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January 30, 2017

Mr. Christopher Miller
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 4e, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" for NRC Endorsement

Project Number: 689

Dear Mr. Miller:

Attached for NRC consideration and endorsement is revision 4e 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 4d of NUMARC 93-01 for NRC endorsement (Reference 1). The NRC responded to this revision with their proposed language. NEI has taken the NRC proposed language into consideration and has implemented it with changes in the attached revision. NEI requests that the NRC review revision 4e of NUMARC 93-01 for their endorsement.

The attached version incorporates new language in Section 8.2.1.3 of NUMARC 93-01 that addresses the treatment of non-safety related SSCs where their use is directed by an Emergency Operating Procedure (EOP) only to implement functions in FLEX Support Guidelines (FSGs). 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 that are relied upon solely to support these guidelines do not meet the EOP scoping criteria in Paragraph (b)(2)(i) of 10 CFR 50.65.

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

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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 a revision to Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Given the time required to issue this revision, NEI requests that the NRC staff communicate their acceptance of this language and allow the interim use of the revised guidance. This option will allow licensees to make important decisions and prevent the need to implement unnecessary costly changes to their Maintenance Rule program prior to the endorsement of the guidance.

NEI appreciates NRC's 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. NEI Letter dated June 7, 2016 from T. Zachariah to S. Morris, "Submittal of NUMARC 93-01, Revision 4d, for NRC Endorsement"

Sincerely,



Thomas Zachariah

Attachment

c: Mr. Michael King, NRC
Ms. Ami Patel, NRC
Mr. Michael Franovich, NRC
Mr. Mohamed Shams, NRC