

August 23, 2007

Mr. Adrian P. Heymer, Senior Director
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Nuclear Generation Division
Nuclear Energy Institute
1776 I Street, NW, Suite 400
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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TOPICAL
REPORT NEI 07-02, "GENERIC FSAR TEMPLATE GUIDANCE FOR
MAINTENANCE RULE PROGRAM DESCRIPTION FOR PLANTS LICENSED
UNDER 10 CFR PART 52," REVISION 1

Dear Mr. Heymer:

By letter dated February 2, 2007 the Nuclear Energy Institute (NEI) submitted for U.S. Nuclear Regulatory Commission (NRC) staff review, its proposed "Generic FSAR Template Guidance for Maintenance Rule Program Description," Revision 0 (ADAMS Accession Number ML070610363). In response to issuance of Regulatory Guide 1.206, Revision 0 of this Technical Report was withdrawn, and by letter dated July 2, 2007, the Nuclear Energy Institute (NEI) submitted the revised "Generic FSAR Template Guidance for Maintenance Rule Program Description," Revision 1 (ADAMS Accession Number ML072140499).

The NRC staff performed an acceptance review of NEI 07-02, Revision 1, and found the material presented sufficient to begin our comprehensive review. The staff has also determined that additional information is necessary to complete this review.

On August 2, 2007, an electronic draft copy of the enclosed request for additional information (RAI) was transmitted to NEI's staff and discussed via telephone call. The NRC staff expects to issue its safety evaluation report by October 19, 2007, based on a 30 day response time for NEI on these questions. The staff estimates that this review will require approximately 160 staff hours including project management time. These review schedule milestones and estimated costs were discussed in a telephone call with NEI's staff on July 20, 2007, wherein, it was agreed that NEI would respond to the staff's RAIs in less than 30 days, barring complications.

If you have any questions or comments regarding this matter, I may be reached at (301) 415-0737, or by e-mail, mac6@nrc.gov.

Sincerely,

/RA/

Michael A. Canova, Project Manager
EPR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Project No. 689
Enclosure: RAI Questions

cc w/encl: See Next page

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**REQUEST FOR ADDITIONAL INFORMATION REGARDING
NEI 07-02, "GENERIC FSAR TEMPLATE GUIDANCE FOR MAINTENANCE RULE
PROGRAM DESCRIPTION FOR PLANTS LICENSED UNDER 10 CFR PART 52,"
REVISION 1 (PROJECT NO. 689)**

1. A significant time gap exists from the point of time when this document may be used with a Combined Operating License (COL) until the time that an expert panel is formed. During this period, the program will identify additional System, Structure or Component (SSC) functions that may be added or removed from the Maintenance Rule scope prior to the fuel load. One such example of SSCs that will need to be added are SSCs associated with the facility Emergency Operating Procedures (EOPs). Therefore, there should be a statement that ensures that late-identified SSCs will be addressed (as described in Section 17.X.1, "Maintenance Rule Program Description.")
2. Section 17.X.1.3 "Preventive maintenance per 10 CFR 50.65(a)(2)," describes how to determine which of the SSCs within the scope of the rule will be tracked in accordance with 50.65(a)(2). However, it does not cover the process for SSCs which are categorized in a Run-to-Failure status. Please explain your reasoning as to why Run to Failure considerations do not require treatment in this Topical Report.
3. In Section 17.X.1.4, "Periodic evaluation of monitoring and preventive maintenance per 10 CFR 50.65(a)(3)," the bulleted section contents appear to be taken out of NUREG 0800, the Standard Review Plan (SRP) 17.6 Maintenance Rule, with the exception of "Review of 50.65(a)(1) goals and 50.65(a)(2) performance criteria, condition monitoring criteria, SSC performance and condition history and effectiveness of corrective action." Without additional information, the staff believes this should be included in this section.
4. The first paragraph sentence of Section 17.X.3, "Maintenance Rule Program Relationship With Reliability Assurance Activities," fails to include corrective maintenance as a related Maintenance Rule-related program. Either corrective maintenance should be included in the list of programs identified in this section or the broader category of simply "maintenance programs" should be used. Please explain your intentions if the corrective maintenance program was omitted on purpose.

Enclosure