

**Parks, Jazel**

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**From:** Bayssie, Mekonen  
**Sent:** Monday, June 07, 2010 11:22 AM  
**To:** Lin, Bruce  
**Cc:** Burke, John  
**Subject:** FW: Need to find Staff contacts for three Reg Guides  
**Attachments:** Letter to S.Burns 6\_10.pdf; Response to 2010 NEI Backfit GM1 .docx

Lin,

Please look at the letter that specifies to your guide. It is cited 9 on page 3.

Mekonen

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**From:** Valentin, Andrea  
**Sent:** Monday, June 07, 2010 9:52 AM  
**To:** Bayssie, Mekonen  
**Subject:** FW: Need to find Staff contacts for three Reg Guides

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**From:** Mizuno, Geary  
**Sent:** Friday, June 04, 2010 3:31 PM  
**To:** Valentin, Andrea; Jervy, Richard  
**Subject:** Need to find Staff contacts for three Reg Guides

Andrea and Rick:

In the attached pdf document is a letter submitted to NEI raising backfitting questions on the issuance of regulatory guides. In particular, in footnote 9 on page 3, they raise concerns about the backfitting discussion for DG-1242 (Coatings); RG 1.11, Rev. 1 (Instrument Lines Penetrating Containment); and RG 1.47 (Bypassed and Inoperable Status Indication).

It is important for me to contact the staff individuals who were substantively responsible for the technical content of the RGs. Can you advise me who these individuals are and their phone numbers and organizations? I need to verify the following (taken from the Word document which represents a draft response to the NEI letter):

**The backfitting discussions for the three regulatory guides cited in your letter (p. 3, footnote 9) are consistent with the discussion on "forward fit" regulatory guides. The staff has advised us that they do not intend to impose the positions in these three regulatory guides on any current nuclear power plant licensee in the absence of a voluntary request to change their licensing basis that directly implicates the safety issues addressed in the regulatory guides.**

Thanks.

Geary

## **REGULATORY ANALYSIS**

### **Statement of the Problem**

The guidance in RG 1.54 (June 1973) has become outdated because the ANSI standards endorsed by the guide have been withdrawn and replaced by ASTM standards. The NRC issued Revision 1 to RG 1.54 in July 2000 to provide NRC endorsement and regulatory positions on ASTM standards as applicable to NPP protective coatings. Since the issuance of Revision 1 to RG 1.54, many of the ASTM standards endorsed by RG 1.54 have been updated to reflect the current industry practice. The most cost-beneficial method to update the guidance in RG 1.54 would be to issue a revision of RG 1.54 that would endorse updated ASTM standards.

### **Objective**

The objective of this regulatory action is to provide NRC endorsement and regulatory positions on the updated ASTM standards relevant to NPP protective coatings.

### **Alternative Approaches**

The NRC staff considered the following alternative approaches:

Do not revise Regulatory Guide 1.54. Revise Regulatory Guide 1.54.

#### Alternative 1: Do Not Revise Regulatory Guide 1.54

Under this alternative, the NRC would not revise this guidance, and the original version of this regulatory guide would continue to be the available guidance. This alternative is considered the baseline or “no-action” alternative and, as such, involves no value or impact considerations. However, this alternative would not facilitate the licensees to use the current ASTM standards.

#### Alternative 2: Revise Regulatory Guide 1.54

Under this alternative, the NRC would revise Regulatory Guide 1.54 to endorse the updated ASTM standards applicable to NPP protective coatings.

One benefit of this action is that it would facilitate licensees to use the updated ASTM standards for the selection, qualification, application, and maintenance of protective coatings in NPPs.

The cost to the NRC would be the one-time cost of issuing the revised regulatory guide (which is expected to be relatively small), and applicants would incur little or no cost.

### **Conclusion**

Based on this regulatory analysis, the NRC staff recommends revision of Regulatory Guide 1.54. The staff concludes that the proposed action will allow licensees to use the updated ASTM standards for the selection, qualification, application, and maintenance of protective coatings in NPPs.