

THOMAS ZACHARIAH
Project Manager

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8058
txz@nei.org
nei.org



August 18, 2016

Ms. Maureen Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Fee Exemption Request for Revision 4D of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"

Project Number: 689

Dear Ms. Wylie:

On December 14, 2015, NEI submitted revision 4d of guidance document NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for NRC review and endorsement. NUMARC 93-01 is the existing guidance that established 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.

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

NEI requests that the NRC's review of NUMARC 93-01, Revision 4d, and any future submissions of the guidance document be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. The report meets the exemption requirement in 10 CFR 170.11(a)(1)(iii) in that it is "a means of exchanging information between industry organizations and the NRC...for the specific purpose of supporting ongoing NRC generic regulatory improvements or efforts." In this case, the revision of this guidance supports increased regulatory efficiency of agency efforts as it provides a consistent industry approach for the treatment of SSCs described only in Severe Accident Management Guidelines (SAMGs), Extensive Damage Management Guidelines (EDMGs), and FLEX Support Guidelines (FSGs) in meeting the requirements of the Maintenance Rule. The NRC is the primary beneficiary of this guidance as the NRC has and will continue to use this document to support the inspection efforts associated with 10 CFR 50.65.

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Please contact me should you have any questions at 202-739-8058 or txz@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Zachariah". The signature is written in a cursive style with a large initial "T".

Thomas Zachariah

c: Mr. Jeremy Bowen, EDO/AO, NRC
Mr. Jack Davis, NRR/JLD, NRC
Ms. Mandy Halter, NRR/JLD/PPSD/JOMB, NRC
Mr. Scott A. Morris, Director, NRR/DIRS, NRC
Ms. Ami Patel, NRR/DIRS/IRIB, NRC