

# RIRP Pilot Project Problem Statement

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## PROBLEM STATEMENT

A "problem statement" is a detailed statement of the situation or circumstances that give rise to a regulatory issue. It should convey to a knowledgeable reader the nature and extent of a potential deficiency or non-compliance. The industry RIRP Team and the counterpart NRC team independently prepare draft problem statements for further discussion and consolidation into a mutual problem statement.

### NRC Problem Statement (16sep09):

1. Cables within the scope of Maintenance Rule are subjected to environments they are not designed or qualified for.
2. Cables within the scope of Maintenance Rule are not being monitored by the licensees to demonstrate that the cables can perform their design functions when called upon.

### Industry Problem Statement (02oct09):

1. The NRC and Industry disagree on whether or not cable circuits were designed, procured, and installed in environments for which they were designed.
2. Experience indicates that some inaccessible or underground power cable circuits are susceptible to premature deterioration; thus, they may not be performing their design expectations.

### Proposed Mutual Problem Statement (07oct09):

- If subjected to an adverse localized environment, inaccessible or underground power cable circuits within the scope of the Generic Letter (GL) 2007-01 may not perform their design functions when called upon.