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ADD: Harriet Karagiannis

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Docket: NRC-2012-0110

Issuance and Availability; request for comment (DG-1285, DG-1286, DG-1287, DG-1288)

Comment On: NRC-2012-0110-0018

An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications

Document: NRC-2012-0110-DRAFT-0016

Comment on FR Doc # 2020-03237

Submitter Information

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General Comment

Industry Comments on Draft Regulatory Guide (DG) 1287, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," 85 FRN 9484-9486; Docket ID NRC-2012-0110

Attachments

04-16-20_Industry Comments on DG 1287

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April 16, 2020

Jennifer Borges
Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft Regulatory Guide (DG) 1287, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications," 85 FRN 9484-9486; Docket ID NRC-2012-0110

Project Number: 689

Dear Ms. Jennifer Borges:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, submits the following comments DG-1287, "An Approach for Plant-Specific, Risk-Informed Decision-making: Technical Specifications." We are supportive of the effort to revise this regulatory guide to improve consistency with other regulatory guides, and appreciate the opportunity to comment on the draft revision.

In our review, we noted that the draft revision generally offers improvements in clarity and consistency. Below are some comments to further improve that clarity and consistency:

- The ICCDP/ICLERP limits in Section 2.4 are inconsistent with those given in NEI 06-09, "Risk-Informed Technical Specifications Initiative 4b: Risk-Managed Technical Specifications (RMTS) Guidance." To avoid confusion over which document has precedence for future applications, a footnote should be added to identify this exception for plants that adopt the provisions of NEI 06-09.
- The discussion of Maintenance Rule Performance Criteria in Section 3.2 should be revised to include Performance Monitoring to address plants that have transitioned to Maintenance Rule 2.0, which does not involve the use of Performance Criteria.
- Section 2.2.2, paragraph (a) states that sufficient safety margins are maintained if "Codes and standards (e.g., American Society of Mechanical Engineers, Institute of Electrical and Electronics Engineers) or alternatives approved for use by the NRC are met (e.g., the proposed TS CT or SF change does not conflict with approved codes and standards relevant to the subject system)."

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to 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 and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Ms. Jennifer Borges

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However, licensees may also extend surveillances or outage times if a relief request is granted under a specific code or standard. This paragraph should be clarified to include relief requests, such as those related to diesel generator testing for insurance standard purposes, as well.

We encourage NRC to consider all stakeholder comments prior to finalizing the revision to this regulatory guide. Please contact me at yka@nei.org or (202) 739-8101 with any questions or comments about the content of this letter or the attached comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria K. Anderson".

Victoria K. Anderson

c: Mr. Michael Franovich, NRR
Mr. Robert Pascarelli, NRR
Mr. Gary Wang, RES
Ms. Harriet Karagiannis, RES
NRC Document Control Desk