



Update of NEI 12-04, “Guidelines for 10 CFR 72.48 Implementation”

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NEI 12-04, Revision 0

- Guidance text similar to NEI 96-07, Appendix B, with several clarifications and additions
- NEI 12-04, Revision 0, Appendix A (provides examples for guidance on specific aspects to specific situations)
- NEI 12-04, Revision 0, Appendix B (provides realistic examples of 72.48 activities)
- NEI requests NRC endorse the guidance through the regulatory guide process



STAFF REVIEW

- 1st Interim Letter – September 28, 2013
- 2nd Interim Letter, with MOE staff position – December 11, 2014
- Final Response - April 24, 2015
- NRC/NEI public meeting (NEI key and fundamental issues) - March 3, 2016



STAFF REVIEW (con't)

- NEI Industry Summary reply - August 8, 2016
- NRC Response to NEI Industry Summary - March 3, 2017 (aligned on 10 of the 11 issues)
- NRC/NEI public meeting - May 11, 2017
- NRC/NEI public meeting on MOEs - July 11, 2017
- NEI submittal of NEI 12-04, Revision 1, Draft A – September 5, 2017



OUTSTANDING ISSUE

- Method of evaluation (MOE) language in NEI 12-04
 - NRC and industry are aligned in principle
 - Ensuring current practices are consistent with the intent of the principle
 - Staff is developing the technical basis for this change in practice
 - Identifying if additional communications are needed



NEI 12-04 PATH FORWARD

- NRC review and comment on NEI 12-04, Revision 1, Draft A
- NRC/NEI public meeting to discuss NRC comments
- NEI submittal of NEI 12-04, Revision 1
- NRC review of NEI 12-04, Revision 1
- Draft Regulatory Guide in concurrence



REFERENCES

- NEI 12-04, Revision 0, “Guidelines for 10 CFR 72.48 Implementation” – ML12258A356
- Interim Response to NEI 12-04 – ML13260A030
- 2nd Interim Response to NEI 12-04 – ML14349A318
- Final Response to NEI 12-04 – ML15110A174
- NEI Industry Summary Meeting – ML16251A024
- NRC Response to NEI Industry Summary Meeting – ML17065A180
- NEI submittal of NEI 12-04, Revision 1, Draft 1 – ML17249A095

