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Date: Friday, March 19, 2004 4:26PM
Subject: Guidance for Self-Assessment of Circuit Failure Issues - Draft Rev. G

Mr. John Hannon
Chief, Plant Systems Branch
Office of Nuclear Reactor Regulation
Mail Stop O11-A11
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

PROJECT NUMBER: 689

As discussed in our letter of March 4, 2004, attached for your review is Draft Revision G of NEI 04-06, Guidance for Self-Assessment of Circuit Failure Issues. We would like to schedule a meeting with NRC in early April to obtain preliminary staff views on assuring consistency of NEI 04-06 with NRC goals for the resumed associated circuit inspections.

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Attachment

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NUCLEAR ENERGY INSTITUTE

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March 19, 2004

Mr. John Hannon
Chief, Plant Systems Branch
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Dear Mr. Hannon:

As discussed in our letter of March 4, 2004, attached for your review is Draft Revision G of NEI 04-06, *Guidance for Self-Assessment of Circuit Failure Issues*. We would like to schedule a meeting with NRC in early April to obtain preliminary staff views on assuring consistency of NEI 04-06 with NRC goals for the resumed associated circuit inspections.

We plan to provide NEI 04-06 to the industry for use in conducting self-assessments prior to the NRC's resuming associated circuit inspections. Some licensees will have inspections shortly after the end of the limited "grace period" referenced in your letter of February 12, 2004. We would also like to use it in the pilot plant self-assessment beginning May 3, 2004, and later pilots currently being planned.

Please review this information and provide feedback at your earliest opportunity on whether the document is congruent with your inspection plans. We believe a meeting on April 6, as discussed informally with NRC staff, will be satisfactory for this purpose. A more thorough review with comments can be provided later, and the document can be revised accordingly.

NEI 04-06 is intended to be consistent with the criteria in Regulatory Information Summary 2004-03, issued recently. The self-assessment plan is laid out in four phases:

- Phase 0: Preparation and selection of fire areas to be reviewed
- Phase I: Identify circuits and credible fire scenarios
- Phase II: Determine potentially risk-significant circuit failures using the RIS criteria

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- Phase III: Determine risk significance of findings and any additional action to be taken to address findings

We are recommending in NEI 04-06 that findings that are clearly potential licensing basis issues be clearly distinguished from those beyond the licensing basis. All risk-significant issues should be addressed appropriately through plant Corrective Action Programs.

We look forward to your response. If you have any questions, please contact me (202-739-8080; am@nei.org) or Fred Emerson (202-739-8086; fae@nei.org).

Sincerely,



Alex Marion

Attachment

c: NRC Document Control Desk
Mr. Sunil Weerakkody, NRC
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