

February 26, 2015

Technical Specifications Task Force (TSTF)
11921 Rockville Pike, Suite 100
Rockville, MD 20852

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO THE TSTF
LETTER REGARDING REFERENCES TO REGULATORY GUIDE 1.182 IN
APPROVED TRAVELERS

Dear Members of the TSTF:

The NRC published a *Federal Register* Notice (FRN) on November 27, 2012 (77 FR 70846), stating that Regulatory Guide (RG) 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants," has been withdrawn. RG 1.182 is no longer needed, as the guidance in it is now contained in RG 1.160, Revision 3, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The NRC issued RG 1.182 to identify methods that are acceptable to the NRC staff for implementing the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.65(a)(4) associated with managing and assessing the risk of maintenance activities. The NRC has since revised RG 1.160 (Revision 3), to include the guidance in RG 1.182 on acceptable methods to meet those provisions of 10 CFR 50.65(a)(4).

At the July 10, 2014, TSTF/NRC meeting, the NRC requested that in the future license amendment requests to adopt Travelers that reference RG 1.182, should instead reference RG 1.160. By letter dated September 16, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14259A575), the TSTF provided the following information: (a) a listing of specific travelers effected by the withdrawal of the RG 1.182, and (b) a description of proposed actions to be taken by licensees and the NRC for future license amendment requests based on these Travelers. An enclosure to the TSTF letter contains specific Travelers by number which include references to RG 1.182 or a previous version of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," and proposes certain changes which should be made by licensees adopting these Travelers. The letter requested the NRC staff for a review of the specific Travelers as well as the proposed actions as outlined in the enclosure to the TSTF letter.

The NRC staff has reviewed the TSTF letter and understands that some risk-informed Travelers include Bases statements or commitments to 10 CFR 50.65(a)(4) risk assessments using the guidance in RG 1.182.

Per the letter, a typical Bases language states:

The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

RG 1.182 references the February 11, 2000, version of NUMARC 93-01. RG 1.160 endorses NUMARC 93-01, Revision 4A, dated April 2011. Section 11 of Revision 4A of NUMARC 93-01 continues to discuss assessment of risk resulting from performance of maintenance activities.

The NRC staff finds that the TSTF's proposed revisions to risk-informed Travelers is consistent with the November 27, 2012, FRN. The FRN states, in part:

The withdrawal of RG 1.182 does not alter any prior or existing licensing commitments based on its use... Although [RG 1.182] is withdrawn, current licensees may continue to use it, and withdrawal does not affect any existing licenses or agreements. Withdrawal of [RG 1.182] means that the guide should not be used for future NRC licensing activities. [W]ithdrawal of RG 1.182 does not alter the acceptability of the guidance contained in that RG on compliance with 10 CFR 50.65(a)(4), inasmuch as that guidance is now contained in RG 1.160, Revision 3. There is no change in NRC [staff's] position on the acceptability of the guidance formerly included in RG 1.182, which is now included in RG 1.160, [Revision] 3.

Based on the above, the NRC staff concludes that affected Travelers (not limited to those identified since additional Travelers may also currently reference RG 1.182) and specific proposed actions as discussed in the enclosure to the TSTF's letter are adequate measures in resolution of the subject issue. The TSTF's approach in the handling of future license amendment requests is acceptable to the NRC staff.

If you have any questions, please contact Michelle Honcharik at 301-415-1774 or via e-mail at Michelle.Honcharik@nrc.gov.

Sincerely,

/RA/

Anthony J. Mendiola, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 753

cc: See next page

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If you have any questions, please contact Michelle Honcharik at 301-415-1774 or via e-mail at Michelle.Honcharik@nrc.gov.

Sincerely,

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Anthony J. Mendiola, Chief
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