Section 2.2.1 of this report, and included actions to address this issue.

- Actions regarding AR 02568457:
  - This AR noted that although LS-AA-110, step 4.7.3, requires an annual summary report to the NRC for commitment revisions, the practice has been to submit it with the 10 CFR 50.59 report biennially, per LS-AA-104, "Exelon 50.59 Review Process."
  - The immediate action taken was that the site and corporate Regulatory Assurance groups discussed the procedural requirement for sending an annual report of commitment changes.
  - Recommended actions included providing a report of 2014 and 2015 commitment changes to the NRC in April 2016, and creating an assignment to report 2016 commitment changes by March 31, 2017. In addition, the licensee's staff provided CCEFs 14-01 through 14-09, 15-01, and 15-02, and associated documentation, to the NRC staff during the onsite portion of the audit. Accordingly, the NRC staff expanded its sample of commitments evaluated in the audit to include samples from this subset.
- (4) Licensee procedure LS-AA-110, Section 4.6, requires that CCEFs (LS-AA-110, Attachment 1) be completed for all commitment changes. The NRC staff determined that there were commitment changes for which CCEFs were not provided. Included within this issue is a conflict in licensee procedures LS-AA-110 and LS-AA-110-1001, since LS-AA-110, step 4.6.4, item 6, states that, "If the proposed change is rejected, then the requestor may discard the CCEF," whereas LS-AA-110-1001, step 5.1, states that, "Documentation associated with regulatory commitment changes shall be maintained for the life of the facility as a 'life of the plant' record." The licensee wrote AR 2596888 to address this issue by evaluating LS-AA-110 and to make changes, as appropriate, so that it provides additional guidance and clarification for CCEF documentation and retention.
- (5) The licensee is able to track commitments by classifying them as such in its database, but there are no separate classifications for commitment revisions and obligations. The NRC staff observed that while the licensee can perform a word search to find commitment revisions and obligations within its commitment tracking database, it would be more effective if these items could be more easily classified, identified, and tracked.

Another observation was described in TMI Integrated Inspection Report 5000289/2015003 (ADAMS Accession No. ML15306A380), dated November 2, 2015, which documented a finding of very low safety significance (Green). This finding did not involve an NRC violation but was concerning a commitment from original plant construction that was not implemented. The resident inspectors determined that the licensee failed to perform fire service system modifications for mitigating the potential impact of a pipe rupture in the auxiliary building as committed to the NRC in a letter dated November 10, 1972. As stated in the inspection report, this was determined to be a Green finding because, "the finding is not a design or qualification deficiency, does not represent a loss of system safety function or loss of a single train for greater than its allowed TS time, does not result in the loss of a high safety-significant maintenance rule train and does not involve the loss of function to mitigate internal flooding

events.” The inspection report indicated that the licensee documented this in Incident Report (IR) 2544387, performed an immediate operability evaluation, and developed corrective actions. (AR 2547232 was also written and incorporates additional actions.)

In addition, the licensee documented an error regarding Exelon Tracking No. 1122072-01 in IR 2449863, “Commitment Frequency Changed Out of Process.” In this IR, the following was stated:

Generic Letter 89-13 Program basis document ER-TM-340-1001 contains commitment 32, perform AH-C-4B Control Building Chiller Annual Inspection (PM000269). Per the Generic Letter commitment, this inspection is to be done on a one year frequency. In May of 2013, the frequency was changed by a system engineer to 1.5 years via AR [evaluation] A2277159-69 and no commitment change was processed.

As described above, the preventive maintenance (PM) frequency associated with the referenced commitment had been temporarily changed out of process from 1 year to 1.5 years. Based upon the licensee’s documentation, the PM frequency was changed due to reliability issues with the opposite train chiller and because the initiator of the change did not realize that the PM frequency was associated with a regulatory commitment.

- Actions regarding IR 2449863:
  - As an immediate action, the licensee discussed this with the system engineer for processing of the frequency correction in accordance with evaluation A1721611-10.
  - Recommended action also included performing a review of all PM activities that implement GL 89-13 commitments to ensure that the PM activities have the correct frequencies and appropriate language.

### 3.0 CONCLUSION

The NRC staff concludes, based on the audit, that (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) the regulatory commitments reviewed were correctly applied in NRC staff licensing action reviews.

4.0 LICENSEE PERSONNEL CONTACTED FOR THIS AUDIT

R. Miller  
D. Atherholt  
M. Fitzwater  
F. Mascitelli

Principal Contributor: R. Gladney

Date: April 26, 2016

Attachments: Table 1, "Reviewed Licensee Commitments (TMI-1)"  
Table 2, "Verification of the Licensee's Program for Managing NRC  
Commitment Changes (TMI-1)"  
Table 3, "Review of NRC License Amendments, Relief Requests, and  
Exemptions (TMI-1)"

**TABLE 1**  
**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
10/18/12 (ML12292A584)	ME9818	RR-12-02, dated 6/10/2013 (ML13134A467)	As stated by the licensee: "[Provide] the results of the ultrasonic examination of the Full Structural Weld Overlay on the TMI, Unit 1 lower cold leg letdown nozzle dissimilar metal welds and Alloy 600 safe-end. The results will include: (1) A list of the indications detected, (2) The disposition of all the indications using the standards of ASME Code Cases N-740-2 and N-770-1, (3) The type and, if possible, nature of the indications. Also included in the results will be a discussion of any repairs to the overlay material."	Complete.  The Safety Evaluation (SE) states: "The licensee will provide the results within 30 days after the completion of the last UT examination of weld overlays during the Fall 2013 TMI-1, T1 R20 refueling outage. The NRC staff reviewed this commitment and finds it acceptable. The NRC staff also concludes that tracking this commitment under the licensee's commitment tracking program is appropriate."  Exelon letter TMI-13-168 (ML13338A431), dated 12/3/2013, discussed the closeout of the commitment and did not contain new commitments. The letter states: "During the recent TMI, Unit 1 refueling outage, the identified welds were successfully overlaid. Ultrasonic examinations of these overlays did not identify any indications. Additionally, there were no repairs to the overlay material. Accordingly, this commitment is complete."  (Exelon Tracking No. 1428966-01)
Letter dated 10/31/12 (ML12306A199) s. 10/14/14 ML14287A659 (non-public)	ME9989	Safety Assessment of Communications, dated 7/12/13 (ML13114A067)	This commitment involves TMI's Emergency Plan (EP). The licensee's letter dated 10/31/12 states: "EGC will install EP communications equipment as described in Attachment 10 (Planned or Potential Improvement Identified column) at the [TMI], and complete appropriate training to response personnel and corporate ERO members pertaining to location, purpose and use of the communications equipment." This commitment was revised by the licensee letter dated 10/14/14 so that instead of purchasing satellite communications trailers with cellular	Closed.  The licensee's submittal had a due date of fall 2015 for TMI in Attachments 11 and 12. It is Exelon Tracking No. 1362747-55-00, and the licensee closed this item on 11/24/15. (The commitment for the NEI 12-01 communications strategy is related

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**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
			phones as a method for maintaining offsite communications, Exelon was to provide satellite dish communication systems consisting of portable and fixed elements.	and is Exelon Tracking No. 1362747-59.) The intent of the original commitment appears to have been satisfactorily met.
<p>Licensee letter dated 11/19/12 (RS-12-175, ML12362A045, Package ML123620050)</p> <p>Licensee letter dated 9/16/13 (RS-13-213/ RA-13-081/ TMI-13-109 ML13260A083)</p> <p>Licensee letter dated 3/28/14 (RS-14-032, ML14093A533, Package ML14093A527)</p>	MF0185	<p>NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated 3/12/12 (ML12053A340)</p> <p>NRC Staff Assessment, dated 5/6/14 (ML14105A116)</p>	<p>This commitment involves the Seismic Walkdown Deferred Inspections for TMI. Licensee letter RS-12-175/ TMI-12-161, dated 11/19/12, had 2 commitments in Enclosure 2.</p> <p>The first commitment stated the following: "[EGC] will complete the walkdown of the fifteen (15) TMI Unit 1 items deferred due to inaccessibility identified in Table E-1. This commitment due date was T1R21 (Fall 2015). The second commitment stated the following: "EGC will complete the fifteen (15) remaining supplemental inspections of TMI Unit 1 electrical items as identified in Table E-2." Its due date was T1R20 (Fall 2013).</p> <p>The licensee letter dated 9/16/13, contained a TMI-specific evaluation in Attachment 11 and a list of commitments for the Exelon fleet in Attachment 12 (two were applicable to TMI). It was indicated in Attachment 11 that all of the walkdown commitment items from the 11/19/12 letter, which included E-1 and E-2, would be completed by the end of 2014 and that the items in Table E-2 were complete. Regarding the E-1 items, it also indicated that a new regulatory commitment in Attachment 12 replaced the first of the two commitments from the 11/19/12 letter (Enclosure 2, item 1). This new commitment was item 21 in the list of commitments in Attachment 12 and states: "EGC will complete the inspections of the [TMI] components listed in Attachment 11." The due date was 12/31/13.</p> <p>The licensee letter dated 9/16/13 also contained another new TMI commitment in Attachment 12 (item 22) that indicated that the final seismic walkdown report documenting the results of Attachment 11 inspections would be submitted by 3/31/14.</p>	<p>Complete.</p> <p>These commitments involved the E-1 and E-2 items in Enclosure 2 of the licensee letter dated 11/19/12 and were merged into commitments in Attachment 12 of the licensee letter dated 9/16/2013. (Exelon Tracking No. 1427154-55-00 involved the E-1 items and 1427154-56-00 involved the E-2 items. These commitments were superseded by Exelon Tracking Nos. 1427154-90-00 and 1427154-91-00, in that 1427154-90-00 is for the completion of the inspections associated with both the 1427154-55-00 and 1427154-56-00 commitments and 1427154-91-00 was for the submission of the report to the NRC.)</p> <p>Licensee letter RS-14-032, dated 3/28/14, indicated that Commitments 1 and 2 contained in the 11/19/12 letter and Commitments 21 and 22 contained in the 9/16/13 letter were complete. This was also further indicated in Section A1.1 of this letter, which indicated that commitments 1 &amp; 2 in Enclosure 2 of RS-12-175 were completed (ML14093A533).</p>
Attachment 2 to the letter dated 5/16/13 (ML13137A309),	MC4724	GL 2004-02	This commitment is for the replacement of the NUKON insulation installed on the pressurizer with Reflective Metallic Insulation (RMI).	<p>Open: T1R21 (Fall 2015, 10/28/15)</p> <p>(Exelon Tracking No. 1516774-01)</p>

**TABLE 1**  
**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
as part of the licensee's plan and schedule for responding to Generic Letter 2004-02.				
Letter dated 4/16/2012 (ML12108A029) s. 4/17/2013 (ML13108A004)	MF1459	Letter and Non-Proprietary SE (ML14297A411)	This commitment involved TMI's Reactor Internals Inspection Plan. The commitment requires the licensee to identify the Reactor Vessel Internals (RVI) components that are within license renewal scope and to determine if they are included within MRP-227A. If there are components within License Renewal scope that weren't included, the licensee shall propose requirements beyond MRP-227A.	Complete.  The licensee submitted the requested information in the letter dated 4/17/2013. (This action was to be completed by 4/19/13.)  (Exelon Tracking No. 603573-36-09)
Letter dated 4/17/2013 (ML13108A004) s. 11/06/13 (ML13317A931)	MF1459	Letter and Non-Proprietary SE (ML14297A411)	This commitment involves TMI's Reactor Internals Inspection Plan inaccessible components identified in Table 4-4 of MRP-227-A. The commitment requires the licensee to submit an analysis, schedule, or alternative process justification within one year of the initial inspection (Fall 2017), with a due date of 12/15/18, if the primary component inspection does not meet the acceptance criteria of MRP-227-A. (This action was originally Exelon Tracking No. 603573-36-10 but was closed to Exelon Tracking No. 603573-36-12.)	Open: The required completion date of this commitment was previously 4/19/2013 and was changed to within one year of the inspection (Fall 2015) as requested in the licensee letter dated 4/17/13 as Exelon Tracking No. 603573-36-10. The completion date was subsequently changed again to within one year of the inspection (Fall 2017) as requested in the licensee letter dated 11/6/13 and is Exelon Tracking No. 603573-36-12.
Letter dated 4/17/2013 (ML13108A004) s. 11/06/13 (ML13317A931)	MF1459	Letter and Non-Proprietary SE (ML14297A411)	This commitment involves TMI's Reactor Internals Inspection Plan. The commitment requires the licensee to submit Control Rod Guide Tube (CRGT) Spacer Castings and Incore Monitoring Instrumentation (IMI) Spider Castings evaluations by 10/30/16. The revised commitment also added a vent valve retaining ring analysis that is required to be submitted by 10/30/2016. (This action was originally Exelon Tracking No. 603573-36-11 but was closed to Exelon Tracking No. 603573-36-13.)	Open: The required completion date of this commitment was previously 4/19/2013 and was changed to 10/30/2014 as requested in the licensee letter dated 4/17/13 as Exelon Tracking No. 603573-36-11. The completion date was subsequently changed again to 10/30/16 as requested in the licensee letter dated 11/6/13 and is Exelon Tracking No. 603573-36-13.
Attachment 2 to the letter dated	MC4724	GL 2004-02	Complete strainer head loss testing based on the reduced debris load for TMI, Unit 1.	Complete. The licensee's documentation indicated that this

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**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
5/26/13 (ML13137A309), as part of the licensee's plan and schedule for responding to Generic Letter 2004-02.				testing (following pressurizer insulation replacement) was completed in 12/14 and 1/15 and is documented in the "TMI Large Scale Head-Loss Test Report" (1142TMIGSI-R2-00), dated 3/23/15.  (Exelon Tracking No. 1516774-02)
Attachment 2 to the letter dated 5/26/13 (ML13137A309), as part of the licensee's plan and schedule for responding to Generic Letter 2004-02.	MC4724	GL 2004-02	Re-evaluate the strainer debris bypass for TMI, Unit 1. This would include a review of available information for the Enercon top hat design strainer with a Debris Bypass Eliminator installed and/or performance of a site-specific debris bypass test.	Open: 7/31/16  (Exelon Tracking No. 1516774-03)
Attachment 2 to the letter dated 5/26/13 (ML13137A309), as part of the licensee's plan and schedule for responding to Generic Letter 2004-02.	MC4724	GL 2004-02	EGC will submit a final updated supplemental response to support closure of GL 2004-02 for TMI, Unit 1.	Open: 6/1/17  (Exelon Tracking No. 1516774-04)
RAI response letter dated 3/31/14 (public) (ML110940225) (non-public) Enclosure (ML110940226)  Letter dated 8/29/14 (public)	MF4749	Amendment No. 275, dated 8/10/11 (ML111861341)  Amendment No. 288, dated 7/30/15 (ML15153A282)	This commitment involves the Cyber Security Plan (CSP). By letter dated 8/10/11 (ML111861341), the NRC staff issued fleet amendments that approved the CSP and implementation schedule for TMI and other plants. The approved schedule stated that Milestone 8 would be completed no later than 12/31/15, as requested in Enclosure 3 of the licensee letter dated 3/31/14. Based upon the requirements in 10 CFR 73.54 and the license amendments, changes to the schedule require prior NRC approval. In an NRC memorandum dated 10/24/13 (ML13295A467), the staff listed criteria to consider when	Open: 12/31/17. As noted in the SE, these actions were elevated from commitments to obligations. The licensee's documentation for Exelon Tracking No. 1223694-80-00 notes this and that a change would require NRC approval per 10 CFR 50.90.  (Exelon Tracking No. 1223694-80-00)

**TABLE 1**  
**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
(ML14241A526) (non-public) (ML14241A525)			<p>evaluating requests to revise the CSP full implementation date (i.e., Milestone 8).</p> <p>By application dated 8/29/14 (ML14241A526), the licensee proposed changes that would revise the date (from 12/31/15 to 12/31/17) of CSP implementation schedules for Milestone 8 and license conditions for several Exelon plants, including TMI.</p> <p>As indicated in the NRC SE dated 7/30/15 (ML15153A282), the licensee's proposed commitment changes were accepted. Also, as stated in Section 3.3 of the SE: "The CSP implementation schedules are obligations under 10 CFR 73.54 and the associated amendments approving the CSP for each facility. As such, changes to the CSP implementation schedules will require NRC approval in accordance with 10 CFR 50.90. Therefore, the licensee should not be managing the CSP implementation schedules as regulatory commitments."</p>	
<p>Letter dated 7/10/14 (ML14191A059)</p> <p>Letter dated 10/14/08 (ML082880706)</p>	MF4435	Amendment No. 285, dated 6/30/15 (ML15121A589)	<p>The SE does not discuss commitments, but the submittal satisfies a commitment. In its 7/10/14 letter, the license states: "The proposed amendment would modify TS requirements to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TS Task Force Traveler 523 (TSTF-523), Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation." TMI, Unit 1 committed to evaluate the resolution of the TS issues with respect to the elements contained in the TSTF, and submit a license amendment request, if deemed necessary based on the evaluation, within 180 days following NRC approval of [TSTF-523]. This submittal satisfies the commitment."</p>	<p>Closed.</p> <p>This submittal closes the licensee commitment indicated in the 10/14/08 letter.</p> <p>(Exelon Tracking Nos. 1516774-04, 1122072-24, 763395-04, 1600914-06, and 704366-87)</p>
<p>9/19/14 (ML14262A002) s. 11/19/14 (ML14328A189)</p>	MF4873	RR-14-01 Concerning Alternative Root Mean Square Depth Sizing Requirements, dated 9/15/15 (ML15163A249)	<p>The licensee's letter dated 9/19/14 contains the commitment. It states: "Inner Diameter (ID) surface breaking flaws greater than 50% through-wall and subsurface flaws greater than 50% through-wall shall be repaired or evaluated prior to plant restart. Evaluations shall be submitted to the NRC for review and approval prior to plant restart."</p> <p>The SE discusses this commitment, which was elevated to a</p>	<p>Open: Prior to plant restart from the Fall 2015 outage</p> <p>The licensee has actions to perform an impact review to determine how licensee documents and programs will be affected, perform the repairs or evaluations (if necessary), to provide a report to the NRC. (Exelon</p>

**TABLE 1**  
**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

TMI-1 Submittal Date	NRC CAC No.	NRC Source/ Issuance	Summary of Regulatory Commitment	Licensee Implementation Status and Tracking No. (if applicable)
			<p>requirement of the relief request. It was imposed as part of the alternative in accordance with 10 CFR 50.55a(g)(6)(i).</p>	<p>Tracking Nos. include 2567708-01 and 2567708-02) The licensee's documentation also indicates that it is included in the Core Flood Nozzles examination contingency plans (Exelon Tracking No. 1476721-62-02)</p> <p>The licensee's documentation states the following:            "The T1R21 (2015) inspection of the Core Flood Nozzles were completed satisfactorily with no changes from the previous inspection performed in 2009. The flaws were less than 50% through-wall and acceptable for continued service. No submittal to the NRC is required. This assignment is being moved to 11/30/21 to support the next scheduled inspection of the Core Flood B Nozzle Dissimilar Metal Weld. RR-14-01 remains valid for the 2021 inspection."</p> <p>The licensee has also indicated that the obligation was incorporated into TMI 04.603, TMI-Unit 1, ISI Program Plan.</p>
<p>2/4/2013 (ML14084A270) s. 3/24/2014 (ML14084A270) s. 9/26/2014 (ML14269A351)</p>	<p>MF0628</p>	<p>Amendment No. 284, dated 12/30/14 (ML14330A300)</p>	<p>This amendment involved the deletion of various reporting requirements from the current TMI TS.</p> <p>The 9/26/14 letter has the following commitment:            "Incorporate a description of the Periodic Leak Reduction Program into the licensing basis by revising UFSAR Section 6.4, "Engineered Safeguards Leakage and Radiation Considerations."            The SE states the following:            "Based on the NRC staff's review, the staff finds that the licensee's current proposed amendment only requests the deletion of the Annual Reporting requirement for the NUREG-0737-related Periodic Leak Reduction program and that</p>	<p>Complete.</p> <p>Section 6.4 of the FSAR has been revised to include the Periodic Leak Reduction Program as Section 6.4.6.</p> <p>(Exelon Tracking No. 1235054-10)</p>

**TABLE 1**  
**Reviewed Licensee Commitments (TMI-1)**  
**(See Note 1)**

<b>TMI-1 Submittal Date</b>	<b>NRC CAC No.</b>	<b>NRC Source/ Issuance</b>	<b>Summary of Regulatory Commitment</b>	<b>Licensee Implementation Status and Tracking No. (if applicable)</b>
			the licensee's commitment to the program as was stated by the licensee in its 1/23/81, response to the staff's 50.54(f) letter mentioned above, is not affected by the proposed change. Furthermore, according to the licensee's response to the RAI, the program will be reflected in its licensing basis by revising UFSAR Section 6.4, 'Engineered Safeguards Leakage and Radiation Considerations.' In addition, the licensee stated that the requirements for the program are currently addressed in its leakage surveillance procedures."	
Letter dated 12/22/2014 (ML14356A342) s. 4/6/15 (ML15097A125) TMI 10 CFR 50.46 Report	MF5564	TMI Closure Evaluation for Report Pursuant to 10 CFR 50.46 Requirements Related to Thermal Conductivity Degradation, dated 12/17/2015 (ML15306A503)	The licensee has replaced its original commitment. The licensee has now committed to completing the full LBLOCA re-analysis within 21 months following NRC issuance of the final Safety Evaluation Report (SER) for BAW-10179, Revision 9, and the licensee also stated that it incorporates by reference the supplement to BAW-10192P-A, Revision 0.	Open: Within 21 months following NRC issuance of the final SER for BAW-10179, Revision 9.

Note 1: The scope of the audit includes commitments closed during the previous 3 years and currently open commitments associated with NRC licensing actions (e.g., amendments, relief requests, exemptions, orders) or licensing activities (e.g., bulletins, generic letters). See Audit Report Section 2.1 for further details.

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

<b>Change Tracking No.(s)</b>	<b>Source</b>	<b>Change/Deletion</b>	<b>NRC Notification</b>	<b>ADAMS Accession No.</b>
Exelon Tracking Nos: 603573-15-04, 603573-15-07, and 603573-15-21	Exelon letter TMI-13-106 dated 9/12/13, Revision to License Renewal Commitment Relating to the Above Ground Steel Tanks Aging Management Program	The Sodium Hydroxide Tank (BS-T-2) was removed from the Above Ground Steel Tanks Aging Management Program scope and the visual inspection was added to the scope of the External Surfaces Monitoring Program. There were no safety issues identified as a result of this change.	Yes. Additionally, this was evaluated in NRC License Renewal Commitments Inspection Report 05000289/2014008 (ML14101A286). This inspection report states the following: "In a letter dated September 12, 2013, Exelon informed the NRC the Sodium Hydroxide Tank is no longer used and the visual inspection would be performed as part of the External Surfaces Monitoring Program. The inspectors concluded Exelon was correctly applying the commitment management process stipulated in NEI 99-04 [Revision 0], "Guidelines for Managing NRC Commitment Changes," (ML0036800880) when informing the NRC about this change."	ML13260A079

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

<b>Change Tracking No.(s)</b>	<b>Source</b>	<b>Change/Deletion</b>	<b>NRC Notification</b>	<b>ADAMS Accession No.</b>
Commitment Change Tracking No. 13-01  Exelon Tracking No. 1122072-01	Three Mile Island Nuclear Station, Unit 1 - Biennial 10 CFR 50.59 and Commitment Revision Report for 2012 and 2013 (ML14106A020)  GL 89-013	The biennial revision report documents Licensing Letter 6710-96-2096 Attachment 1, "GL 89-013: Revised Response – Service Water System Problems Affecting Safety Related Equipment," as the letter source. The following is stated in the revision report as the nature of the commitment: "The Emergency Cooling Coils will be subject to a combination of visual inspections and trending. Visual inspection of the air side and monitoring of air and water flows will occur each outage." The revision report indicates that this commitment was changed to monitoring of air flows every other outage per Commitment Change Evaluation Form 13-01.	Yes. The report also provides a justification for this change and no safety issues were identified, as confirmed by the licensee's documentation for Commitment Change Tracking No. 13-01.  (The licensee also previously documented an error in Incident Report (IR) 2449863 for a related GL 89-013 commitment associated with this tracking number as well, in which a Control Building Chiller frequency was changed out of process. It was changed back to the correct frequency as a result of an evaluation. This is discussed in Section 2.4 of this report.)	ML14106A020
Commitment Change Tracking No. 13-02  Exelon Tracking No. 603573-11	Three Mile Island Nuclear Station, Unit 1 - Biennial 10 CFR 50.59 and Commitment Revision Report for 2012 and 2013 (ML14106A020)	The letter documents NUREG-1928 as the letter source. The revision report indicates that this commitment was revised to have the TMI UFSAR match TMI's SER (NUREG-1928), which the licensee considered to be consistent with the GALL (NUREG-1801, Rev. 2).	Yes. It was provided in the biennial report to the NRC.	ML14106A020
Exelon Tracking No. 1362747-55-00	Revision to Exelon Generation Company, LLC Commitment Relating to Emergency Communications Aspects of Recommendation 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident (licensee letter dated 10/14/14, ML14287A659)	As one of the methods for maintaining offsite communications, Exelon committed to purchasing satellite communications trailers with cellular phones for several plants in its fleet. This commitment was revised such that Exelon will provide the sites with satellite dish communication systems consisting of portable and fixed elements.	Yes. The NRC was notified by the indicated letter.	ML14287A659 (non-public)

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

Change Tracking No.(s)	Source	Change/Deletion	NRC Notification	ADAMS Accession No.
<p>Exelon Tracking No: 603573-36-12 (formerly 603573-36-10)</p> <p>Exelon Tracking No: 603573-36-13 (formerly 603573-36-11)</p>	<p>Inspection Plan for Reactor Internals</p> <p>Licensee letter, dated 4/17/13 (ML13108A004) s. 11/06/13 (ML13317A931)</p>	<p>These two commitments involve TMI's Reactor Internals Inspection Plan and had extensions to the due dates. One commitment was regarding inaccessible components identified in Table 4-4 of MRP-227-A and requires the licensee to submit an analysis, schedule, or alternative process justification within one year of the initial inspection (Fall 2017), with a due date of 12/15/18, if the primary component inspection does not meet the acceptance criteria of MRP-227-A. The other requires the licensee to submit Control Rod Guide Tube (CRGT) Spacer Castings and Incore Monitoring Instrumentation (IMI) Spider Castings evaluations by 10/30/16.</p>	<p>Yes. They both previously had a due date of 4/19/13 but the licensee requested that both of their dates be changed in a letter dated 4/17/13 and subsequently in a letter dated 11/6/2013.</p>	ML13317A931
Exelon Tracking No. 1516774-01	<p>"Clarification of Commitment Regarding Resolution of Generic Letter 2004-02", letter from the licensee to the NRC, dated 9/10/15 (ML15254A045)</p>	<p>This letter provided clarification regarding the following commitment in Attachment 2 to the letter to the NRC dated 5/26/13 (ML13137A309), as part of the licensee's plan and schedule for responding to Generic Letter 2004-02:</p> <p>"Replace the Nukon insulation currently installed on the pressurizer with Reflective Metallic Insulation (RMI) for TMI, Unit 1."</p> <p>Per the licensee, this was a "one-time action with a committed date of the T1R21 Refueling Outage in the fall of 2015."</p> <p>The licensee indicated that it planned to replace "approximately 80% of the Nukon insulation on the pressurizer" and that it did not anticipate the need</p>	<p>Yes. The license also stated: "Preliminary debris analyses and strainer test results indicate that the reduction in fibrous debris due to the removal of approximately 80% of the pressurizer NUKON insulation will be adequate with respect to ECCS pump NPSH concerns. This reduction in NUKON insulation will also reduce the quantity of fibrous debris bypassing the strainer."</p>	ML15254A045

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

Change Tracking No.(s)	Source	Change/Deletion	NRC Notification	ADAMS Accession No.
		to remove more NUKON insulation in the Reactor Building.		
Exelon Tracking No. 1223694-80	Fleet Cyber Security Milestone 8 Amendment No. 288.  Licensee letter, dated 8/29/14 (The non-proprietary version is ML14241A526.)	By application dated 8/29/14 (ML14241A526), the licensee proposed changes that would revise the date (from 12/31/15 to 12/31/17) of regulatory commitments for the TMI CSP implementation schedules and Milestone 8, which involves the full implementation of the CSP. The licensee indicated in its application that the revised date would allow EGC to align its fleet to a common implementation schedule, complete assessments, and implement the resulting design modifications. The licensee provided the proposed revision to the TMI cyber security regulatory commitment related to the Milestone 8 completion date in Attachment 3 and the proposed revision to the TMI cyber security regulatory commitment related to the CSP implementation schedule.	Yes. As indicated in the NRC staff's SE dated 7/30/15 (ML15153A282), the licensee's proposed revisions to the commitments were accepted. The elevated commitments should be managed as obligations for which changes will require NRC approval.  The licensee's documentation notes this and that a change would require NRC approval per 10 CFR 50.90.	ML14241A526
Commitment Change Tracking No. 14-01 Exelon Tracking No. 603573-38	NUREG-1928	This commitment involves UFSAR Appendix A, Section A.3.1.2, "Concrete Containment Tendon Prestress Aging Management Program." The commitment revision allows for the revision of the commitment such that it replaces the reference to the 1992 Edition of the ASME Boiler and Pressure Vessel Code, Section XI (ASME B&PV Code) with a reference to the ASME B&PV Code of record in the current revision of the TMI ISI Program Plan, which eliminates the need for future	The licensee's documentation indicates that the NRC will be notified in the next annual Commitment Change Summary Report or UFSAR Update. There is no identified safety concern associated with this change.	N/A

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

Change Tracking No.(s)	Source	Change/Deletion	NRC Notification	ADAMS Accession No.
		commitment revisions based upon code year revisions.		
Commitment Change Tracking No. 14-04 Exelon Tracking No. 1122072-39	IEB 80-15, Possible Loss of Emergency Notification System with LOOP	Commitment Change Tracking No. 14-04 is for the closure of this commitment. The licensee's documentation provided the justification that the original commitment to notify the NRC Operations Center within 1 hour of the discovery of an Emergency Notification System (ENS) extension to be inoperable is now covered by 10 CFR 50.72(b)(3)(xiii). The document also indicates that compliance with 10 CFR 50.72 is provided by Exelon procedure EP-AA-121.	The licensee's documentation indicates that the NRC will be notified in the next annual Commitment Change Summary Report or UFSAR Update.	N/A
Commitment Change Tracking No. 14-08  Exelon Tracking No. 1122072-5710	NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events"  Letter, dated 8/17/05, "30-day Response to NRC Bulletin 2005-02, 'Emergency Preparedness and Response Actions for Security-Based Events' (ML052300145)  NRC SER, dated 12/1/2006 (ML063330535)	Attachment 11 of the licensee letter dated 8/17/05 provided a commitment to revise the Emergency Plan to incorporate drills and exercises based upon terrorist-based events in Bulletin 2005-02 Attachment 6, "Examples of Acceptable Changes to Security-Related Drill and Exercise Program." The licensee's documentation indicated that this commitment was canceled by the licensee in December 2014, with the indication that 10 CFR 50 Appendix E provides the information for the drill frequencies.	The licensee's documentation indicates that the NRC will be notified in the next annual Commitment Change Summary Report or UFSAR update. There is no identified safety concern associated with this change.  The licensee indicated that the changes for the commitment had been incorporated into Rev 24 of EP-AA-1000 and that the required commitment actions, which are now an obligation, is currently contained in Rev 28 of EP-AA-1000, Exelon Nuclear Standardized Radiological Emergency Plan, Section N: Drill and Exercise Program.	N/A
Commitment Change Tracking No. 15-01 (Commitment Change Tracking No. 15-01 is for the closure of this	Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events" and Generic Letter 90-03, "Relaxation of	Generic Letter 83-28 Item 2.1, "Equipment Classification and Vendor Interface (Reactor Trip System Components)," was divided into 2 parts (as described in an NRC SER	The licensee tracked the history and closure of this commitment. The licensee's documentation indicates that the NRC will be notified in the next annual Commitment Change	N/A

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

Change Tracking No.(s)	Source	Change/Deletion	NRC Notification	ADAMS Accession No.
commitment.)  Exelon Tracking No. 1122072-57	Staff Position in Generic Letter 83-28, Item 2.2 Part 2 "Vendor Interface for Safety-Related Components" are applicable to this section.	dated 8/12/81, and later in GL 90-03), with the Vendor Interface portion being subsequently referred to as Part 2 and Item 2.2.	Summary Report or UFSAR Update.  In the NRC SER dated 8/12/81, the NRC accepted the response to Part 1 for TMI but rejected the response to Part 2. GL 83-28 relaxed this requirement. A response was provided by letter dated 10/1/90, and an NRC SER dated 10/12/90, accepted the response to Part 2.	
Exelon Tracking No. 2428693-01	TMI 10 CFR 50.46 30-Day Report  Letter, dated 12/22/2014 (ML14356A342) s. 4/6/15 (ML15097A125)	The original commitment submitted in the 12/22/14 letter indicated that Exelon will perform a full LBLOCA reanalysis for TMI by 3/31/17, and that the effects of fuel pellet thermal conductivity degradation (TCD) will be accounted for by use of a fuel temperature uncertainty adjustment factor based on COPENIC2.  This commitment was superseded by a commitment made in the 3/8/15 letter. The licensee has now committed to completing the full LBLOCA re-analysis within 21 months following NRC issuance of the final SER for BAW-10179, Revision 9, and the licensee also stated that it incorporates by reference the supplement to BAW-10192P-A, Revision 0.	Yes. The NRC evaluation, dated 12/17/15 (ML15306A503), stated the following: "The NRC staff determined that this commitment revision is acceptable as it does not affect the outcome of the NRC staff's review or the licensee's compliance with the regulations."	ML15097A125
Exelon Tracking Nos. 1427154-55-00 involved the E-1 items and 1427154-56-00 involved the E-2 items. These commitments were superseded by Exelon Tracking Nos.	NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi	These commitments are regarding the Seismic Walkdown Deferred Inspections for TMI. Licensee letter RS-12-175/TMI-12-161, dated 11/19/12, provided 2 commitments. In particular, these commitments involved the completion of the deferred walkdown items in Table E-1	Yes. Licensee letter RS-14-032 indicated that Regulatory Commitment Nos. 1 and 2 contained in the 11/19/12 letter, and Regulatory Commitment Nos. 21 and 22 contained in the 9/16/13 letter were complete. This was further discussed in Section A1.1, which	ML13260A083

**TABLE 2**  
**Verification of the Licensee's Program for Managing NRC Commitment Changes (TMI-1)**  
**(See Note 2)**

Change Tracking No.(s)	Source	Change/Deletion	NRC Notification	ADAMS Accession No.
1427154-90-00 and 1427154-91-00.	<p>Accident, dated 3/12/12 (ML12053A340)</p> <p>Licensee letter, dated 11/19/12 (RS-12-175, ML12362A045, Package ML123620050)</p> <p>Licensee letter, dated 9/16/13 (RS-13-213/ RA-13-081/ TMI-13-109, ML13260A083)</p> <p>Licensee letter, dated 3/28/14 (RS-14-032, ML14093A533, Package ML14093A527)</p>	and Table E-2 in the licensee letter dated 11/19/12 and were merged into commitments in Attachment 12 of the licensee letter dated 9/16/13.	indicated that Commitment Nos. 1 and 2 in Enclosure 2 of RS-12-175 were completed (ML14093A533).	

Note 2: The scope of this portion of the audit includes verifying that the licensee has established and implemented appropriate administrative controls for modifying or deleting regulatory commitments made to the NRC. The scope includes commitment changes reported to the NRC and commitment changes not reported to the NRC since the previous audit. See Audit Report Section 2.2 for further details.

**TABLE 3**  
**Review of NRC License Amendments, Relief Requests, and Exemptions (TMI-1)**  
**(See Note 3)**

Application Date (Accession No.)	TAC No.	Description	NRC Letter Date (ADAMS Accession No.)	Safety Evaluation Discusses Regulatory Commitments? (Yes/No)	Audit Results
11/7/12 (ML12313A344) s. 4/7/13 (ML13108A003)	MF0046 MF0047 MF0048	RRs PR-01, PR-02, and VR-02, Associated with the Fifth 10-Year Inservice Test Interval	8/15/13 (ML13227A024)	No. The SE does not discuss regulatory commitments.	No issues.
7/6/12 (ML12202A034)	ME9063	(Fleet) TS 5.3.1/6/3/1 Unit (Facility) Staff Qualifications	Amendment No. 280 6/20/13 (ML13079A372)	No. The SE does not discuss regulatory commitments.	No issues.
10/5/12 (ML12283A252) s. 3/18/13 (ML13078A329)	ME9788	RR-12-01, Examination of Certain Pressurizer Relief Nozzle Welds	8/27/13 (ML13227A007)	No. The SE does not discuss regulatory commitments.	No issues.
10/18/12 (ML12292A584) s. 1/17/13 (ML13018A248) 3/11/13 (ML13071A093)	ME9818	RR-12-02, Installation of a Full Structural Weld Overlay on the Lower Cold Leg Letdown Nozzle Dissimilar Metal Welds and Alloy 600 Safe-End	6/10/13 (ML13134A467)	Yes. As stated in the SE: "The licensee provided the following commitment in the application dated 10/18/12: 'Exelon Generation Company, LLC commits to providing the results of the ultrasonic examination of the Full Structural Weld Overlay on the TMI, Unit 1 lower cold leg letdown nozzle dissimilar metal welds and Alloy 600 safe-end. The results will include: (1) A list of the indications detected, (2) The disposition of all the indications using the standards of ASME Code Cases N-740-2 and N-770-1, (3) The type and, if possible, nature of the indications. Also included in the results will be a discussion of any repairs to the overlay material.' The licensee will provide the results within 30 days after the completion of the last UT examination of weld overlays during the fall 2013 TMI-1, T1R20 refueling outage. The NRC staff reviewed this commitment and finds it acceptable. The NRC staff also concludes that tracking this commitment under the licensee's commitment tracking program is appropriate."  Exelon letter TMI-13-168 (ML13338A431), dated 12/3/13,	No issues.

**TABLE 3**  
**Review of NRC License Amendments, Relief Requests and Exemptions (TMI-1)**  
**(See Note 3)**

Application Date (Accession No.)	TAC No.	Description	NRC Letter Date (ADAMS Accession No.)	Safety Evaluation Discusses Regulatory Commitments? (Yes/No)	Audit Results
				discussed the closeout of the commitment and did not contain new commitments. The letter states: "During the recent TMI, Unit 1 refueling outage, the identified welds were successfully overlaid. Ultrasonic examinations of these overlays did not identify any indications. Additionally, there were no repairs to the overlay material. Accordingly, this commitment is complete."	
10/18/12 (ML12292A585) s. 3/15/13 (ML13074A700)	ME9819	RR VR-01, Proposed Alternative Testing of the Pressurizer Pilot Operated Relief Valve	8/28/13 (ML13232A051)	No. The SE does not discuss regulatory commitments.	No issues.
12/14/12 (ML12353A319) s. 1/31/13 (ML13032A312) s. 8/13/13 (ML13232A235)	MF0424 MF0425	Revision of the Pressure and Temperature Limit Curves and the Low Temperature Overpressure Protection Limits)	Amendment No. 281 12/13/13 (ML13325A023) Exemption 12/13/13 (ML13324A086, ML13324A089)	No. The SE does not discuss regulatory commitments.	No issues.

**TABLE 3**  
**Review of NRC License Amendments, Relief Requests and Exemptions (TMI-1)**  
**(See Note 3)**

Application Date (Accession No.)	TAC No.	Description	NRC Letter Date (ADAMS Accession No.)	Safety Evaluation Discusses Regulatory Commitments? (Yes/No)	Audit Results
2/4/13 (ML13037A051) s. 3/24/14 (ML14084A270) 9/26/14 (ML14269A351)	MF0628	Delete Reporting Requirements	Amendment No. 284 12/30/14 (ML14330A300)	Yes. The 9/26/14 letter has the following commitment. "Incorporate a description of the Periodic Leak Reduction Program into the licensing basis by revising UFSAR Section 6.4, "Engineered Safeguards Leakage and Radiation Considerations." The SE states the following: "Based on the NRC staff's review, the staff finds that the licensee's current proposed amendment only requests the deletion of the Annual Reporting requirement for the NUREG-0737-related Periodic Leak Reduction program and that the licensee's commitment to the program as was stated by the licensee in its 1/23/81, response to the staff's 50.54(f) letter mentioned above, is not affected by the proposed change. Furthermore, according to the licensee's response to the RAI, the program will be reflected in its licensing basis by revising UFSAR Section 6.4, 'Engineered Safeguards Leakage and Radiation Considerations.' In addition, the licensee stated that the requirements for the program are currently addressed in its leakage surveillance procedures."	No issues.
2/27/13 (ML13059A498) s. 6/24/13 (ML13176A143) 12/12/13 (ML13351A410) 4/28/14 (ML14119A289)	MF4034	RR to Use Code Case N-786 for the Repair of ASME Class 2 & 3 Piping	7/31/14 (ML14175B593)	No. There were no regulatory commitments contained in the licensee's submittals. The licensee submittals indicated that there were no regulatory commitments but it incorrectly refers to requirements of the relief request as a commitment. The NRC staff discussed this with the licensee during the onsite portion of the audit to confirm that the licensee was aware of the need for this clarification in its submittals as well as NRC expectations regarding commitments and obligations identification and management.	No issues.
9/25/13 (ML13270A197)	MF2651	RR to Use a Later Edition and Addenda of the ASME B&PV Code, Section XI	7/18/14 (ML14176A748)	No. The SE does not discuss regulatory commitments.	No issues.

**TABLE 3**  
**Review of NRC License Amendments, Relief Requests and Exemptions (TMI-1)**  
**(See Note 3)**

<b>Application Date (Accession No.)</b>	<b>TAC No.</b>	<b>Description</b>	<b>NRC Letter Date (ADAMS Accession No.)</b>	<b>Safety Evaluation Discusses Regulatory Commitments? (Yes/No)</b>	<b>Audit Results</b>
10/30/13 (ML13304B168) s. 6/13/14 (ML14167A226)	MF3009 MF3010	Emergency Response Organization (ERO) Requalification Training Frequency (Fleet)	Amendment No. 283 12/24/14 (ML14226A940)	No. The SE does not discuss regulatory commitments.	<b>No issues.</b>
5/7/14 (ML14127A424)	MF4110	TSTF-522 Revise Ventilation System SRs	Amendment No. 282 10/14/14 (ML14240A348)	No. The SE does not discuss regulatory commitments.	<b>No issues.</b>
7/10/14 (ML14191A059) s. 5/7/15 (ML15127A537)	MF4435	TSTF-523 Revise TS & SRs for GL-2008-01, Managing Gas Accumulation	Amendment No. 285 6/30/15 (ML15121A589)	The SE does not discuss commitments, but the submittal satisfies a licensee commitment as discussed in Table 1.	<b>No issues.</b>
10/30/14 (ML14304A083) s. 6/10/15 (ML15161A333)	MF5108	Modify RCS Pressure Isolation Valve TS Allowable Limits	Amendment No. 286 7/28/15 (ML15090A584)	There were no regulatory commitments contained in the licensee's submittal, but the SE references a commitment as background information.  The SE indicates that TMI-1 responded to Generic Letter 80-14 and committed valves CF-VF5A/B and DH-V22A/B to specified maximum allowable leakage rate criteria. As noted in the SE, this leakage criteria was revised. The SE states the following: "The NRC staff completed a review of the licensee's system configuration, installed components, inservice testing program plan, and the maintenance history. The review confirms that pressure relief valves are installed and are capable of meeting the revised leakage criteria. The NRC staff also confirmed that the valves are qualified and tested to the requirements of the ASME OM Code and have an acceptable maintenance leakage history."	<b>No issues.</b>
8/29/14 (non-proprietary) (ML14241A526) (proprietary) (ML14241A525)	MF4749	Fleet Cyber Security Milestone 8	Amendment No. 288 7/30/15 (ML15153A282)	By application dated 8/29/14 (ADAMS Accession No. ML14241A526), the licensee proposed changes that would revise the date (from 12/31/15 to 12/31/17) of CSP implementation schedules for Milestone 8 and the existing license conditions in the facility operating licenses for several Exelon plants, including TMI. Attachments 3 and 4 of the application contained revisions to regulatory	<b>No issues.</b>

**TABLE 3**  
**Review of NRC License Amendments, Relief Requests and Exemptions (TMI-1)**  
**(See Note 3)**

Application Date (Accession No.)	TAC No.	Description	NRC Letter Date (ADAMS Accession No.)	Safety Evaluation Discusses Regulatory Commitments? (Yes/No)	Audit Results
				<p>commitments for TMI that are regarding CSP implementation schedule and implementation of Safety, Security, and Emergency Planning (SSEP) functions.</p> <p>As indicated in the NRC staff's SE (dated 7/30/15), the licensee's proposed changes to the commitments were approved. Also, as stated in Section 3.3 of the SE: "The CSP implementation schedules are obligations under 10 CFR 73.54 and the associated amendments approving the CSP for each facility. As such, changes to the CSP implementation schedules will require NRC approval in accordance with 10 CFR 50.90. Therefore, the licensee should not be managing the CSP implementation schedules as regulatory commitments."</p> <p>The licensee's documentation notes this and that a change would require NRC approval per 10 CFR 50.90.</p>	
5/30/14 (ML14164A054) s. 3/2/15 (ML15071A118)	MF4250	Fleet – EAL Scheme re NEI 99-01, Rev. 6	Amendment No. 287 7/28/15 (ML15141A058)	No. The SE does not discuss regulatory commitments.	No issues.
9/19/14 (ML14262A002) s. 11/19/14 (ML14328A189)	MF4873	RR-14-01 Concerning Alternative Root Mean Square Depth Sizing Requirements	9/15/15 (ML15163A249)	Yes. The SE discusses a commitment that was elevated to a requirement of the relief request. It was imposed as part of the alternative in accordance with 10 CFR 50.55a(g)(6)(i).	No issues.
7/23/15 (ML15204A843) s. 7/28/15 (ML15209A960) s. 8/18/15 ML15230A533 s. 8/25/15 (ML15237A417)	MF6504	Temporary Restoration of the Borated Water Storage Tank Cleanup and Recirculation Operation	Amendment No. 289 10/1/15 (ML15225A158)	No. The SE does not discuss regulatory commitments.	No issues.

Note 3: The scope of this portion of the audit includes a review of the license amendments, relief requests, and exemptions issued since the previous TMI-1 audit. The intent of the review is to determine the extent to which commitments have been misapplied (e.g., commitment relied on by NRC staff rather than elevating it to an obligation or incorporating the commitment into a mandated licensing basis document). See Audit Report Section 2.3 for more details.

B. Hanson

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audit, the NRC staff concludes that the licensee has implemented NRC commitments on a timely basis and the licensee has implemented an effective program for managing NRC commitment changes. Details of the audit are set forth in the enclosed audit report.

Sincerely,

*/RA/*

Robert L. Gladney, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:

Audit Report

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**ADAMS Accession No.: ML15338A193**

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DATE	2/29/2016	2/29/2016	4/25/2016	4/26/2016

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