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April 15, 2014

Mr. Lawrence E. Kokajko
Director, Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Draft Guidance for Prioritization and Scheduling Implementation

Project Number: 689

Dear Mr. Kokajko:

Attached for NRC consideration and information is the revised draft industry guidance to support safety focused prioritization and scheduling of plant activities. The guidance incorporates lessons learned from recently completed tabletop exercises performed at three plant sites, including NRC comments, and will be utilized during the planned pilot exercise of the process. We request that NRC undertake a general review of this guidance. This review, along with NRC's planned involvement in the piloting demonstration project, is necessary to fully exercise the prioritization and scheduling process and achieve the final form of the guidance.

The tabletop exercises have demonstrated the prioritization process to be a robust and predictable process that avoids excessive reliance on subjective decision-making attributes for plant-specific prioritization purposes. We believe the process, outlined in the guidance, provides an important opportunity for plants to focus work activities consistent with the plant-specific risk profile and to achieve faster improvements in safety in the complex post-Fukushima regulatory environment. This process is intended to be responsive to COMGEA-12-0001/COMWDM-12-0002, "Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency," and can provide better plant-specific risk understanding and tangible benefits that could lead to the development of broader scope PRA models in the long term.

During a public meeting with NRC staff, scheduled for April 24, we will discuss results from the tabletop exercises, revisions to the guidance document and plans for the pilot activities. The pilot demonstration projects will begin following this meeting.


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The industry appreciates the opportunity to work cooperatively with NRC in developing improvements for managing cumulative impact. The efforts to address plant-specific prioritization and scheduling will enhance the focus on work activities and lead to improvements in safety. If you or your staff have questions in regard to the draft guidance or the pilot activities, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John C. Butler

Attachment

c: Mr. Joseph G. Giitter, NRR/DRA, NRC
Dr. Sunil D. Weerakkody, NRR/DRA/APHB, NRC
Ms. Tara Inverso, NRR/DPR/PRB, NRC
Dr. Fernando J. Ferrante, NRR/DRA/APHB, NRC
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