NUCLEAR ENERGY INSTITUTE

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September 10, 2010

Mr. Timothy J. McGinty
Director, Division of Policy and Rulemaking
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Regulatory Issues Resolution Protocol: Inaccessible or Underground Cable Systems Pilot Project

Project Number: 689

Dear Mr. McGinty:

The Nuclear Energy Institute (NEI),[1] on behalf of the nuclear energy industry, is providing this letter to address closure of the pilot effort for Regulatory Issues Resolution Protocol: Inaccessible or Underground Cable Systems. The cable pilot addressed the problem statement: "The environment of inaccessible or underground power cable circuits within the scope of Generic Letter 2007-01 may cause them not to perform their design function". The goal of the effort was to identify and implement the actions necessary to ensure safe and reliable cable performance. We believe that the resultant actions taken by the industry and the NRC will provide an appropriate level of assurance that the cables will perform their intended safety function.

The cable pilot was initiated on July 30, 2009, and there have been six public meetings held over the course of the following year. These meetings helped identify the appropriate set of actions needed to achieve the cable pilot goal. The following actions are being taken to close-out the cable pilot:

Near term actions for the industry: The industry will continue to inspect underground manholes that contain cables. In the event that the as-found environment is inconsistent with the environment for which the cables were designed, the deficiency should be documented in the corrective action program and actions will be taken to restore the environment or to confirm that the cable was designed for the as-found condition in accordance with 10 CFR Part 50 Appendix B Criterion III, Design Control.

[1] NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

Additionally the industry will continue to manage power cables through monitoring performance of trains and systems pursuant to 10 CFR 50.65(a)(2) or through monitoring plant level performance where appropriate. Inspection and surveillance programs will be used to confirm the cable is performing its intended safety function. This performance-base risk-informed approach is consistent with the Maintenance Rule.

The long term actions for the industry: The industry will manage power cables by implementing cable aging management program guidelines released by EPRI in June 2010: EPRI 1020804, "Aging Management Program Development Guidance for AC and DC Low-Voltage Power Cable Systems for Nuclear Power Plants," and EPRI 1020805, "Aging Management Program Guidance for Medium-Voltage Cable Systems for Nuclear Power Plants". Consistent with NUREG 1801, Section XI.E3 “Inaccessible Power Cables Not Subject to 10 CFR 50.49 Environmental Qualifications Requirements Generic Aging Lessons Learned”, the program guides describe a cable aging management program which provides reasonable assurance that the intended functions of inaccessible or underground power cables that are exposed to wetting or submergence are maintained consistent with the current licensing basis and licensing basis under periods of extended operation.

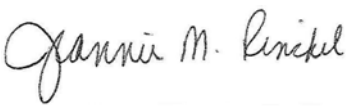
Ongoing NRC activities: NRC will continue to inspect cables subject to flooding per Inspection Procedure 71111.06 guidance and take appropriate regulatory actions for licensees who are not in compliance with regulatory requirements.

NEI communications to the industry on this subject have reinforced the importance of licensee support of ongoing inspections and have stressed the importance of implementation of the EPRI cable aging management guidance.

In summary, the combination of the above outlined actions by the industry and the inspection activities by the NRC will satisfy the goal to have safe and reliable power cable performance and will provide reasonable assurance that the power cables will perform the intended safety function.

Thank you for your active participation in the cable pilot. I look forward to an additional RIRP pilot to continue our efforts to refine the Regulatory Issues Resolution Protocol and meet our shared goal of safety-focused, effective, and efficient problem resolution. If you have any questions, please feel free to contact me at (202) 739-8095; jmr@nei.org or Gordon Clefton at (202) 739-8086; gac@nei.org.

Sincerely,



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