

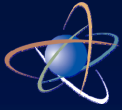
**U.S. NRC**

UNITED STATES NUCLEAR REGULATORY COMMISSION

*Protecting People and the Environment*

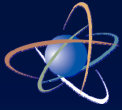
# Considerations for NEI Request to Revise NUMARC 93-01

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission



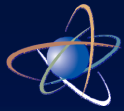
## Meeting Purpose

- On January 20, 2015, the Nuclear Energy Institute (NEI) submitted a request to the Nuclear Regulatory Commission (NRC) to endorse a revision to NUMARC 93-01, Revision 4A via Interim Staff Guidance (ADAMS #ML15022A106).
- The purpose of today's meeting is to discuss considerations associated with an NRC review.



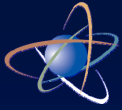
## Brief History

- **10 CFR 50.65 Regulatory Requirements (56 FR 31306, 31308, 31310)**
- **NUMARC 93-01, Revision 4A (Sections 8.2.1.2 and 8.2.1.3)  
(ML11116A198)**
- **Impact of Fukushima Dai-Ichi Accident on Emergency Operating Procedures (EOPs) (ML11186A950)**



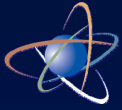
## Concerns with Proposed NUMARC 93-01 Revision

- Proposal may not sufficiently address 10 CFR 50.65(b)(2)(i) scoping issue with regards to FLEX equipment.
  - Issues associated with Section 8.2.1.2 of NUMARC 93-01 not addressed (ML13280A250).
  - Current discussion in Section 8.2.1.3 on “When the EOPs direct the user to another procedure...” may still cause confusion.
- Proposal can also potentially result in scoping issues associated with non-FLEX, non-safety related equipment in EOPs.
  - NEI proposal uses the term “beyond-design-basis events,” while the term found in Section 11.4 of NEI 12-06 (ML12242A378) is “beyond-design-basis external events.”



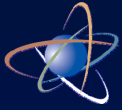
## Potential Revisions to NUMARC 93-01 to Address Concerns

- Consider deleting Section 8.2.1.2 and revise Section 8.2.1.3 to “Non-safety related SSCs that Mitigate Accidents or Transients or that are used in Emergency Operating Procedures.” Section 8.2.1.3 discussions on “implied use” may be sufficient in determining if equipment is relied upon to mitigate an accident or transient.
- Consider revising first bullet in Section 8.2.1.3 to “Nonsafety-related SSCs that are necessary to be in the Maintenance Rule scope by this paragraph are those explicitly used in the EOPs that provide a mitigating function. SSCs used in plant EOPs are required for mitigation of the event/symptom that necessitated entry into the EOP.”
- Consider a stand-alone bullet in Section 8.2.1.3 that indicates “Only those SSCs under licensee control need be included in the Maintenance Rule scope.”



## Potential Revisions to NUMARC 93-01 to Address Concerns (cont.)

- Consider a Section 8.2.1.3 header note that addresses Severe Accident Management Guidelines (SAMGs), 10 CFR 50.54(hh)(2) (Loss of Large Areas), and FLEX.
  - Existing SAMG discussion appears sufficient. Consider revising 50.54(hh)(2) discussion to “Equipment used only in support ...”
  - With regards to FLEX, consider the following: “FLEX equipment, used solely in response to beyond-design-basis external events, and in accordance with Section 11.4 of NEI 12-06, Revision 0, ‘Diverse and Flexible Coping Strategies (FLEX) Implementation Guidance,’ would not be in scope of the Maintenance Rule unless otherwise required by paragraph 50.65(b).”



## **Other Considerations Regarding NRC Endorsement of Revision to NUMARC 93-01**

- **Endorsement would be via Regulatory Guide (RG).**
  - **Requires complete NUMARC document be submitted. NRC review will focus on requested changes.**
  - **Fees would be charged absent an exemption granted per 10 CFR 170.11.**
  - **NRC schedule/resource estimate for RG endorsement ranges from 1 year / 280 hours to 3 years / 840 hours. Based on initial interactions, lower range is more likely.**
- **NUMARC 93-01 revision, even if approved, has potential to be superseded by on-going rulemaking efforts associated with Fukushima Dai-Ichi event.**



# Path Forward

- **NRC requests feedback on identified concerns and considerations prior to determining next course of action associated with NEI January 20, 2015 request.**



**Questions?**