



NUCLEAR ENERGY INSTITUTE

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January 4, 2011

Mr. Frederick D. Brown
Director, Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Revision 4 to NUMARC 93-01, *Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants*

Project Number: 689

Dear Mr. Brown:

Attached for NRC review and endorsement is Revision 4 to NUMARC 93-01, *Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants*. This document provides industry guidance for addressing the Maintenance Rule (10 CFR 50.65). Two copies of this document are provided: Enclosure 1 is the final version of NUMARC 93-01, Revision 4 and Enclosure 2 includes a redline-strikeout version of the document highlighting the revisions.

Changes have been made in three major areas in this revision:

- First, this revision incorporates new guidance regarding consideration of risk from internal fires in Maintenance Rule (a)(4) risk assessments. This guidance discusses methods licensees can use to identify equipment which is important to mitigation of risk of core damage from fire initiators, describes approaches to developing and implementing risk management actions as appropriate, and discusses optimal organizational communication for implementation of the guidance.
- Second, guidance on scoping of equipment into the Maintenance Rule based on inclusion in the Emergency Operating Procedures (EOPs) has been extensively revised based on discussions with the industry and the NRC staff. This revised language clarifies expectations for inclusion of equipment in the scope of the Maintenance Rule based on the contents of the plant EOPs.

- Third, the definition of unavailability has been modified to better align with that used in the Reactor Oversight Process. Specifically, the definition has been modified to note that evolutions or surveillance tests that result in less than 15 minutes of unavailable hours per train at a time need not be counted as unavailable hours.

Additionally, minor changes have been made to address regulatory clarifications made in Revision 2 of Regulatory Guide 1.160, *Monitoring the Effectiveness of Maintenance at Nuclear Power Plants*, which endorses the majority of NUMARC 93-01.¹ The intent of these changes is to support a more streamlined endorsement process.

In development of this revision, the industry has evaluated the specific efforts necessary to ensure effective implementation of these changes, particularly those associated with consideration of fire risk in (a)(4) assessments. Some of these efforts, such as conduct of tabletop pilots of the revised guidance for implementation of (a)(4), are underway. While the industry is confident that this portion of the revision can be effectively implemented throughout the fleet, a deliberate, measured approach with a carefully-planned schedule for piloting and implementation is necessary to achieve effective implementation. The industry has developed a project plan for piloting and implementation of this new guidance on consideration of fire risk in (a)(4) assessments, and proposes the following schedule.

Activity Supporting Implementation	Timeframe
Tabletop pilots	Summer/Fall 2010
Submit NUMARC 93-01 revision to NRC for endorsement	January 2011
Industry workshop based on tabletop results	June 2011
Full-scope pilots	Summer/Fall 2011
Issuance of RG 1.160, Revision 3 (estimated)	December 2011
Industry workshop based on full-scope pilots	May 2012
RG 1.160, Revision 3 Implementation date	December 2013

As noted in the above table, there are numerous efforts needed to support implementation of the new guidance on consideration of fire risk in (a)(4) assessments; it is anticipated that the NRC will also need ample time to develop inspection guidance and discuss implementation with the staff to ensure that the new guidance is uniformly applied throughout the fleet. The industry therefore proposes that December 1, 2013, be identified as the implementation date for Regulatory Guide

¹ Regulatory Guide 1.160 currently endorses all portions of NUMARC 93-01, with the exception of Section 11, which gives guidance for implementation of paragraph (a)(4) of the Maintenance Rule. Section 11 is currently endorsed in Regulatory Guide 1.182, *Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants*; it is NEI's understanding that the Regulatory Guide 1.160, Revision 3 will endorse NUMARC 93-01, Revision 4, in its entirety and Regulatory 1.182 will be sunset.

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1.160, Revision 3, and that this implementation date be explicitly identified in Regulatory Guide 1.160, Revision 3, when it is issued.

The industry would like to discuss this revision of NUMARC 93-01 with the NRC at a public meeting in early 2011 to facilitate an efficient endorsement and implementation process. Please contact me or Victoria Anderson regarding scheduling of this public meeting, and please also contact us with any questions about the enclosed document.

If you have any questions or require additional information, please contact me at 202.739.8083; reb@nei.org or Victoria Anderson at 202.739.8101; 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

Attachments

c: Mr. Jeremy S. Bowen, NRR/DIRS/IRIB, NRC
Mr. Michael C. Cheok, NRR/DIRS, NRC
Mr. Tim J. Kobetz, NRR/DIRS/IRIB, NRC
Mr. Stephen J. Vaughn, NRR/DIRS/IPAB, NRC