

**Questions for withdrawal of Regulatory Guide 1.182,
“Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants”**

(1) What did the Regulatory Guide support?

Regulatory Guide 1.182 was used as a companion guide to Regulatory Guide 1.160, Revision 2, “Monitoring the Effectiveness of Maintenance at Nuclear Power Plants.”

(2) What was the purpose of the Regulatory Guide? (Discuss the why the regulatory guide was originally developed.)

10 CFR 50.65 contains requirements for monitoring the effectiveness of maintenance at nuclear power plants. RG 1.160, Revision 2, was created in March 1997 and provides methods that are acceptable to the NRC staff for complying with the provisions of 10 CFR 50.65 that were in effect in 1997. In 1999, the NRC amended 10 CFR 50.65 to include a provision such that prior to conducting maintenance, the licensee shall assess and manage the increase in risk that may result from the proposed maintenance activities. Rather than revise RG 1.160, the NRC created RG 1.182 to address the new provisions of 10 CFR 50.65. RG 1.182 provides methods that are acceptable to the NRC staff for implementing the provisions of 10 CFR 50.65 associated with managing and assessing the risk of maintenance activities.

(3) How was the Regulatory Guide used?

RG 1.182 provides methods that are acceptable to the NRC staff for implementing the provisions of 10 CFR 50.65 associated with managing and assessing the risk of maintenance activities. It is used by both licensees and NRC staff.

(4) Why is the Regulatory Guide no longer needed? (Reference any document that supersedes the regulatory guide.)

RG 1.160, Revision 3, was created in May 2012 and provides methods that are acceptable to the NRC staff for complying with the current provisions of 10 CFR 50.65. As a result, RG 1.160, Revision 3 also provides methods that are acceptable to the NRC staff for implementing the provisions of 10 CFR 50.65 associated with managing and assessing the risk of maintenance activities. Therefore, RG 1.182 is no longer needed.

(5) What guidance is available once the Regulatory Guide is removed?

RG 1.160, Revision 3 is available.

(6) What are the possible “ripple effects” on other documents? (Identify documents that could be affected by the withdrawal.)

No other documents / ripple effects identified during numerous meetings with external and internal stakeholders.

- (7) What is the basis for believing that no guidance similar to that in the Regulatory Guide will ever be needed?** (Verify that no licensee would be adversely affected by the withdrawal of the regulatory guide.)

The guidance found in RG 1.182 will be needed, however, the guidance is now contained in RG 1.160, Revision 3.

- (8) Will generic guidance still be needed?**

Yes, it will be found in RG 1.160, Revision 3.

- (9) What is the rationale for withdrawing this Regulatory Guide instead of revising it?** (Verify that the methods/techniques presented in the guide no longer provide an acceptable approach or does not otherwise provide useful information.)

RG 1.160, Revision 3, was created in May 2012 and provides methods that are acceptable to the NRC staff for complying with the current provisions of 10 CFR 50.65. RG 1.182 is now superfluous.

- (10) Is the Regulatory Guide referenced in other documents?**

No other documents / ripple effects identified during numerous meetings with external and internal stakeholders.

- (11) Do other agencies rely upon the Regulatory Guide, e.g., the Agreement States, National Aeronautical and Space Administration, Department of Energy?**

None identified during numerous meetings with external and internal stakeholders.