

March 2, 2011

Mr. Biff Bradley
Director, Risk Assessment
Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

Dear Mr. Bradley:

In your letter dated January 4, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML110050224), the Nuclear Energy Institute (NEI) provided Revision 4 to NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" (ADAMS Accession No. ML110050234) for review and endorsement by the NRC.

The NRC staff has performed a review of Revision 4 to NUMARC 93-01. At this time, the staff agrees that the document provides adequate guidance for addressing the requirements of the maintenance rule and is considering formal endorsement in a revision to Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

During the review, a few editorial questions/comments were identified:

- Section 11.3.4.3, Page 54: The first two paragraphs on page 54 reference other sections of NUMARC 93-01 by stating, "See further discussion on risk management actions below" and "see below for further discussion of limitations on use of quantitative techniques." It appears that sections 11.3.7.5 and 11.3.7.3 are being referenced, respectively; however, this is not clear based on the words in the document itself.
- Section 11.3.6, Page 55: Consideration number 1 states that, "The scope of initiators to be considered in the assessment for shutdown conditions is limited to internal events." Based on the location of this guidance within the document, it appears that the considerations provided in section 11.3.4.2 must also be accounted for (similar to the noted exception in section 11.3.3 on page 49); however, this is not clear based on the words in the document itself.
- Section 11.3.7.5, Page 65: The first paragraph references another section of NUMARC 93-01 by stating, "If the above evaluation indicates risk management actions are appropriate, the following actions should be considered . . ." It appears that section 11.3.4.3 is being referenced; however, this is not clear based on the words in the document itself.

Mr. B. Bradley

- 2 -

- Section 11.3.7.5, Page 65: Paragraph 1. *Primary Action* references section 11.3.7.3 of NUMARC 93-01. However, based on the context of the information, it appears that the correct reference is section 11.3.7.4.

A public meeting is tentatively being scheduled for late March 2011 to discuss the details of the document and the implementation plan. A public meeting notice will be published separately. The NRC staff is providing these editorial questions/comments in advance of the public meeting in order to facilitate discussion at the meeting and to expedite formal endorsement of the document.

Please contact me at 301-415-1932 or Timothy.Kobetz@nrc.gov, or Jeremy Bowen at 301-415-3471 or Jeremy.Bowen@nrc.gov if you have any questions.

Sincerely,

/RA/

Timothy J. Kobetz, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

Mr. B. Bradley

- 2 -

- Section 11.3.7.5, Page 65: Paragraph 1. *Primary Action* references section 11.3.7.3 of NUMARC 93-01. However, based on the context of the information, it appears that the correct reference is section 11.3.7.4.

A public meeting is tentatively being scheduled for late March 2011 to discuss the details of the document and the implementation plan. A public meeting notice will be published separately. The NRC staff is providing these editorial questions/comments in advance of the public meeting in order to facilitate discussion at the meeting and to expedite formal endorsement of the document.

Please contact me at 301-415-1932 or Timothy.Kobetz@nrc.gov, or Jeremy Bowen at 301-415-3471 or Jeremy.Bowen@nrc.gov if you have any questions.

Sincerely,

/RA/

Timothy J. Kobetz, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

DISTRIBUTION

PUBLIC

FBrown

TKobetz

RidsNrrDirslrib

JBowen

SVaughn

ADAMS Accession No.: ML110600802

OFFICE	NRR/DIRS/IRIB	BC:NRR/DIRS/IRIB
Name	JBowen	TKobetz
Date	3/2/2011	3/2/2011

OFFICIAL RECORD COPY