



NUCLEAR ENERGY INSTITUTE

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March 29, 2011

Mr. Sheldon D. Stuchell
Sr. Project Manager
Division of Policy & Rulemaking
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Information to Support Proposed Revision 3 to NUMARC 91-04, *Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J*

Project Number: 689

Dear Mr. Stuchell:

Please find the following information in support of our request for NRC approval of Revision 3 to NUMARC 91-04.

Attachment 1 responds to a December 3, 2009, NRC request for additional information (RAI). In addition, in response to an NRC email of September 30, 2010, documenting a conference call of September 29, 2010, this document also includes references to RG-1.163, DG-1220, and the Standard Technical Specifications as applicable to the local leak rate testing (LLRT) "grace period" for extension of Type C testing intervals. Responses made to comments made during a conference call conducted on December 15, 2010, are also included.

Attachment 2 provides an interim report on a project initiated by EPRI to collect and analyze recent (since 1996) Type C local leak rate testing (LLRT) performance data. The data and analysis is intended to enable identification of good practices, support improved performance, and to reduce the uncertainty in Type C LLRT data referred to in NRC documents. This interim report provides information on the leak-tight performance of Type C containment isolation valves tested on extended intervals in accordance with NEI 94-01 for the period of 1996 to 2010.

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Attachment 3 provides a proposed revision 3 to NUMARC 91-04, *Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J*. Attachment 3 is a line-in, line-out version. This revision restores the 75-month interval for Type C testing, and extends considerations for extended interval use to include Type C testing.

We believe we have been responsive to NRC requests to document the basis for restoring the 75-month Type C test interval, and we request NRC approval of the attached revision 3 to NUMARC 94-01. If you have any questions or require additional information, please contact me at 202.739.8083, reb@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Biff", followed by a large, stylized flourish that extends to the right.

Biff Bradley

Attachments

c: NRC Document Control Desk