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July 25, 2018

Ms. May Ma
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Comments on Draft Regulatory Guide (DG)-1336, "Proposed Revision 4 to Regulatory Guide 1.160" [Docket ID – NRC-2018-0131]

Project Number: 689

Dear Ms. Ma:

The Nuclear Energy Institute (NEI)¹, on behalf of our members, appreciates the opportunity to provide comments on DG-1336, "Proposed Revision 4 to Regulatory Guide 1.160"². The proposed Revision 4 to RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants" endorses Revision 4f of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," specifically the applicability of the Maintenance Rule (i.e., 10 CFR 50.65) to the use of licensee's diverse and flexible coping strategies (FLEX) support guidelines (FSGs) in plant emergency operating procedures (EOPs).

Overall, the changes reflected in DG-1336 are appropriate and well-articulated. However, NEI did note an unexpected addition in Section 2.1 "Use of Probabilistic Risk Assessments" (page 17 of DG-1336.) The last sentence of Section 2.1 notes that RG 1.200 "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities" is an acceptable approach to develop and maintain Probabilistic Risk Assessment (PRA) acceptability in support of risk-informed decision-making.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

² ML18129A080, Draft Regulatory Guide (DG)-1336, "Proposed Revision 4 to Regulatory Guide 1.160"

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Adding RG 1.200 to the PRA section of RG 1.160 is a new position and should be deleted, as RG 1.200 addresses licensing applications and is not applicable for RG 1.160 activities. NEI recommends maintaining the current language in Revision 3 of RG 1.160 (page 7 under Section entitled "Use of Probabilistic Risk Assessments") that states "When a PRA is used in a licensee's implementation of the maintenance rule, the technical adequacy of the base PRA should be sufficient to provide the needed confidence in the results being used in the decision." If the staff does not agree with removing the reference to RG 1.200 from the proposed Revision 4 to RG 1.160, then NEI requests a public meeting at the staff's earliest convenience to support a technical discussion in resolving the comment.

Please find the full list of comments in the attachment to this letter for consideration as the staff incorporates stakeholder feedback and continues the DG-1336 concurrence process.

If you have any questions or require additional information, please contact me at (202) 739-8163; svj@nei.org.

Sincerely,



Stephen J. Vaughn

Attachment

c: Mr. Michael King, NRR/DIRS, NRC
Mr. Michael Franovich, NRR/DRA, NRC
Mr. Michael Cheek, RES/DRA, NRC
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Mr. Thomas Hipschman, NRR/DIRS/IRIB, NRC
Mr. Stephen Burton, RES/DE/RGGIB
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Page	Comment	Recommendation
9	Editorial. There is a comma after "EA 12-049" and there should be a period.	Remove the comma after "EA 12-049" and replace it with a period.
9	In the sentence "Because the FSG equipment is not essential to the EOPs," the phrase "essential to the EOPs" should be clarified.	Change "essential to the EOPs" to "essential to the successful implementation of the EOP mitigating strategies"
12	In Section 1, the phrase "...subject to the following exceptions and clarifications" is different than Revision 3 to RG 1.160 which states "...subject to the following provisions and clarifications." It isn't clear why the term "exceptions" is being used instead of the previously used term "provisions."	Given that the proposed Revision 4 to RG 1.160 is not taking any specific exceptions to Revision 4F of NUMARC 93-01, the term "provisions" should be maintained or condense the phrase "provisions and clarifications" to just "clarifications."
17	In Section 2.1, the last sentence "RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment results for Risk-Informed Activities," (Ref. 18) describes an approach the NRC staff finds acceptable to develop and maintain PRA acceptability in support of risk-informed decision-making" is a new position compared to Revision 3 (and all previous Revisions) to RG 1.160.	Remove the last sentence in section 2.1 regarding RG 1.200 and maintain the Revision 3 to RG 1.160 language from the section "Use of Probabilistic Risk Assessments" that states "When a PRA is used in a licensee's implementation of the maintenance rule, the technical adequacy of the base PRA should be sufficient to provide the needed confidence in the results being used in the decision."
24	Reference 18 is RG 1.200. As described in the comment on page 17 and the associated recommendation, the addition of RG 1.200 as a PRA reference in RG 1.160 is not warranted.	Remove Reference 18 "NRC, RG 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment results for Risk-Informed Activities," Washington DC." from page 24.