

MEMORANDUM TO: Stewart L. Magruder, Project Manager
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THRU: Richard P. Correia, Chief
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FROM: Francis X. Talbot, Reactor Operations Engineer
Reliability and Maintenance Section
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SUBJECT: SUMMARY OF JUNE 17, 1999, MEETING BETWEEN THE NUCLEAR
REGULATORY COMMISSION (NRC) AND THE NUCLEAR ENERGY
INSTITUTE (NEI) REGARDING CHANGES TO GUIDANCE
DOCUMENTS USED TO IMPLEMENT 10 CFR 50.65(a)(4)

On June 17, 1999, the NRC staff held a public meeting in One White Flint North with representatives from the Nuclear Energy Institute (NEI) to provide and discuss NRC's feedback on NEI's proposed changes to NUMARC 93-01, Section 11, "Assessment of Risk Resulting from Performance of Maintenance Activities" (attachment 1). NEI proposed changes to their NRC endorsed maintenance rule implementation guidance document, NUMARC 93-01, Revision 2, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants (April, 1996)" would update that document to incorporate implementing guidance for the proposed changes to 10 CFR 50.65 presently before the Commission for final approval. The maintenance rule changes under Commission consideration would add a new paragraph (a)(4) to the rule that would require licensees to assess and manage the increase in risk that may result from proposed maintenance activities. The rule change also proposed to permit licensees to limit the scope of the assessments to SSCs that a risk-informed evaluation process has shown to be significant to public health and safety.¹ All operating plant licensees would be affected by the rule change, and they all follow the NUMARC 93-01 guidance.

The NRC staff provided the audience with copies of its draft Regulatory Guide (RG) DG-1082, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," dated June, 1999, (attachment 2) which is proposed as a companion guide to RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Also provided was NEI's draft revision to NUMARC 93-01. The staff reviewed the Commission directed schedule for

¹The Commission approved these changes to the maintenance rule on June 18, 1999.

submitting their approval to a regulatory guide for the revised 10 CFR 50.65 by November 15, 1999. NEI estimated that they would provide draft Section 11 guidance to the industry and NRC July 9, 1999, with final revisions incorporated into NUMARC 93-01 by August 1999.

During the meeting, the NRC staff focused on three issues that need to be clarified before the staff would pursue endorsement of the revised Section 11 of NUMARC 93-01. The issues are:

- ! the risk-informed scope of structures, systems and components (SSCs) under the pre-maintenance safety assessment program,
- ! numerical threshold levels for managing risk significant configurations due to maintenance, and
- ! adding a subsection to NUMARC 93-01, Section 11.0, on managing increases in risk when performing maintenance activities

The NRC staff provided NEI with their position on the scope of SSCs that should be included in the industry pre-maintenance safety assessment programs as described in DG-1082. DG-1082 recommends that the scope should be based on SSCs modeled in probabilistic risk assessments (PRAs) plus all other SSCs considered to be risk significant (high safety significant (HSS)) by the licensees' maintenance rule expert panels. In addition, utilities should determine if SSCs meet the following conditions for inclusion in pre-maintenance safety assessment programs:

- (1) the SSC is a support system for a HSS SSC,
- (2) the SSC has dependencies with another low safety significant SSC
- (3) the SSC failure could increase any initiating event frequency, or
- (4) the SSC is in a relatively low frequency cutset that becomes a significant contributor to the plant core damage frequency (or large early release frequency) when multiple SSCs are out of service.

The NEI stated that they would consider using the industry peer review group for assessment of PRAs to evaluate the scope of SSCs that should be included in the pre-maintenance safety assessment programs. In addition, the group could be used to evaluate the scope criteria for pre-maintenance safety assessments noted above.

The NEI stated that they were concerned with the use of quantitative risk threshold levels for risk significant configurations and NRC staff interpretation of enforcement issues associated with licensees entering risk significant configurations due to maintenance. The NEI stated that quantitative risk threshold levels would be different for each plant. In addition, NEI and the industry were concerned with the NRC taking enforcement action when licensees entered risk significant configurations based on these threshold levels. The NEI stated that they preferred to not place quantitative risk thresholds in NUMARC 93-01 for these reasons.

The NRC staff stated that risk informed thresholds were provided in DG-1082 and that NEI should provide thresholds in NUMARC 93-01, Section 11.0, similar to threshold levels provided in other industry documents such as the Electrical Power Research Institute (EPRI) Technical Report (TR)-105396(a), Probabilistic Safety Assessment (PSA) Applications Guide. The NRC

staff stated that enforcement action would not be taken for entering risk significant configurations but rather the NRC staff expects threshold levels to be used by the industry as an initiator to take management action when entering risk significant configurations due to maintenance (i.e., plant staff are at a heightened state of risk awareness, contingency actions are in place to return HSS SSCs to service, perform round the clock maintenance, change the maintenance schedule, etc). The NRC staff also stated that a subsection should be added to Section 11.0 of NUMARC 93-01 to address managing increases in risk when performing maintenance.

The NEI stated that they would revise Section 11.0 to address managing increases in risk when performing maintenance. The NEI also stated that they could use some of the guidance provided by the staff in DG-1082 to address this issue.

Additionally, NEI stated that they are going to make a few other changes in NUMARC 93-01 based on lessons learned from the baseline inspections. Principle among these is a change to the definition of availability. NEI did not share their desired specific revision to that definition nor did they detail what their other changes would be. The NEI also raised a question concerning the definition of unavailability in different industry guidance documents. Both the NRC staff and NEI agreed that the definition of unavailability should be consistent for all NRC and industry guidance documents used to track unavailability for different programs (NUMARC 93-01, INPO Equipment Performance and Information Exchange database, NRC Inspection and Oversight Program Performance Indicators, etc).

NEI stated that they would like to meet with the NRC staff again to discuss revisions to NUMARC 93-01 and Regulatory Guide 1.160 sometime in July, 1999. The NRC staff stated that a meeting would be planned to discuss final revisions to RG 1.160 and NUMARC 93-01, Section 11.

The attendance list is included (attachment 3).

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50.65(A)(4)

ORIGINATOR: FXTalbot

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