

March 22, 2015

Mr. Thomas Zachariah  
Project Manager  
Nuclear Energy Institute  
1201 F Street, NW, Suite 1100  
Washington, DC 20004

SUBJECT: NRC STAFF COMMENTS ON NUMARC 93-01, DRAFT REVISION 4C,  
"INDUSTRY GUIDELINE FOR MONITORING THE EFFECTIVENESS OF  
MAINTENANCE AT NUCLEAR POWER PLANTS"

Dear Mr. Zachariah:

The purpose of this letter is to offer clarifying language to NUMARC 93-01, Draft Revision 4c, provided to the U.S. Nuclear Regulatory Commission (NRC) staff on December 14, 2015 (ML15350A185), for consideration and endorsement through Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." NUMARC 93-01 was developed to establish guidance for licensees to meet 10 CFR 50.65 "Requirement for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants."

NUMARC 93-01, Draft Revision 4c, included new language in Section 8.2.1.3 that addresses the treatment of structures, systems and components only described in FLEX Support Guidelines (FSGs), Severe Accident Management Guidelines (SAMGs), and Extensive Damage Management Guidelines (EDMGs). The NRC staff has reviewed the proposed revision and recommends that the language be revised as indicated in the Enclosure to this letter.

If you have any questions concerning this letter, please contact Ms. Ami Patel of my staff at 301-415-8310, or via email to [Ami.Patel@nrc.gov](mailto:Ami.Patel@nrc.gov).

Sincerely,

/RA/

Scott A. Morris, Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

Enclosure: As stated

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**NRC Staff Comments on NUMARC 93-01, Draft Revision 4c, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"**

**Problem Statement:** The industry seeks to better define the applicability of the Maintenance (10 CFR 50.65) Rule (MR) to exclude non-safety-related structures, systems, or components or equipment that either functions exclusively in meeting the requirements of EA 12-049 "Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," (ML12054A736) and/or the proposed rule for mitigating strategies (10 CFR 50.155) for dealing with Beyond Design Basis External Events (BDBEE) herein called Beyond Design Basis External Event Mitigating Strategies (BDBEEMS) (Note: Diverse and Flexible Coping Strategies (FLEX) Support Guidelines (FSGs) are a subset of BDBEEMS). Diverse and Flexible Coping Strategies Support Guidelines, Severe Accident Management Guidelines (SAMGs), and Extensive Damage Management Guidelines (EDMGs) include multiple functions that can include performance in the Emergency Operating Procedures as well as performance in the FSGs, SAMGs, and EDMGs. The industry seeks to exclude only the FSG, SAMG, or EDMG functions from the scope of the MR.

**NRC proposed language to be added to Section 8.2.1.3 of NUMARC 93-01 to replace NEI proposed language:**

- Any non-safety-related structure, system, or component (SSC), or equipment described in Diverse and Flexible Coping Strategies (FLEX) Support Guidelines (FSGs), Severe Accident Management Guidelines (SAMGs), or Extensive Damage Management Guidelines (EDMGs) that are relied upon by the licensee to mitigate accidents or transients or are used in the plant Emergency Operating Procedures (EOP) are within the scope of the MR. However, any non-safety-related SSC or equipment that is relied upon by the licensee solely for functions in the FSGs, SAMGs, or EDMGs, even if referenced in an EOP is not required to be within the scope of the MR.
- The integration of the FSGs with the EOPs as would be required by the proposed rule for mitigating strategies (10 CFR 50.155) does not obviate MR requirements. SSCs or equipment described only in the FSGs for the sole purpose of meeting the requirements of the proposed rule for mitigating strategies (10 CFR 50.155) would not be within the scope of the MR unless the FSGs are being used for performance of an EOP mitigating function or required by a different portion of paragraph 50.65(b).

At the end of the section, NEI should provide examples to clarify applicability of this guidance.

Enclosure