

MEMORANDUM TO: Peter Wen, Project Manager  
Generic Issues and Environmental Projects Branch  
Division of Reactor Program Management

THRU: Richard P. Correia, Chief  
Reliability and Maintenance Section  
Quality Assurance, Vendor Inspection, Maintenance and Allegations  
Branch  
Division of Inspection Program Management

FROM: Donnie J. Ashley, Operations Specialist  
Reliability and Maintenance Section  
Quality Assurance, Vendor Inspection, Maintenance and Allegations  
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Division of Inspection Program Management

SUBJECT: SUMMARY OF JULY 9, 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 July 9, 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). This was the second meeting held to discuss these issues, the previous meeting was held on June 19, 1999. 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)." These changes would update that document to incorporate implementing guidance for the recently approved changes to 10CFR50.65. The maintenance rule changes added 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 permits 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.<sup>1</sup> All operating plant licensees are affected by the rule change, and they all generally follow the NUMARC 93-01 guidance.

The NRC staff provided the audience with copies of the draft NUMARC document that was reviewed by the staff prior to the meeting. NEI provided the following draft time-line for its publication of the revised Section 11.

- July 14, meet with ACRS for discussions on the NRC Draft Regulatory Guide and Section 11 to 93-01

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

- July 23, send draft to NRC and licensees for review and comment.
- August 23, begin work on resolving comments
- August 31, provide final draft to NRC for endorsement.

NEI also discussed the basic outline of the upcoming 1 ½ day workshop to be held September 13-14, 1999. The following items are planned as part of the discussion:

- Lessons learned on Maintenance Rule Baseline Inspections
- Definition of unavailability
- The new (a)(4) and the new oversight process

NEI representatives agreed to address the NRC staff's comments in the next revision to Section 11.

The remainder of the meeting was spent reviewing the staff's specific comments on the proposed changes to NUMAR93-01 section 11.

The two main issues (discussed at the June 19 meeting) are still yet 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 identifying risk significant configurations due to maintenance, and

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). Both NRC and NEI will have representatives at a meeting at INPO scheduled for the week of July 19, 1999 to discuss these and other related issues.

The NRC staff provided the meeting with a copy of the "USE OF RISK INFORMATION IN NRC AND INDUSTRY PROGRAMS" matrix. This matrix is attached to these meeting minutes as (attachment 1) The attendance list is included (attachment 2).

Attachments: As stated

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**ORIGINATOR:** DJAshley

**SECRETARY:** CTobe

**DATE:** April 26, 2002

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2.	<u>RPCorreia</u>	_____
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