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SUBJECT: Forwards comments on NRC draft maint insp procedure.

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Director of Nuclear Reactor Regulation
Attention: Mr. Thomas Foley, Senior Operations Engineer
Division of Reactor Inspection and Licensee Performance
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON NRC DRAFT MAINTENANCE
INSPECTION PROCEDURE
PLA-4117 FILES R41-2/A17-11

Docket Nos. 50-387
and 50-388

Dear Mr. Foley:

Attached are Pennsylvania Power & Light Company's comments on the NRC's draft Maintenance Inspection Procedure.

If you have any questions regarding our comments, please contact Mr. William W. Williams at (610) 774-5610.

Very truly yours,


R. G. Byram

Attachment

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES
Mr. R. J. Clark, NRC Sr. Project Manager - Rockville

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PENNSYLVANIA POWER & LIGHT CO. COMMENTS ON NRC DRAFT MAINTENANCE INSPECTION GUIDE

Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
1	-	-	<p>PP&L strongly recommends that the NRC Staff consider implementing the same regulatory "phase - in approach" as that used for 10 CFR 20 (10 CFR 20.1101, first set of questions, question # 62).</p> <p>That is, for the first year after the effective date of the Maintenance Rule, have any proposed notices of violation be reviewed by NRC Staff to ensure it is consistent with the guidance on the maintenance rule. This notice of violation should be approved by the NRC Staff during the one year period. This, effectively, would be a training process for the NRC Regions and inspectors to ensure reasonably consistent application of the intent of the Maintenance Rule throughout the nuclear industry, for this results-based regulation.</p>
2	-	-	<p>Confirm that the effective date of this inspection guide is July 10, 1996.</p>
3	1	25	<p>Regarding the "inspector" referenced in this procedure: is it anticipated that an NRC inspection team will be performing the pilot inspections in 1995 time frame? In addition, is it the NRCs strategy that after July 10, 1996, there will be no special NRC inspection teams strictly used for evaluating maintenance rule compliance, and that the resident inspector will be responsible to use this inspection guide on an on going basis?</p>
4	-	-	<p>The definition of the term "SSC" should be established for the inspection guide. PP&L's interpretation of the term "SSC" is those Systems/Divisions that are "in scope" of the maintenance rule, based on the five criteria in NUMARC 93-01, and those Systems/Divisions that are "risk significant", a more important subset of "in scope" Systems/Divisions based on the Individual Plant Evaluation. It should be actively stated that those "SSCs" not "in scope" are OUTSIDE the scope of this inspection guide.</p>
5	1	35-39	<p>It is stated that on-site inspection to evaluate maintenance effectiveness (02.01) should include review of equipment history records, and other documentation to determine if the licensee maintenance program is effectively controlling the performance and condition of SSCs at that plant. This appears to be more prescriptive or subjective in nature than results or performance based. PP&L recommends that this section be re-written as follows:</p>

PENNSYLVANIA POWER & LIGHT CO. COMMENTS ON NRC DRAFT MAINTENANCE INSPECTION GUIDE

Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
5 (cont'd)			<p><i>02.01 Review the plant's periodic maintenance effectiveness assessment (as defined in NUMARC 93-01 section 12.0) in order to determine if the licensee has established performance criteria for monitoring "in scope" and "risk significant" SSCs. In addition, evaluate the licensee's actual performance against his predefined action levels for these performance criteria to determine if the licensee is effectively controlling the performance of "in scope" and "risk significant" SSCs. If it appears that the licensee did not properly address the Maintenance Rule, or if a significant number of SSC performance criteria are not meeting performance levels established by the licensee, further inspection of the licensee's maintenance program and verification of Maintenance Rule compliance may be warranted (go to section 02.02). NOTE: This review SHOULD NOT INCLUDE SSCs that are OUTSIDE the scope of the licensee's maintenance rule program.</i></p> <p>If it is NRCs intent to only perform a Maintenance Rule compliance inspection (02.02, 03.02) for only those licensees that are poor maintenance performers as observed per the above, PP&L recommends this be so stated clearly in the inspection guide.</p>
6	1	26-27	<p>Regarding the option of performing step 2.02 (verifying implementation of the Maintenance Rule) PP&L interprets this to say that if through a summary review of performance criteria it is observed by the inspector that the licensee has an effective maintenance program, then a full maintenance rule compliance inspection does not have to be done by the inspector. Is this the intent?</p> <p>PP&L believes this to be a very positive statement and recommends that it remain in the inspection guide.</p>
7	2	24	<p>The term "low risk significance" is not understood. Either an SSC is "risk significant", or it is not. Recommend deleting this term from this line, and from the inspection guide in its entirety. It adds no meaning with regard to the maintenance rule.</p>
8	2-3	51-3	<p>02.03. Recommend not separating the Emergency Diesel Generators out from the Maintenance Rule proper. PP&L believes 02.03 could be deleted, and that 02.01 is applicable to the EDGs if they are "in-scope" or "risk significant" for a particular plant. This is similar to comment 39.</p>

Attachment to PLA-4117

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
9	3	22-24	As discussed at the previous maintenance inspection guide workshop (for the previous revision of the inspection guide), PP&L believes that the inspectors should obtain formal training on the Maintenance Rule from the NRC before they are allowed to inspect to this procedure. This training should include, as a minimum, a detailed review of the maintenance rule (10 CFR 50.65), NUMARC 93-01, Reg. Guide 1.160, and the "questions and answers" developed by NUMARC and NRC from the August, 1993 Workshops. The inspectors should also be trained on the concept of performance or results-based regulation, and methods of inspection for this type of regulation. PP&L believes this is critical since this is a new approach, and NRC inspectors will experience a learning curve for inspecting this new type of regulation.
10	3	24-26	Revise this sentence to read: <i>The inspector should be made aware that licensees may use methods other than those described in NUMARC 93-01 to satisfy the requirements of the maintenance rule, and that this is acceptable if plant and system performance is meeting the licensee established performance criteria and action levels for that criteria.</i>
11	3	35-37	Recommend deleting this sentence. Event review programs at utilities consider significant failures at all stations, not just those with similar NSSS designs. This sentence suggests that a new type of industry review program may be required for those plants with similar NSSS designs. PP&L believes this statement may be misleading to utilities and cause them to spend a significant amount of resources to address it.
12	3	28-34	PP&L believes this is good direction to the inspectors, and that it should be emphasized in the training to inspectors (see comment 9).
13	4	6-9	This states that utilities have the option of placing all SSCs in (a)(1) and monitoring them. It appears appropriate to consider that if a utility monitors parameters such as availability, reliability, and MPFF that is has, in fact, opted to place all SSCs in (a)(1) of the rule and monitor the actual performance of those SSCs against action levels defined by the licensee. Please clarify NRCs position on this.
14	4	26-30	The pertinent information for determining effectiveness of maintenance is the performance criteria. These are factual information. Since some of the indicated sources of information are subjective in nature, the main source for observing if a maintenance program is effective is the plant's performance, as monitored by the licensee's performance criteria.

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
15	4	28	Remove reference to "equipment performance or condition trending data". This reference implies component level inspection, which is outside the scope of the Rule.
16	4	36-46	<p>As stated previously for section 02.01 on page 1 of the draft inspection guide, the guidance here appears to be very subjective and not results or performance based.</p> <p>It is recommended that this section be re-written to clarify to the inspector that a review of the performance criteria and actual performance against those performance criteria should be the sole basis for determining maintenance effectiveness. If Plant, system, and division performance is acceptable, then the it can be determined by the inspector that the licensee has an effective maintenance program.</p>
17	5	19-20	It is not at all clear what "preventive maintenance program results" have to do with determining risk. It is recommended this statement be deleted.
18	5	30	<p>Revise this line to read as follows:</p> <p><i>if the licensee appears to have reasonably identified risk significant SSC scope, and has a documented basis for the scoping.</i></p>
19	5	34-38	<p>The statement that "some monitoring at a component level may be required" is a concern. NUMARC 93-01 does not indicate that component level monitoring is required. It is recommended that this statement be deleted.</p> <p>PP&L does not intend to perform maintenance rule monitoring at the component level, which is in accordance with NUMARC 93-01.</p>
20	5	40-50	<p>Reference is made again to "less risk significant" or "more risk significant" systems. It is recommended that reference to this "grading" for risk significance be deleted.</p> <p>The "grading" of risk significant systems is not mentioned in NUMARC 93-01, and PP&L is not grading risk significant systems. Systems are either risk significant, or they are not. This statement of grading has no meaning, and could be confusing to the licensee and the inspector.</p>

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
21	6	3	Delete the words "or condition". The maintenance rule does not require or imply the requirement for condition monitoring. Condition monitoring has an entirely different meaning than "performance monitoring". It implies component level monitoring is required.
22	6	6-17	PP&L believes this is a very positive statement to the inspectors, and that it should remain in the guidance.
23	7	9-11	<p>PP&L interprets this statement to say that the licensee should have an operating experience review program. Since this idea is already stated in lines 1-7, this sentence is redundant and should be deleted.</p> <p>If the statement is meant to imply that plants must be aware of other plants' performance criteria and goals before establishing their own goals, PP&L does not believe this to be reasonable and recommends the statement be deleted.</p>
24	7	22-27	<p>PP&L considers that the concept of "evaluating the effectiveness of the corrective action" is achieved by having the SSC performance meet or exceed the established action level, if it fell below it. The statement as written implies that licensees should have a program that evaluates effectiveness of all corrective actions. In addition, it is recommended that the concept of a "clearly declining trend" be deleted. This can tend to be subjective. Inspectors should focus on the criteria, and look at those that have not achieved the criteria.</p> <p>It is recommended this section be re-written as follows:</p> <p><i>Where goals or action levels are not met, the inspector should examine the licensee's corrective actions to determine if the root cause or causal factors were identified, and if reasonable action was taken to correct the situation to prevent recurrence. The effectiveness of the corrective action is observed if the performance of the SSC has met or exceeded the action level defined by the licensee.</i></p>
25	8	10-17	The concept of "Maintenance Preventable Functional Failure" is going to be a major part of maintenance rule compliance. It is believed that a large part of the dialogue between utilities and the NRC will concern what was an MPFF, and a repetitive MPFF. However, no significant discussion or direction is provided to the inspector on this issue. It is recommended additional guidance be provided to the inspector, in the training program previously recommended.

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
26	many	many	The word "condition" is used many times throughout this draft inspection guide, usually in conjunction with "performance", and in "performance or condition". Other times the inspector is requested to observe the condition of equipment. Since the maintenance rule is "performance based", PP&L recommends the word "condition" be DELETED from this inspection guide.
27	9	37-43	<p>This statement indicates that licensees must make an active determination of what SSCs are inherently reliable that do not require any type of monitoring. Neither NUMARC 93-01, the Maintenance Rule, or Reg. Guide 1.160 imply that a determination of inherently reliable SSCs needs to be performed and documented.</p> <p>PP&L recommends this statement be deleted from the inspection guide.</p>
28	9	45	<p>Again, the term "low risk significance" is used. PP&L understands that an SSC is either risk significant, or it is not. The term low risk significance has no meaning.</p> <p>Did NRC Staff intend to say: "non-critical SSCs" or "SSCs not in scope of the Maintenance Rule"?</p>
29	9	47-55	<p>These lines discuss the issue of "run to failure". PP&L recommends that these lines be deleted and that the following <u>concepts</u> on the issue of run to failure be incorporated into the inspection procedure:</p> <ol style="list-style-type: none"> 1. Any System OUTSIDE the scope of the maintenance rule (and any component in these systems), by definition of the criteria, may be ALLOWED to run to failure by the licensee. This means that the licensee may choose to do little or no preventive maintenance on these. 2. Any component in an "in scope" or "risk significant" system or division may be allowed to run to failure, or fail, <u>if it does not affect the safety functions</u> of that system or division. 3. Documentation of a decision to let the components noted above run-to-failure shall not be required.
30	10	1-3	Delete statement, relative to comment no. 28.
31	10	52-54	<p>PP&L interprets this statement to say that the licensee should have an operating experience review program.</p> <p>If the statement is meant to imply that plants must be aware of other plants' periodic evaluations (meaning obtain copies of and review in detail), PP&L does not believe this to be reasonable. PP&L intends to perform its periodic assessment against its own performance criteria and action levels, not against other plants'. It is recommended this sentence be deleted.</p>

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
32	11 11 12	13-18 45-55 1-2	<p>PP&L disagrees with this statement STRONGLY. The inspector is requested to investigate PROCESSES and asks that the licensee provide examples of documented evaluations of balancing availability and reliability. Processes are not part of the maintenance rule - performance or results are. This implies some type of documentation for each and every decision to remove equipment from service. PP&L does not believe this is reasonable.</p> <p>PP&L believes that the PERFORMANCE CRITERIA will provide the inspector the knowledge of whether or not the utility is balancing availability and reliability. Again, is the PERFORMANCE indicating that the utility is not effectively balancing the two parameters? Revise the section (lines 13-18) to read as follows:</p> <p><i>The inspector should review the licensee established performance criteria and action levels for that performance criteria to determine if performance criteria is not being met because of plant scheduling philosophies (scheduling system out-of-service (OUT-OF-SERVICE (OOS)) windows during operating cycle).</i></p>
33	13	14-17	<p>This statement implies that licensees should do a "what if" analysis, although lines 26-29 state this is not the intent. This issue was clearly stated as not required by NRC personnel (Russell) at the Maintenance Rule Workshops in August, 1993. To prevent any misinterpretation, recommend DELETING lines 14-17 (first sentence of section (4) beginning on line 13).</p>
34	14	30-32	<p>Revise this sentence to read:</p> <p><i>The inspector should not expect that these particular SSCs, or any other SSCs, would be included within the scope of the maintenance rule if they do not meet the SSC scoping criteria defined in NUMARC 93-01.</i></p>

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35	15	10-13 19	<p>This statement implies that licensees must have a periodic process that reviews the SSC scope and verifies that no changes are needed due to mods or other plant configuration changes.</p> <p>In various documentation and verbally from Bill Russell at the August Workshops on the maintenance rule, it was indicated by the NRC that this type of mechanism would NOT be required. It was mentioned by NRC personnel that they believed the maintenance rule to be "self correcting". This concept states that if some critical SSC was not included in scope of the rule and subsequently failed, it would be obvious to licensees to add it to the scope.</p> <p>It is recommended that this concept be DELETED from the inspection guide, since previous guidance from NRC both verbally and in writing indicates this was not NRCs intent.</p>
36	15	21-25	<p>NRC stated that the Maintenance Rule is self-correcting: if a utility did not include an SSC in scope and then it failed, it would then be added to the scope based on its effect.</p> <p>This sentence implies there will be punitive measures taken if a utility did not include an SSC in scope. NRC (Russell) stated this would not be the case in the August, 1993 Workshops. The intent previously communicated by NRC personnel should be so stated in the inspection guide.</p>
37	-	-	<p>What is the role of the "Questions and Answers" that NUMARC and NRC are generating from the August Maintenance Rule Workshops? It is PP&L's understanding that NRC is "approving" the responses. Once issued, will this information be considered part of regulatory guidance for both the utilities and the inspectors?</p> <p>If so, it is recommended that the information in these answers be properly reflected in this inspection guide, and in the training program recommended in comment no. 9.</p>
38	Many	Many	<p>Footnote (4) on page 13 states that it is not intended that licensees establish new programs to satisfy the needs of the maintenance rule with regard to using industrywide operating experience. PP&L recommends this footnote apply to ALL items where utilizing industrywide operating experience is indicated throughout the inspection guide.</p> <p>Other references to using industry information throughout the inspection guide imply that utilities need to develop new programs. Applying this footnote to all such instances would clarify the intent for both licensees and inspectors.</p>

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Comment No.	Page No.	Line No.'s	COMMENTS/QUESTIONS
39	15-17	all	<p>Section 03.03 discusses Emergency Diesel Generator requirements with regard to the maintenance rule. It appears that NRC is attempting to inspect compliance of Station Blackout (SBO) Requirements of 10 CFR 50.63 into the Maintenance Rule.</p> <p>PP&L recommends that this entire section be deleted from the scope of this inspection procedure. It is redundant to previous sections of the inspection guide. Emergency Diesel Generators should be monitored by utilities if they meet the criteria for "in scope" or "risk significance" under the maintenance rule scoping requirements in NUMARC 93-01. This is similar to comment 8.</p>

