

REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE DG-1336 MONITORING THE EFFECTIVENESS OF MAINTENANCE AT NUCLEAR POWER PLANTS

(Proposed Revision 4 of Regulatory Guide 1.160, dated May, 2012)

1. Statement of the Problem

The U.S. Nuclear Regulatory Commission (NRC) is considering revising Regulatory Guide (RG) 1.160 to endorse the latest revision, Revision 4F, of Nuclear Management and Resources Council (NUMARC) 93 01 "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

The current version of RG 1.160 (Revision 3) was issued in May 2012, to endorse Revision 4A to NUMARC 93-01 issued April 2011. In April 2018, Revision 4F to NUMARC 93-01 was issued. The issuance of Revision 4F has resulted in misalignment between the endorsed and the most current standard available to stakeholders. In addition, Revision 4F to NUMARC 93-01 introduces new guidance that addresses the application of the Maintenance Rule (10 CFR 50.65) to the use of diverse and flexible coping strategies (FLEX) support guidelines in plant emergency operating procedures. Without endorsed guidance for the use of FLEX, the staff's perspectives and guidance on acceptable solutions to meet the requirements of the maintenance rule with respect to FLEX would remain unclear and could lead to future elements require staff intervention or review (e.g., inspection findings, amendment requests, or staff requests for information).

2. Objective

The objective of this regulatory action is to issue a revised RG endorsing the latest revision of NUMARC 93-01.

Revising this RG to endorse portions of a consensus standard is consistent with the NRC policy of evaluating the latest versions of national consensus standards to determine their suitability for endorsement by RGs. The NRC's use of consensus standards is consistent with the requirements of Public Law 104-113, the National Technology Transfer and Advancement Act of 1995 and Management Directive 6.5, "NRC participation in the Development and Use of Consensus Standards."

3. Alternative Approaches

The NRC staff considered the following alternative approaches:

1. Do not revise Regulatory Guide 1.160.
2. Revise Regulatory Guide 1.160 to address current revision to NUMARC 93-01.

Alternative 1: Do Not Revise Regulatory Guide 1.160

Under this alternative, the NRC would not revise RG 1.160 to endorse Revision 4F of NUMARC 93-01, and the current guidance would be retained. If NRC does not take action, there would not be any changes in costs or benefit to the public, licensees or NRC. This alternative is considered the baseline or “no action” alternative condition from which any other alternatives will be assessed. However, the “no-action” alternative would not address identified concerns with the current version of the RG. The impact of this alternative is that applicants will lose the benefit of the staff’s perspectives and guidance on acceptable solutions to meet the requirements of the maintenance rule.

Alternative 2: Revise Regulatory Guide 1.160

Under this alternative, the NRC would revise RG 1.160. This revision would incorporate the latest information from Revision 4F of NUMARC 93-01. By doing so, the NRC would ensure that the RG guidance available in this area is current and accurately reflects the staff’s position on issues that were not discussed in Revision 4A to NUMARC 93-01 or the associated Rev. 3 of RG 1.160. The impact to the NRC would be the costs associated with preparing and issuing the RG revision. The impact to the public would be the voluntary costs associated with reviewing and providing comments to NRC during the public comment period. The value to NRC staff, licensees, and applicants would be the benefits associated with enhanced efficiency and effectiveness in using a common guidance document as the technical basis for compliance, license applications, and other interactions between the NRC and its regulated entities.

Conclusion

Based on this regulatory analysis, the NRC staff concludes that revision of RG 1.160 is warranted. The action will reduce unnecessary burden on both the NRC, licensees, and applicants, and will result in an improved and more uniform process for licensees to demonstrate compliance with the requirements of 10 CFR 50.65. Moreover, the staff sees no significant adverse effects associated with revising this RG.