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.

- **The environment of inaccessible or underground power cable circuits within the scope of the Generic Letter (GL) 2007-01 may cause them not to perform their design function.**

Problem Closure Statement:

- A "closure plan" is a general statement of all actions necessary and sufficient to close a regulatory issue. It identifies the implementation and documentation options available to organizations within the issue's scope of applicability. Affected organizations adapt the closure plan to accommodate the plant-specific design and licensing bases.
- Develop and gain endorsement of an assessment strategy for inaccessible or underground power cable circuits within the scope of Generic Letter (GL) 2007-01 that will determine and initiate appropriate actions to demonstrate that each cable circuit can perform its intended design function in an environment in which it is subjected as long as the cable circuit remains in service.

Success Statement:

Five meetings
Agreed generic issue
Involved management, technical, design, licensing, Maintenance Rule, Policy & Rulemaking
Agreement of Problem Statement
Agreement of Closure Plan Statement
Established path forward:
- Milestone schedule
- Responsibilities
- Deliverables

Benefits of being in RIRP:
- Understanding of differences of regulatory position
  - Terminology differences on same words
- Improved time to resolution
- Durable guidance
- Endorsed program guidance
- Program implementation resolves inspection issues
- Centralization of issue
- Issue brought to decision makers

Milestones:

Estimated Date	Deliverable	Status
Feb10	Status report to Industry	Closed
03Feb10	Results to Maintenance Rule meeting	Closed
25Feb10	Status report to NSIAC	Closed
Feb10	Status report to NRC	Closed
Feb10	NRC NuReg/CR-7000	Closed
17Feb10	EPRI Cable Technical Advisory Group meeting	Closed
08apr10	Lessons Learned public meeting	Closed; NEI 10-06 issued
May10	Industry comments on NuReg/CR-7000	Pending
30Jun10	EPRI MV Program Guide issued	Closed; 04jun10
30Jul10	EPRI LV Program Guide issued	Closed; 04jun10
Jul10	Meeting for NRC exception/endorsement of MV Guide	
Sep10	NRC endorsement of Guide	
Dec10	RegGuide	
Jan11	Delta resolution of Guides & RegGuide	