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# COMMITTEE CORRESPONDENCE

committee: ANSI/ASME NQA  
Working Group on Maintaining,  
Repairing, and Inservice Inspection

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subject: WG Comments to Draft Reg Guide  
DG-1001, "Maintenance Programs for  
Nuclear Power Plants"

date: November 27, 1989

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to: Regulatory Publications Branch, USNRC

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8/17/89

The ANSI/ASME NQA Working Group on Maintaining, Repairing, and Inservice Inspection has reviewed the draft Regulatory Guide DG-1001, "Maintenance Programs for Nuclear Power Plants." As an industry group formed to develop quality assurance standards relevant to maintenance, we were very interested in your Reg Guide. Accordingly, we would like to offer the following comments:

1. Regarding level of detail, we do not believe the Reg Guide should provide any more detail as to methods for planning, conducting, and assessing the effectiveness of maintenance programs. We believe rather that it should remain a policy-type document, and licensees should have sufficient freedom to develop and experiment with various methods whose evolution will result in greater effectiveness than the NRC could achieve with any prescribed methods.
2. We are in agreement with the need and desirability to establish quantitative goals as described in Regulatory Position 3 of the draft regulatory guide; however, we cannot agree that "goals should be established with the objective of achieving a level of performance consistent with that achieved by the top performing U.S. plants of similar design." For one thing, the top performing plants may be doing more than is necessary "to prevent degradation or failure of and to promptly restore the intended function of, structures, systems, and components." Whether other plants choose to do more than necessary to meet the overall objective of a maintenance program should be a management decision and not a regulatory decision. Also, maintenance needs can vary between plants depending on factors such as environment, labor relations, location, etc.

Therefore, we are of the opinion that quantitative goals should be established which are unique to each plant and would be the best goals for assuring that plant's maintenance program meets the overall stated objective of the Reg Guide. If that objective is met, then it is completely irrelevant to compare performance of one plant against that of another.



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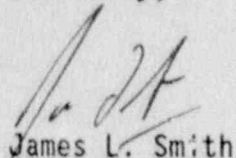
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3. It appears to us that this draft guide has failed to address the important issues of preserving the environmental and seismic qualifications of an item upon which maintenance is performed. In addition, some statement should be made about switching to the modification mode if design bases will be infringed upon or a change in design, materials, etc., should occur.
4. Section 5.2.3 states that maintenance indicators based on component failure data should be monitored. We do not believe that this will provide meaningful data. In fact, an overzealous PM program could cut down on the number of failures but leave the plant in a less safe condition by needlessly diverting money from other important areas or by increasing the likelihood of a single failure through a mistake made when unnecessary PM was being performed. Instead, we recommend other "leading indicators" be considered such as measuring performance degradation as a precursor to failure or measuring the amount of wear undergone by a part at PM as compared to at failure.
5. Predictive maintenance is addressed as a separate category of maintenance in the draft reg guide. We are of the opinion that predictive maintenance is a form of preventive maintenance or at least a subset of preventive maintenance. Taking the definition that you give for preventive maintenance in Section 4.6.1, it is clear that predictive maintenance meets the requirements of that definition. We therefore believe it should be addressed as a subtopic to the PM program.

If you have any questions, please contact me at the above address or telephone number. We invite the NRC's participation at our next meeting which will be conducted with the NQA Meetings in Baltimore, Maryland on April 23-26, 1990.

Sincerely,



James L. Smith  
Chairman, Working Group on Maintaining,  
Repairing, and Inservice Inspection

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