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June 24, 2015

Mr. Scott A. Morris
Director, Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NUMARC 93-01, Revision 4B, for NRC Endorsement

Project Number: 689

Dear Mr. Morris:

The purpose of this letter is to submit revision 4B of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for final NRC endorsement. NUMARC 93-01 was developed to establish an acceptable approach for licensees to meet 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," also known as the Maintenance Rule. The industry and the NRC have had a number of discussions regarding the applicability of the Maintenance Rule to the licensee's Diverse and Flexible Coping Strategies (FLEX) equipment. The general conclusion of these discussions was that FLEX equipment, used solely in response to beyond-design-basis external events, is not intended to be in the scope of the Maintenance Rule. The attached version reflects the results of those discussions and incorporates new language in Section 8.2.1.3 of NUMARC 93-01. NEI understands that the NRC plans to endorse this document with a revision to Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

We request that the NRC review of this document be granted a fee waiver pursuant to the provisions of 10 CFR 170.11, specifically, the request is to support NRC generic regulatory improvements in accordance with 10 CFR 170.11(a)(1)(iii).

NEI appreciates the industry and the NRC effort that has gone into the preparation of this document. If there are any questions on this matter, please contact me at (202) 739-8058; txz@nei.org.

Mr. Scott A. Morris

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References:

1. Meeting Summary from July 20, 2015 NRC Public Meeting to discuss the proposed revision to NUMARC 93-01 (ML15097A034)
2. NEI Letter dated July 20, 2015 from V. Anderson to S. Morris, "Revision to Page 9 of NUMARC 93-01, 'Industry Guideline for Monitoring the Effectiveness of Maintenance At Nuclear Power Plants' to Reflect Position on FLEX Equipment"

Sincerely,

A handwritten signature in cursive script that reads "Thomas Zachariah".

Thomas Zachariah

Attachment

c: Ms. Ami J. Patel, NRR/DIRS/IRIB, NRC
NRC Document Control Desk