

November 3, 2010

Ms. Jeannie M. Rinckel, Executive Director
Regulatory Affairs
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, N.W., Suite 400
Washington, D.C. 20006-3708

SUBJECT: Inaccessible or Underground Cable Systems Pilot Project

Dear Ms. Rinckel:

On behalf of the Nuclear Regulatory Commission (NRC), I am responding to the Nuclear Energy Institute's (NEI) letter from you, dated September 10, 2010, concerning the closure of the Inaccessible or Underground Cable Systems Pilot Project (ML102570716). The NRC agrees that the cable pilot is considered closed within the constraints of the Regulatory Issue Resolution Protocol (RIRP). However, the NRC will continue its inspection efforts to assure full compliance is achieved and provides the following feedback concerning the topics discussed in your letter.

Concerning the "near term actions for the industry" identified in your letter, the industry initiative to "inspect underground manholes" and "manage power cables through monitoring" does not address all of the NRC staff concerns. The NRC believes that the industry inspection effort should include all inaccessible power cables, not only underground manholes, and that if cables have been exposed to conditions for which they are not designed, licensees must demonstrate through adequate testing or a condition monitoring program, reasonable assurance that the cables can perform their intended design function and are operable for the licensed operating term.

With regard to the "long term actions for the industry" identified in your letter, the NRC believes that implementation of a cables monitoring program that is consistent and complies with the Maintenance Rule will help ensure the long-term performance of inaccessible cables. NRC Draft Regulatory Guide, DG-1240, "Condition Monitoring Program for Electric Cables Used in Nuclear Power Plants," describes a method that the staff considers acceptable for condition monitoring for electric cables for nuclear power plants. Implementing an NRC approved cables monitoring program and ensuring all cables are maintained in an environment for which they are designed, will provide the reasonable assurance that the intended functions of inaccessible or underground power cables are maintained consistent with the current licensing basis. Your letter stated that the long term actions for the industry to resolve this issue are to implement the cable aging management program guidelines released by the Electric Power Research Institute (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" and the NRC's GALL Aging Management Program, NUREG 1801, Section XI.E3 "Inaccessible Power Cables Not Subject to 10 CFR 50.49 Environmental Qualifications Requirements Generic Aging Lessons Learned." Since the NRC has neither reviewed nor

endorsed these two EPRI documents, we cannot conclude that implementing the EPRI programs will assure long-term performance of inaccessible cables. Also, the Generic Aging Lessons Learned (GALL) aging management program which is applicable to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54 is to be used in addition to the current licensing basis requirements under 10 CFR Part 50 during the plants' period of extended operation.

The NRC agrees that the combination of the industry initiative to inspect for proper cables environment, the implementation of a cables monitoring program by each licensee, and routine NRC inspections will satisfy the goal to have safe and reliable power cable performance and will provide reasonable assurance that the power cables will perform their intended safety function. The NRC considers an important lesson learned from the inaccessible cables pilot is that much closer alignment between the problem statement, expected outcomes, and actions for future activities must be considered and established early in the process and a part of any resolution. This degree of early alignment should ensure that mutual expectations of issue resolution will lead to a timely and successful issue closure. The NRC looks forward to including this lesson learned in any future RIRP managed project. During the October 15, 2010, public meeting, the NRC offered the Boiling Water Reactor Suppression Pool Cooling Water Hammer issue as a potential next pilot. Understanding that industry intends to process potential issues through the Licensing Action Task Force before selecting one for the next pilot, I request that NEI strive for a speedy decision to allow the NRC and industry to have a "next pilot" kick-off meeting before the end of the calendar year. The next RIRP pilot should allow us to continue our efforts to refine the RIRP 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 301-415-1653; Tim.McGinty@nrc.gov or Thomas Blount at 301-415-5710; Tom.Blount@nrc.gov.

Sincerely,

/RA/

Timothy J. McGinty, Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 689

cc: T. Pietrangelo, NEI
D. Walters, NEI
G. Clepton, NEI

endorsed these two EPRI documents, we cannot conclude that implementing the EPRI programs will assure long-term performance of inaccessible cables. Also, the Generic Aging Lessons Learned (GALL) aging management program which is applicable to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54 is to be used in addition to the current licensing basis requirements under 10 CFR Part 50 during the plants' period of extended operation.

The NRC agrees that the combination of the industry initiative to inspect for proper cables environment, the implementation of a cables monitoring program by each licensee, and routine NRC inspections will satisfy the goal to have safe and reliable power cable performance and will provide reasonable assurance that the power cables will perform their intended safety function. The NRC considers an important lesson learned from the inaccessible cables pilot is that much closer alignment between the problem statement, expected outcomes, and actions for future activities must be considered and established early in the process and a part of any resolution. This degree of early alignment should ensure that mutual expectations of issue resolution will lead to a timely and successful issue closure. The NRC looks forward to including this lesson learned in any future RIRP managed project. During the October 15, 2010, public meeting, the NRC offered the Boiling Water Reactor Suppression Pool Cooling Water Hammer issue as a potential next pilot. Understanding that industry intends to process potential issues through the Licensing Action Task Force before selecting one for the next pilot, I request that NEI strive for a speedy decision to allow the NRC and industry to have a "next pilot" kick-off meeting before the end of the calendar year. The next RIRP pilot should allow us to continue our efforts to refine the RIRP 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 301-415-1653; Tim.McGinty@nrc.gov or Thomas Blount at 301-415-5710; Tom.Blount@nrc.gov.

Sincerely,

/RA/

Timothy J. McGinty, Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 689

cc: T. Pietrangelo, NEI
D. Walters, NEI
G. Clepton, NEI

DISTRIBUTION:

PUBLIC RidsNrrDpr RidsNrrOd RidsNrrAdro RidsNrrAdes RidsNrrDprPgcb
RidsEdoMailCenter RidsNrrMailCenter SSTuchell

ADAMS Accession No: ML102660008

OFFICE	PM: DPR/PLPB	LA: DPR/ PLPB	BC: DE/EEB	BC: DPR/PLPB
NAME	SStuchell	EHylton	RMathew	JJolicoeur
DATE	09/28/10	10/01/10	10/4/10	10/4/10
OFFICE	DDD: NRR/DPR	DD:NRR/DORL	DD: NRR/DE	DD: NRR/DPR
NAME	TBlount	JGitter	PHiland	TMcGinty
DATE	10/13/10	10/ 13 /10	10/ 18 /10	11/3/10

OFFICIAL RECORD COPY