



NUCLEAR ENERGY INSTITUTE

**Biff Bradley**  
DIRECTOR  
RISK ASSESSMENT  
NUCLEAR GENERATION DIVISION

October 1, 2009

Mr. Timothy J. Kobetz  
Chief, Reactor Inspection Branch  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Proposed Revision to Language Regarding Scoping of Equipment Used in Emergency Operating Procedure (EOPs) in NUMARC 93-01, *"Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"*.

**Project Number: 689**

Dear Mr. Kobetz:

NEI's May 4, 2007 letter to the NRC proposed revisions to NUMARC 93-01, which provides implementation guidance for 10 CFR 50.65, the maintenance rule. The proposed revisions sought to address two areas; monitoring of unavailability during shutdown, and scoping of non-safety related structures, systems and components (SSCs) used in emergency operating procedures (EOPs). Subsequent to the above letter, there has been additional public interaction with NRC staff and stakeholders. There has also been continued inspection and enforcement activity relative to the EOP scoping issue. In an effort to clarify inspection considerations and move forward with this aspect of guidance revision, we wish to propose a new version of the EOP scoping criteria guidance for NRC's consideration.

The attachment provides proposed revised wording for Section 8.2.1.3 of NUMARC 93-01 Revision 2. (Note: This is the revision currently addressed by NRC Regulatory Guide 1.160, even though proposed revisions 3 and 4 have previously been forwarded for NRC consideration.) We propose that this language replace the EOP scoping language provided in our May 4, 2007 letter. We respectfully request that NRC review this information and consider a public meeting with stakeholders to discuss the guidance further. We are also working on industry data collection to substantiate the basis for elimination of shutdown unavailability monitoring, and will be able to

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discuss the status of this effort further at the public meeting. We believe this effort will facilitate NRC consideration of the elimination of this monitoring, as proposed in our May 4, 2007 letter.

We appreciate NRC's consideration of this matter. If you have any questions regarding this proposed revised language or wish to discuss the scheduling of a public meeting, please feel free to contact me at 202.739.8083; [reb@nei.org](mailto:reb@nei.org) or Victoria Andersen at 202.739.8101; [vka@nei.org](mailto:vka@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a large, stylized flourish that loops back to the left.

Biff Bradley

Attachment

c: Mr. Paul Bonnett, NRR/ADRO/DIRS/IR, NRC  
Mr. Stephen J. Vaughn, NRR/ADRO/DIRS/IR, NRC  
NRC Document Control Desk