



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 24, 2017

Mr. William A. Horin  
Winston & Strawn  
Counsel to the Nuclear Utility Group on  
Equipment Qualification  
1700 K Street, N.W.  
Washington, D.C. 20006-3817

SUBJECT: COMMENTS OF THE NUCLEAR UTILITY GROUP ON EQUIPMENT  
QUALIFICATION REGARDING DESIGN BASIS ASSURANCE  
EQUIPMENT QUALIFICATION PROGRAM INSPECTION  
PROCEDURE

Mr. Horin:

I am responding to your letter of October 8, 2017, in which you provided comments of the Nuclear Utility Group on Equipment Qualification ("NUGEQ") related to the Nuclear Regulatory Commission's (NRC's) Equipment Qualification (EQ) Program inspection process.

NUGEQ's comments focused on a perceived lack of conformance of the ongoing inspections with the overall intent of the assessments noting, in part, that some of the NRC inspectors' approaches are contrary to historical treatment of EQ licensing bases topic areas, present generic backfit implications and in some cases have significantly increased licensee resource expenditures.

The NRC is aware of NUGEQ's concerns. We are seeking to better understand and address the issues raised by NUGEQ through continued interactions during meetings such as the recent 2017 EQ Technical Meeting in Clearwater Beach, Florida, November 8-10, 2017. We plan to further address these concerns during the upcoming public meeting to be held at NRC Headquarters on December 13, 2017. You noted the need for staff training in the area of backfit. The NRC's Executive Director for Operations tasked the NRC's Committee to Review Generic Requirements (CRGR) to lead the development and execution of near-term backfit training to staff and managers. Mandatory backfit training for all Office of Nuclear Reactor Regulation technical staff and managers has been scheduled during the months of December of 2017, and January 2018. Regional inspectors and managers will also receive their mandatory backfit training as scheduling permits. I am confident that we can continue to enhance understanding of the NRC's approach to EQ inspections from our continued interactions.

Sincerely,

***/RA Michael King Acting for/***

Christopher G. Miller, Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

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PROCEDURE DATED NOVEMBER 24, 2017

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