PUBLIC SUBMISSION

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Monitoring the Effectiveness of Maintenance at Nuclear Power Plants; Draft Regulatory Guide (DG) -1336

Comment On: NRC-2018-0131-0001
Monitoring Effectiveness of Maintenance at Nuclear Power Plants

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General Comment

What is the point then of including FLEX equipment in the risk analysis if it is not intended to be "relied upon?" Either it is
needed/credited or not. If it is so great, it should not have a high risk worth and be allowed to be monitored at the plant
level. This seems like an effort by the NRC to not include components in the Maint Rule that can have a clear nexus to
the survivability of a system, structure, or component important to safety.

It appears that the NRC is allowing the licensee to use training wheels, but pretending like they are not really needed,
to make the overall plant risk look better than it actually is, thus allowing this noncredited systems to support
permitting other "risk-informed" changes. What I am saying is that the proposed supports the credit when it helps,
but not when it hurts, thus obfuscating the real change in operational and plant risk for a proposed change.
How does that promote plant safety?

If the NRC is going to allow FLEX equipment is really intended to be used to mitigate for other than beyond design basis events, why
is this guide proposing to allow it not be monitored using the Maint Rule?

Where is the clarity that this document is supposed to provide? This is supposed to be draft regulatory guidance right? Where
is the four pages of discussion of FLEX as it applies to the actual rule? So, why don't you just provide criteria

for when
something should be included in the Maint Rule instead of all these examples of how not to meet the Maint
Rule.