

D921015

Mr. James M. Taylor
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: PROPOSED GUIDANCE FOR IMPLEMENTATION OF THE MAINTENANCE
RULE, 10 CFR 50.65

During the 390th meeting of the Advisory Committee on Reactor Safeguards, October 8-10, 1992, we reviewed the NRC staff's proposed documents that provide guidance regarding implementation of the maintenance rule, 10 CFR 50.65. This rule is to become effective on July 10, 1996. Our Maintenance Practices and Procedures Subcommittee considered this matter during its October 6, 1992 meeting. During these meetings, we had the benefit of discussions with representatives of the NRC staff and NUMARC, and of the documents referenced.

The package of documents, which consists of a proposed regulatory guide and other supporting documentation, describes the staff proposal to endorse an industry consensus guidance document (Draft NUMARC 93-01) to implement the maintenance rule. The industry has a demonstration program in progress involving implementation of this guidance at nine nuclear power plants. The staff points out that its endorsement of this document maximizes "the leadership role of the industry in the area of maintenance." The staff believes that, "The performance based, results oriented characteristics of the maintenance rule make industry cooperation vital to successful implementation of the rule."

We agree with the staff's position and recommend that this package be issued for public comment.

We plan to review the staff's proposed final implementation guidance for the maintenance rule after the staff has resolved public comments, and to provide our comments to the Commission.

As presently proposed, the scope of the monitoring program with regard to the electrical connections to the utility transmission network is unclear. We recommend that the staff's final guidance be extended to include the switchyards.

During our meeting, we asked the staff to describe the progress it had made on developing guidance to the industry for implementing a maintenance program to satisfy the maintenance rule, and which also addresses the requirements of the license renewal rule. We had raised the issue of the need for such guidance in our August 17, 1992 letter to you on license renewal. Based on our discussions with the staff, we believe that continuing senior staff management attention to this issue is needed in the interest of coherence in the regulatory process. We also note that the reliability

assurance programs being required of ALWR licensees will involve the establishment of a third kind of maintenance program. Consistent staff guidance is needed on the elements of an acceptable program that will satisfy these three sets of requirements.

Sincerely,

David A. Ward
Chairman

References:

1. Memorandum dated September 9, 1992, from C. J. Heltemes, Jr., Office of Nuclear Regulatory Research, for Raymond F. Fraley, ACRS, Subject: Transmittal of a Proposed Public Comment Package Regarding Implementation Guidance for the Maintenance Rule, 10 CFR 50.65, with Enclosures
2. Memorandum dated May 5, 1992, from Jack W. Roe, Office of Nuclear Reactor Regulation, for Addressees, Subject: A Comparison of Maintenance and License Renewal Rules, with Enclosure
3. Draft NUMARC 93-01, Revision 2A, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated July 1992