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December 14, 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

Subject: Submittal of NUMARC 93-01, Rev 4C, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" for NRC Endorsement

Project Number: 689

Dear Mr. Morris:

Attached for NRC consideration and endorsement is revision 4c of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." 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 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. NEI had previously submitted revision 4b of NUMARC 93-01 for NRC endorsement (Reference 2). Issues were identified with the proposed language and its consistency with how FLEX strategies are currently being integrated into plant Emergency Operating Procedures (EOPs) which led to the need to revisit the document. NEI requests that the NRC review revision 4C of NUMARC 93-01 for their endorsement in lieu of revision 4B.

The attached version incorporates new language in Section 8.2.1.3 of NUMARC 93-01 that addresses the treatment of SSCs only described in FLEX Support Guidelines (FSGs), Severe Accident Management Guidelines (SAMGs), and Extensive Damage Management Guidelines (EDMGs). Consistent with the discussion from the April 20, 2015 public meeting on FSGs, the general conclusion is that these guidelines are not required for the performance of an EOP mitigating function since they do not redefine EOP contents in a manner that deviates from historic EOP development (Reference 1). More specifically, these guidelines were developed to provide an extra level of defense-in-depth in addition to the EOP mitigating function and do not change the existing requirements of that function. Therefore, SSCs only described in these guidelines do not meet the criteria of Paragraph (b) of 10 CFR 50.65 and should not be required in the scope of

Mr. Scott A. Morris
December 14, 2015
Page 2

Paragraph (a)(1) and (a)(2).

Additionally, minor changes in wording for Section 9.4.2 of NUMARC 93-01 were included as a part of this revision. The changes are associated with the statement regarding components credited in plant specific analyses such as a Probabilistic Risk Assessment (PRA). The proposed wording reiterates that the section and statement only applies to components that have been identified to meet the scoping criteria of Paragraph (b) of 10 CFR 50.65 as clarified by Section 8 of NUMARC 93-01. Though an explanation of this intent is provided in the existing language of Section 9.2, the industry feels that that these proposed changes will improve consistency and clarity of the statement.

NEI understands that the NRC endorsement of the revision to NUMARC 93-01 would be through an issuance of interim staff guidance (ISG) and subsequently incorporated into a revision to Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

NEI requests that NRC reviews 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). The details and basis of this request will be documented in a separate letter to the NRC.

NEI appreciates the industry and 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 or txz@nei.org.

References:

1. Meeting Summary from April 20, 2015 NRC Public Meeting to discuss the proposed revision to NUMARC 93-01 (ML15121A657)
2. NEI Letter dated June 24, 2015 from T. Zachariah to S. Morris, "Submittal of NUMARC 93-01, Revision 4B, for NRC Endorsement"

Sincerely,



Thomas Zachariah

Attachment

c: Ms. Ami Patel, NRR/DIRS, NRC
Mr. Jack Davis, JLD, NRC
Mr. Jeremy Bowen, JLD, NRC
Ms. Mandy Halter, JLD, NRC