



NUCLEAR ENERGY INSTITUTE

12/20 #1  
Action: Beckner  
cc: J. Matthews

**Ralph E. Beedle**  
SENIOR VICE PRESIDENT AND  
CHIEF NUCLEAR OFFICER,  
NUCLEAR GENERATION

December 15, 1999

Mr. Samuel J. Collins  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Collins:

The NRC's ongoing effort to achieve broad improvements to technical specifications through the use of risk insights is a timely and important initiative. The industry strongly supports this effort, and believes it will provide significant plant operational benefits and improved safety focus. Although NRC and industry resources are heavily committed to achieving risk-informed improvements in many significant areas, we must ensure the technical specification effort receives sufficient priority. The importance is heightened by the timely opportunity to correlate this effort with the maintenance rule configuration assessment rulemaking.

Section (a)(4) of the maintenance rule (10 CFR 50.65) will be amended next year to require performance of configuration risk assessments for online and shutdown maintenance activities. This is a significant rulemaking, establishing a regulatory requirement to assess the safety impact of the plant configuration, and to take risk management actions to mitigate temporary risk impacts. NRC staff and industry have reached agreement on a draft industry guideline for implementation of the rulemaking, as discussed in a Commission briefing on November 10, 1999. The draft guideline has been forwarded to NRC and will be subjected to a public comment period, with the expectation that it be endorsed by the NRC.

The (a)(4) requirements for configuration assessment and risk management actions will impact many areas that are also addressed by the ongoing technical specifications reform effort. These areas include equipment out-of-service times, surveillance testing, action requirements, mode change decisions with equipment out-of-service, and end state determinations with equipment out-of-service. Industry's previous comments on the rulemaking noted a need for reconciliation of the rulemaking with technical specifications requirements. The seven technical specifications reform objectives identified by NRC staff and industry are a timely and appropriate mechanism to achieve a large part of this purpose, without the need for additional rulemaking.

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The NRC Technical Specifications branch has demonstrated a proactive approach in pursuing these improvements. We will continue to support this effort, and believe it would be particularly beneficial for the NRC staff and industry to work towards the goal of utilizing the (a)(4) assessments and actions to provide a substantial element of the justification for the proposed changes to Improved Standard Technical Specifications. With the promulgation of the revised maintenance rule, we believe industry interest in obtaining the corollary technical specification improvements should be very high.

We would be pleased to meet with you to discuss strategies and resource prioritizations to enable a positive and timely outcome of this effort. Please contact me in this regard, or if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ralph E. Beedle', written over a horizontal line.

Ralph E. Beedle

c: W. Beckner  
G. Holahan  
R. Barrett  
T. Quay  
B. Boger