

September 16, 2014

TSTF-14-10
PROJ0753

Attn: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Revision of References to Regulatory Guide 1.182 in Approved Travelers

Dear Sir or Madam:

At the July 10, 2014 TSTF/NRC meeting, the NRC requested that license amendment requests to adopt Travelers that reference Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," should instead reference RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." On November 27, 2012, the NRC published a Federal Register Notice stating that RG 1.182 has been withdrawn and the subject matter has been incorporated into RG 1.160. RG 1.182 references the February 11, 2000 version of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." RG 1.160 endorses Revision 4A of NUMARC 93-01, dated April 2011.

The withdrawal of RG 1.182 affects the following approved Travelers:

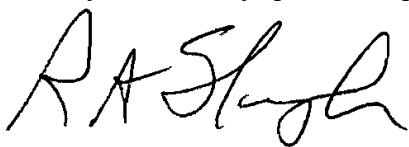
- TSTF-358-A, Rev. 6, "Missed Surveillance Requirements"
- TSTF-359-A, Rev. 9, "Increase Flexibility in Mode Restraints"
- TSTF-372-A, Rev. 4, "Addition of LCO 3.0.8, Inoperability of Snubbers"
- TSTF-422-A, Rev. 2, "Change in Technical Specifications End States, CE NPSD-1186"
- TSTF-423-A, Rev. 1, "Technical Specifications End States, NEDC-32988-A"
- TSTF-427-A, Rev. 2, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability"
- TSTF-431-A, Rev. 3, "Change in Technical Specifications End States, BAW-2441"
- TSTF-432-A, Rev. 0, "Change in Technical Specifications End States, WCAP-16294"

- TSTF-439-A ,Rev. 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO"
- TSTF-454, Rev. 2, "Extend PCIV Completion Times, NEDC-33046"

The enclosure describes the effect of withdrawal of RG 1.182 on each of these changes and proposed actions to be taken by licensees and the NRC for future license amendment requests based on these Travelers.

If this approach is acceptable, please notify us and we will notify licensees to follow this guidance. Otherwise, please contact us so that we may determine an appropriate approach.

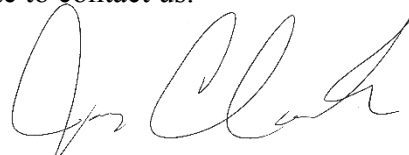
Should you have any questions, please do not hesitate to contact us.



Robert A. Slough (PWROG/W)



Otto W. Gustafson (PWROG/CE)



Joseph A. Clark (BWROG)



Henry L. Hegrat (PWROG/B&W)

Enclosure

cc: Michelle Honcharik, Licensing Processes Branch, NRC
Robert Elliott, Technical Specifications Branch, NRC

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Some risk informed Travelers include Bases statements or commitments to perform 10 CFR 50.65(a)(4) risk assessments using the guidance in Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Typical Bases language states:

The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

RG 1.182 references the February 11, 2000 version of NUMARC 93-01.

On November 27, 2012, the NRC published a Federal Register Notice stating that RG 1.182 has been withdrawn and the subject matter has been incorporated into RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." RG 1.160 endorses NUMARC 93-01, Revision 4A, dated April 2011. Section 11 of Revision 4A of NUMARC 93-01 continues to discuss assessment of risk resulting from performance of maintenance activities.

At the July 10, 2014 TSTF/NRC meeting, the NRC requested that licensees submitting license amendment requests to adopt Travelers that reference RG 1.182 instead reference RG 1.160. As stated in the November 27, 2012 Federal Register Notice, "Withdrawal of a guide means that the guide should not be used for future NRC licensing activities."

It should be noted that the discussion of risk assessments performed to support maintenance has been expanded in NUMARC 93-01, Revision 4A, to include the latest industry guidance.

The following Travelers include references to RG 1.182 or a previous version of NUMARC 93-01. The noted changes should be made by licensees adopting these Travelers:

- TSTF-358-A, Rev. 6, "Missed Surveillance Requirements"
 - All plants have adopted TSTF-358, so changes to the Traveler, model Application, model Safety Evaluation, and implementation guide TSTF-IG-06-01 to replace references RG 1.160 with RG 1.182, and to update the NUMARC 93-01 revision, are not required.
 - The Improved Standard Technical Specifications (ISTS) SR 3.0.3 Bases reference RG 1.182 and a previous version of NUMARC 93-01. The Bases should be revised to reference RG 1.160 in lieu of RG 1.182.
- TSTF-359-A, Rev. 9, "Increase Flexibility in Mode Restraints"
 - The justification of TSTF-359 references specific subsections and quotes from Section 11 of NUMARC 93-01. This information may not be the same in Revision 4A of NUMARC 93-01, but the two versions both provide appropriate guidance to perform risk assessments in accordance with 10 CFR 50.65(a)(4).

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The use of RG 1.160 in lieu of RG 1.182 should be noted in the plant-specific application.

- TSTF-423-A, Rev. 1, "Technical Specifications End States, NEDC-32988-A"
 - The justification references RG 1.182 and a previous version of NUMARC 93-01. This information may not be the same in Revision 4A of NUMARC 93-01, but the two versions both provide appropriate guidance to perform risk assessments in accordance with 10 CFR 50.65(a)(4). The use of RG 1.160 in lieu of RG 1.182 should be noted in the plant-specific application.
 - The model application contains commitments to follow the guidance established in Section 11 of NUMARC 93-01, Revision 3, July 2000. It also contains a commitment to follow the guidance in implementation guide TSTF-IG-05-02, Revision 1, which references RG 1.182 and NUMARC 93-01. The exception to follow RG 1.160 and Revision 4A of NUMARC 93-01 should be noted in the plant-specific application.
 - The implementation guide for TSTF-423, TSTF-IG-05-02, references RG 1.182 and a previous version of NUMARC 93-01. It should be annotated or revised by the TSTF.
- TSTF-427-A, Rev. 2, "Allowance for Non-Technical Specification Barrier Degradation on Supported System Operability"
 - The justification references RG 1.182 and a previous version of NUMARC 93-01. This information may not be the same in Revision 4A of NUMARC 93-01, but the two versions both provide appropriate guidance to perform risk assessments in accordance with 10 CFR 50.65(a)(4). The use of RG 1.160 in lieu of RG 1.182 should be noted in the plant-specific application.
 - The model Safety Evaluation references RG 1.182 and a previous version of NUMARC 93-01. The difference should be noted in the licensee's application. The NRC should acknowledge the difference when preparing the plant-specific Safety Evaluation.
 - The model application contains commitments to follow the guidance established in Section 11 of NUMARC 93-01, Revision 2. It also contains a commitment to follow the guidance in implementation guide NEI 04-08, which references RG 1.182 and NUMARC 93-01. The exception to follow RG 1.160 and Revision 4A of NUMARC 93-01 should be noted in the plant-specific application.
 - The ISTS LCO 3.0.9 reference RG 1.182 and a previous version of NUMARC 93-01. The Bases should be revised to reference RG 1.160 in lieu of RG 1.182.
 - The implementation guide for TSTF-427, NEI 04-08, references RG 1.182 and a previous version of NUMARC 93-01. It should be annotated or revised by NEI.

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- TSTF-431-A, Rev. 3, "Change in Technical Specifications End States, BAW-2441"
 - The justification references RG 1.182 and a previous version of NUMARC 93-01. This information may not be the same in Revision 4A of NUMARC 93-01, but the two versions both provide appropriate guidance to perform risk assessments in accordance with 10 CFR 50.65(a)(4). The use of RG 1.160 in lieu of RG 1.182 should be noted in the plant-specific application.
 - The model application contains commitments to follow the guidance established in Section 11 of NUMARC 93-01, Revision 3, July 2000. It also contains a commitment to follow the guidance in implementation guide TSTF-IG-07-01, which references RG 1.182 and NUMARC 93-01. The exception to follow RG 1.160 and Revision 4A of NUMARC 93-01 should be noted in the plant-specific application.
 - The implementation guide for TSTF-431, TSTF-IG-07-01, references RG 1.182 and a previous version of NUMARC 93-01. It should be annotated or revised by the TSTF.
- TSTF-432-A, Rev. 0, "Change in Technical Specifications End States, WCAP-16294"
 - The model Safety Evaluation references RG 1.182 and a previous version of NUMARC 93-01. The difference should be noted in the licensee's application. The NRC should acknowledge the difference when preparing the plant-specific Safety Evaluation.
- TSTF-439-A, Rev. 2, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO"
 - The justification references RG 1.182 and a previous version of NUMARC 93-01. This information may not be the same in Revision 4A of NUMARC 93-01, but the two versions both provide appropriate guidance to perform risk assessments in accordance with 10 CFR 50.65(a)(4). The use of RG 1.160 in lieu of RG 1.182 should be noted in the plant-specific application.
- TSTF-454, Rev. 2, "Extend PCIV Completion Times, NEDC-33046"
 - TSTF-454, Rev. 1, was approved by the NRC on December 13, 2005, but will not be adopted by licensees. TSTF-454, Rev. 2, is currently under review by the NRC. The Traveler justification will be revised to reference RG 1.160 and Revision 4A of NUMARC 93-01 instead of RG 1.182.

It is recommended that licensees adopting these Travelers include a statement similar to the following in the application section, "Applicability of Published Safety Evaluation":

On November 27, 2012, the NRC published a Federal Register Notice stating that RG 1.182 has been withdrawn and the subject matter has been incorporated into RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." RG 1.160

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endorses Revision 4A of NUMARC 93-01, dated April 2011. TSTF-XXX [and the proposed Bases], [the model application [and commitments]], [the model Safety Evaluation], [and the implementation guidance] reference Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," which endorses the February 2000 version of NUMARC 93-01, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." References and commitments to RG 1.182 in these documents are assumed to refer to RG 1.160 and Revision 4A of NUMARC 93-01 instead of RG 1.182. [References to RG 1.182 in the Technical Specifications Bases [and model application] have been revised to refer to RG 1.160.]

No action is required by licensees that have previously adopted Travelers that reference or include commitments to RG 1.182. As stated in the Notice, "The withdrawal of RG 1.182 does not alter any prior or existing licensing commitments or conditions based on its use or reference."