



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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June 14, 2018

MEMORANDUM TO: Brian E. Thomas, Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Michael C. Cheok, Director */RA/*
Division of Risk Analysis
Office of Nuclear Regulatory Research

SUBJECT: RESULTS OF PERIODIC REVIEW OF REGULATORY GUIDES
(RG) 1.175, RG 1.177, AND RG 1.178

This memorandum documents the U.S. Nuclear Regulatory Commission (NRC) periodic review of regulatory guide (RG) 1.175, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing," RG 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.178, "An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping." RG 1.175, published in August 1998, describes an acceptable approach for the development of a risk-informed application in support of a change to an inservice testing program. RG 1.177, published in May, 2011, describes methods acceptable to the NRC staff for assessing the nature and impact of proposed technical specification changes by considering engineering issues and applying risk insights. RG 1.178, published in September 2003, describes guidance on acceptable approaches to meeting the existing Section XI requirements for the scope and frequency of inspection of inservice inspection of piping programs. As discussed in Management Directive 6.6, "Regulatory Guides," the NRC staff reviews RGs approximately every 10 years to ensure that the RGs continue to provide useful guidance. Documentation of the NRC staff review is enclosed.

Based on the results of the periodic review, the staff concludes that revisions to RG 1.175, Revision 0, RG 1.177, Revision 1, and RG 1.178, Revision 1, are warranted. The staff plans to develop draft guides for RG 1.175, RG 1.177, and RG 1.178 to revise the guidance on defense in depth consistent with the recently revised defense-in-depth guidance in RG 1.174, Revision 3; implement the decision on DPO-2016-001 related to adoption of the term PRA acceptability; and update the RGs to conform to the latest acceptable RG program guidance. Additionally, the staff will consider whether revised language is needed in RG 1.177 that a) more specifically differentiates between one-time technical specification changes and permanent technical specification changes; and b) addresses the practice of using guidance in RG 1.177 for self-approval activities by licensees (e.g., Risk Initiatives 4B and 5B) as opposed to an application that is submitted to the NRC. It is currently anticipated that the development of these three draft guides will require a total of approximately 0.5 FTE and will not use resources for contracting. Although many of the changes for these revisions will be the same or very similar across all RG, some changes will be specific to each RG and will require separate effort. As such, this total estimated effort is not equal to the sum of the individual estimates of efforts for each revision. The staff expects to submit draft versions of these RGs to the Office of Nuclear Regulatory Research staff for processing by November 2018 and issue it for public comment by the first quarter of the 2019 calendar year.

Enclosure:
As stated

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