

REGULATORY ANALYSIS

DRAFT REGULATORY GUIDE DG-1278

MONITORING THE EFFECTIVENESS OF MAINTENANCE AT NUCLEAR POWER PLANTS

(Proposed Revision 3 of Regulatory Guide 1.160, dated March 1997)

Statement of the Problem

DG 1278 is the proposed revision 3 of Regulatory Guide 1.160, originally published in March 1997. In April, 2011, Nuclear Management and Resources Council (NUMARC) issued Revision 4A to 93-01, “Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants.”

Revision of Regulatory Guide 1.160 is necessary for the NRC to endorse the use of the latest revision of NUMARC 93-01 as a technical standard to ensure compliance with the maintenance rule as provided in 10 CFR 50.65.

Objective

The objective of this regulatory action is to issue a revised regulatory guide endorsing the latest revision of NUMARC 93-01.

Alternative Approaches

The Nuclear Regulatory Commission (NRC) staff considered the following alternative approaches:

Do not issue a revised regulatory guide.

Issue a revised regulatory guide (based upon draft regulatory guide (DG) - 1278).

Alternative 1: Do Not Issue a New Regulatory Guide

Under this alternative, the NRC would not issue a new regulatory guide to endorse Revision 4A of NUMARC 93-01. If the NRC does not take action, there will be no changes in the cost or benefit to the public, applicants, or the NRC. This alternative is considered the baseline or “no action” alternative. The impact of this alternative is that applicants will lose the benefit of the staff’s perspectives and guidance on acceptable solutions to meet the requirements of the maintenance rule. If the new regulatory guide is not issued, licensees will continue to use existing guidance to meet the maintenance rule.

Alternative 2: Issue a New Regulatory Guide (based upon DG-1278)

Under this alternative, the NRC will issue a new regulatory guide (based upon DG-1278) to provide licensees with guidance that the staff considers acceptable for use in implementing the maintenance rule. The impact to NRC will be the costs associated with preparing and issuing the new guide. The impact to the public will be the voluntary costs associated with reviewing and providing comments to NRC during the public comment period.

Conclusion

Based on this regulatory analysis, the staff recommends revision of Regulatory Guide 1.160. The staff concludes that the proposed action will reduce unnecessary burden on both the NRC and its licensees and will result in an improved and more uniform process for licensees to demonstrate compliance with the requirements of 10 CFR 50.65. Moreover, the staff sees no significant adverse effects associated with issuing this regulatory guide.