



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 31, 2016

MEMORANDUM TO: Christopher Regan, Chief
Reactor Inspection Branch
Division of Inspection & Regional Support
Office of Nuclear Reactor Regulation

FROM: Ami Patel, Reactor Operations Engineer */RA/*
Reactor Inspection Branch
Division of Inspection & Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF THE AUGUST 23, 2016, PUBLIC MEETING
BETWEEN U.S. NUCLEAR REGULATORY COMMISSION
STAFF AND INDUSTRY STAKEHOLDERS TO DISCUSS
CHANGES TO NUMARC 93-01, REVISION 4D, INDUSTRY
GUIDELINE FOR MONITORING EFFECTIVENESS OF
MAINTENANCE AT NUCLEAR POWER PLANTS

On August 23, 2016, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and industry stakeholders, at Three White Flint North, Room 01C05. Enclosure 1 contains the meeting attendance list; Enclosure 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16244A151) contains NRC opening remarks and presentation; Enclosure 3 (ADAMS Accession No. ML16244A141) contains Nuclear Energy Institute (NEI) presentation; and Enclosure 4 (ADAMS Accession No. ML16244A145) NRC opening remarks presentation discussed during the meeting. The purpose of the meeting was to discuss changes to Nuclear Utility Management and Resources Council (NUMARC) 93-01, revision 4d, Industry Guideline for Monitoring Effectiveness of Maintenance at Nuclear Power Plants.

The NRC staff emphasized that individual staff views expressed at the meeting do not constitute formal NRC positions or comments and that no decisions would be made at the meeting.

The NRC began the public meeting with opening remarks from the Director of Division of Inspection and Regional Support from the Office of Nuclear Reactor Regulation (NRR), who provided an overview of the topics that would be discussed. The emphasis of the meeting was to discuss the language proposed in NUMARC 93-01 section 8.2.1.3, specifically if the diverse and flexible coping strategies (FLEX) and FLEX support guidelines (FSGs) should be excluded from the scoping requirement of 10CFR 50.65 paragraph (b) if directed by emergency operating procedure. Additionally, the discussion also included use of FLEX equipment as defense-in-depth under 10CFR50.65 (a)(4) assess and manage increase in risk if used during normal or shutdown operations.

The NRC followed the opening remarks with a presentation on NRC staff's perspective on the current proposed revision 4d of NUMARC 93-01 by NEI. During the presentation the NRC staff stressed that staff has concerns regarding the use of FSGs in other emergency operating procedure (EOP) functions besides extended loss of all AC (ELAP) which is outside the scope of the order EA-12-049 (ML12054A736, ORDER TO MODIFY LICENSES WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS). NRC provided number of examples where FLEX equipment and FSGs are being used for purpose other than beyond design basis external event where scoping criteria of 10CFR50.65 paragraph (b) would apply. NRC staff stated that revised language should be tied back to the order EA-12-049 (or 10CFR50.155 when the proposed rule is effective) to clarify what is considered used in the EOPs with regards to FSGs. Also, NRC staff stated that if the FLEX and FSGs are being used for purpose other than EA-12-049 then licensee should evaluate the scoping criteria of paragraph (b) of 10CFR50.65.

NEI presentation was followed by NRC presentation focused on justifying the proposed change in NUMARC 93-01 revision 4d. NEI stated that ELAP is symptom based and not event based (i.e. an external event), and shared that utilities are using the Electric Power Research Institute (EPRI) nuclear maintenance applications center preventive maintenance templates for FLEX equipment. NEI provided example where FLEX is being used for defense-in-depth to use FLEX generators to provide redundant means of providing class 4160V AC power during diesel generator outages.

Throughout the meeting, there were discussions between NRC staff and industry stakeholders on the disagreement on the proposed language in NUMARC 93-01 revision 4d. The NRC staff stressed that staff has concerns regarding the use of FSGs in other EOP functions outside the scope of EA-12-049.

A list of meeting attendees is enclosed.

Please direct any inquiries to Ami Patel, Reactor Operations Engineer, at 301-415-8310, or ami.patel@nrc.gov.

Enclosure:
As stated

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ML16244A121 Package.

ML16235A476 Meeting Notice
ML16244A151 NRC opening remarks
ML16244A141 NEI presentation
ML16244A145 NRC presentation

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|---------------|------------|-------------|
| OFFICE | NRR/DIRS | NRR/DIRS |
| NAME | APatel | CRegan |
| DATE | 08/ 30 /16 | 08 / 29 /16 |

OFFICIAL RECORD COPY

ATTENDANCE LIST

**PUBLIC MEETING BETWEEN STAKEHOLDERS AND THE U.S. NUCLEAR REGULATORY
COMMISSION STAFF TO DISCUSS CHANGES TO NUMARC 93-01, REVISION 4D,
INDUSTRY GUIDELINE FOR MONITORING EFFECTIVENESS OF MAINTENANCE AT
NUCLEAR POWER PLANTS
(CATEGORY 2)**

August 23, 2016

10:00 a.m. - 1:00 p.m.

THREE WHITE FLINT NORTH, ROOM 01C05

| NAME | ORGANIZATION |
|---------------------|---------------------|
| Ami Patel | NRC/NRR/DIRS |
| Christopher Regan | NRC/NRR/DIRS |
| Chris Miller | NRC/NRR/DIRS |
| Matthew Humberstone | NRC/NRR/DRA |
| Sunil Weerakkody | NRC/NRR/DRA |
| Jeff Mitman | NRC/NRR/DRA |
| Michael Montecalvo | NRC/NRR/DRA |
| Larry Wheeler | NRC/NRR |
| Michael Tschiltz | NEI |
| Thomas Zachariah | NEI |
| Larry Parker | STARS Alliance |
| Jana Bergman | Curtiss Wright |
| Scott Bauer | |
| Mike Powell | Arizona Energy |
| Philip Tarpinian | Exelon |
| Ken Heffner | Certrec Corporation |
| Tony Brown | NRC/NRR/JLD |