

Background – MSPI-05 The survey respondents requested a revision to the guidance for reporting maintenance induced failures caused by damage or other issues caused by the maintenance activity and identified during PMT performed prior to restoring the component to operable status. The survey response matches the concerns raised during the reviews and appeal of FAQ 428. The conduct of maintenance activities involves numerous support activities during which a failure may be introduced. These failures will most likely be identified during the post maintenance testing and are not independent of the maintenance performed. Therefore they should not be counted as they are **not** indicative of the reliability of the equipment that was undergoing maintenance.

Recommended Change to NEI 99-02

Page F-26, line 34 - Insert the following new section

Treatment of failures discovered during post maintenance tests:

Failures identified during post-maintenance tests (PMT) are not counted unless the cause of the failure was independent of the maintenance performed. The maintenance performed includes the activities required to be performed to conduct and support the maintenance, including support activities, the actual maintenance activities, and all activities required for restoration of the monitored component(s) to their available and operable condition. This includes, but is not limited to, typical tasks such as scaffolding erection and removal, coatings applications, insulation removal and installation, rigging activities, health physics activities, interference removal and restoration, as required to support and perform the required maintenance activity. **However, failures that go undetected at the time of their occurrence, which are not part of the scope of work, are counted as valid MSPI failures. Failures that occur as a result of the maintenance or support activities within the scope of work and are revealed and identified prior to the equipment's return to service, are not counted unless the failure remains undetected after the equipment has been returned to service.** System or component failures introduced during these activities are not indicative of the reliability of the equipment, since they would not have occurred had the maintenance activity not been performed. Such failures are not counted providing they are identified during or prior to the post-maintenance testing and are corrected prior to the component(s) being returned to operable status, with the repair documented in a work package. Support activities may be planned, scheduled and implemented on separate work orders from the work order for the monitored component(s). If the component was considered to be available during the PMT, unavailability shall be counted from the time the component was declared available. The example below illustrates that six hours of unavailability would be counted for a PMT failure caused by the maintenance activity.

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Maintenance Activity - Component Unavailable		PMT Failure		Component Available
1200	2400 0001			0600