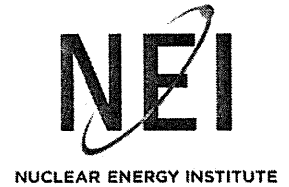


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APC 19-04

February 26, 2019

To: NEI Administrative Points of Contact

Subject: Revision 1 to NEI 07-07, "Industry Groundwater Protection Initiative – Final Guidance Document"

Please forward this letter and its attachment to individuals within your respective organizations involved in groundwater-related areas.

In 2007 the industry developed and implemented NEI 07-07, Industry Groundwater Protection Initiative – Final Guidance Document. Since that time groundwater protection programs have matured and other technical guidance documents have been developed. An industry team, experienced in groundwater protection, recently reviewed and updated the original document.

Following are the key changes incorporated into Revision 1 to NEI 07-07:

- Developed a Decommissioning/Safstor Objective
- Removed the need for performing the 5 year cycle of "Peer Reviews"
- Clarified a few terms/definitions
- Aligned expressions for consistency (e.g., Site Conceptual Model vs. Conceptual Site Model)
- Aligned NEI 07-07 to match NEI 08-08, "Generic FSAR Template Guidance for Life-Cycle Minimization of Contamination"
- Corrected typographical errors

Rationale for Ceasing the 5 Year Peer-Review Cycle

The initial revision of NEI 07-07 required both a self-assessment and a peer assessment performed under the auspices of NEI on a 5 year frequency cycle. Objectives 3.1 and 3.2 also required an independent, knowledgeable individual to perform the initial assessments. The intent of these initial assessments was to aid the industry in the establishment of groundwater protection programs. These programs are now mature and robust and include routine inspections by the NRC.

After multiple NRC inspection cycles since full implementation only a few findings have been identified in the area of groundwater protection and all were "green" (very low safety significance). The second cycle of peer assessments, while identifying some opportunities for program enhancements, determined that all sites are adequately implementing the provisions of NEI 07-07. As such, the groundwater protection program area no

longer warrants the additional peer assessment performed under the auspices of NEI to verify compliance. However, there will continue to be a requirement for a self-assessment.

Site specific self-assessments, along with routine NRC inspections, are adequate to ensure future compliance with the guidelines in this document. The peer assessment objective, 3.2 in the initial revision, has been removed from this document. Objectives 3.1 and 3.2 are consolidated into a single objective

Implementation Date

The revised document has an implementation date of 03.01.19. NEI recommends that members inform their local stakeholders and applicable regulatory agencies on these changes as part of routine meetings/correspondence and evaluate applicable procedures for possible revision.

Please contact me at (202) 739-8043 or exa@nei.org with any program-related questions.

Sincerely,

A handwritten signature in black ink that reads "Ellen P. Anderson". The signature is written in a cursive, flowing style.

Ellen P. Anderson

Attachment