

**THOMAS ZACHARIAH**  
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March 22, 2017

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

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

**Project Number: 689**

Dear Ms. Wylie:

On January 30, 2017, NEI submitted revision 4e 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 4e, 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 when EOPs direct to functions in 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.

Ms. Maureen Wylie

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Please contact me should you have any questions at 202-739-8058 or [txz@nei.org](mailto: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. Christopher Miller, Director, NRR/DIRS, NRC  
Ms. Ami Patel, NRR/DIRS, NRC  
Ms. Jane Marshall, JLD, NRC  
Mr. Mohamed Shams, JLD, NRC  
Mr. Michael King, NRR/DIRS, NRC