

NOTATION VOTE

RESPONSE SHEET

cc: Stello
Taylor

FYI: Murley, NRR
JJankovich, NRR

TRehm

TO: SAMUEL J. CHILK, SECRETARY OF THE COMMISSION

FROM: COMMISSIONER CARR and COMMISSIONER ROGERS

SUBJECT: SECY-87-314 - INTERIM POLICY STATEMENT ON
MAINTENANCE OF NUCLEAR POWER PLANTS

APPROVED x w/comments DISAPPROVED _____ ABSTAIN _____

NOT PARTICIPATING _____ REQUEST DISCUSSION _____

COMMENTS: See attached.

NOTE: This supersedes Commissioner Carr's vote sheet of 1/19/88 on
SECY-87-314 and represents the combined views of Commissioner Carr
and Commissioner Rogers.

Kenneth M. Carr

SIGNATURE

1-25-88

DATE

Kenneth C. Rogers

SIGNATURE

1/25/88

DATE

ENTERED ON "AS"
NRC-SECY FORM MAY, 1987

9305070275 911031
PDR ADDCK 05000410
S PDR

20275



09/02/00

Commissioner Carr and Rogers' comments on SECY-87-314

1. We approve staff's recommendations to issue a Policy Statement on Maintenance. However, we would modify the staff's proposal as reflected in the attached draft Policy Statement.
2. We propose this Policy Statement be issued as a final, not interim, Policy. We do not see the need for public comment on the issuance of this Policy, but would welcome it during subsequent rulemaking.
3. Our proposed Policy deletes any reference to a two year trial period to assess industry initiatives. We believe a rule is necessary in this important area regardless of industry initiatives in place at present. We are confident that a rule can be developed that spells out this agency's expectations in maintenance within the framework of the attached Policy, yet still encourages industry initiatives to achieve excellence. We propose that staff be directed to develop a notice of proposed rulemaking for Commission review no later than August 1, 1988. In doing so, staff should work closely with NUMARC, should consider maintenance approaches in other countries, and should review practices in other industries and regulatory bodies in this country that place a heavy reliance on equipment reliability and availability.
4. While we value the advice of the ACRS, in this instance we would not delay issuance of the Policy for their formal review, estimated to be in mid-February. Instead, staff should periodically brief the ACRS and seek their input during the development of the rule. Additionally, we would ask SECY to work closely with the EDO and the ACRS staff in scheduling Commission review of major issues such as this so that sufficient time is available for ACRS input.
5. The attached proposed Policy is silent on the subject of staff maintenance inspections. While we continue to believe that inspections over the next two years of maintenance programs in place at 75 percent of the utilities is unnecessary, staff should nonetheless continue to assign inspection resources to those plants needing help in this area. Additionally, we would encourage staff to conduct other visits, as necessary, to gain information for development of the rule.
6. Finally, it was mentioned at the meeting that serious consideration was being given to the use of LER cause codes as a maintenance performance indicator. We do not believe this indicator would be useful since it is subjective and subject to data manipulation. We would urge staff to continue their efforts to develop maintenance indicators that are more quantifiable and meaningful.



POLICY

Background

The Commission has a program to continually evaluate the operational performance of nuclear power plants. Analysis of operational events has shown that, in some cases, nuclear power plant equipment is not being maintained at a level which ensures, with a high degree of reliability, that the equipment will perform its intended function when required. A limited NRC examination of nuclear power plant maintenance programs has found a wide variation in the effectiveness of these programs. Inadequate maintenance at some plants has been a significant contributor to plant reliability problems and, hence, is of safety concern. The Commission believes safety can be enhanced by improving the effectiveness of maintenance programs throughout the nuclear industry. The Commission is proceeding with rulemaking consistent with this belief. This policy statement is being issued to provide guidance to the industry while the rulemaking proceeds.

Policy Statement

It is the objective of the Commission that all components, systems and structures of nuclear power plants be maintained so that plant equipment will perform its intended function when required. To accomplish this



objective, each licensee should develop and implement a maintenance program which provides for the periodic evaluation, and prompt repair of plant components, systems, and structures to ensure their availability.

Definition of Maintenance

The Commission defines maintenance as the aggregate of those functions required to preserve or restore safety, reliability, and availability of plant structures, systems, and components. Maintenance includes not only activities traditionally associated with identifying and correcting actual or potential degraded conditions, i.e., repair, surveillance, diagnostic examinations, and preventive measures; but extends to all supporting functions for the conduct of these activities. These activities and functions are listed below under "Activities Which Form the Basis of a Maintenance Program".

Maintenance Programs

Each commercial nuclear power plant should develop and implement a well-defined and effective program to assure that maintenance activities are conducted to preserve or restore the availability, performance and reliability of plant structures, systems, and components. The program should clearly define the components and activities included, as well as the management systems used to control those activities. Further, the



program should include feedback of specific results to ensure corrective actions, provisions for overall program evaluation, and the identification of possible component or system design problems.

Activities Which Form the Basis of a Maintenance Program

An adequate program should consider:

- o Technology in the areas of
 - corrective maintenance,
 - preventive maintenance,
 - predictive maintenance,
 - surveillance;
- o Engineering support and plant modifications;
- o Quality assurance and quality control;
- o Equipment history and trending;
- o Maintenance records;
- o Management of parts, tools, and facilities;
- o Procedures;
- o Post-maintenance testing and return-to-service activities;
- o Measures of overall program effectiveness.



- o Maintenance management and organization in the areas of
 - planning,
 - scheduling,
 - staffing,
 - shift coverage,
 - resource allocation;
- o Control of contracted maintenance services;
- o Radiological exposure control (ALARA);
- o Personnel qualification and training;
- o Internal communications between the maintenance organization and plant operations and support groups;
- o Communications between plant and corporate management and the maintenance organization.

Maintenance recommendations or requirements of individual vendors should receive appropriate attention in the development of the maintenance program.

Future Commission Action

The Commission intends this policy statement to provide guidance to the industry in improving maintenance programs for their power reactor facilities. The Commission will continue to enforce existing requirements including those that address maintenance practices and will take whatever action that may be necessary to protect health and safety.



The Commission expects to publish a Notice of Proposed Rulemaking in the near future that will establish basic requirements for plant maintenance programs. We believe that the contents and bounds of the proposed rule will fall within the general framework described in this policy statement. Consideration will also be given to industry-wide efforts that already have been initiated. We encourage interested parties to provide their views on this important subject to the Commission, even at this early stage of the rulemaking process. Any notice of proposed rulemaking that is published will provide, of course, a period for public comment on its contents.

