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**SYSTEM ENERGY RESOURCES, INC.**  
A Middle South Utilities Company

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Office of Administration  
Washington, D.C. 20555

November 30, 1989

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Attention: Document Control Desk

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Gentlemen:

8/17/89

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
Comments on NRC Draft Regulatory  
Guide DG-1001, Maintenance  
Programs for Nuclear Power Plants  
AECM-89/0213

As requested in your letter of August 1, 1989 System Energy Resources, Inc. (SERI) is providing comments to the draft Regulatory Guide DG-1001, "Maintenance Programs for Nuclear Power Plants." We request that you consider the following comments in your forthcoming issuance of the subject regulatory guide.

With respect to the Introduction to the draft regulatory guide, SERI agrees with the philosophy that safe operation of a nuclear power plant is directly dependent on the scope, depth and quality of the plant's maintenance program. This program should consider those planned and systematic actions required to prevent the degradation or failure of structures, systems and components or to promptly restore them to their intended function if failed. As noted in the Introduction, the NRC recognizes the need to allow flexibility for each licensee to structure and implement a maintenance program consistent with their specific plant design and organizational structure in order to achieve an effective maintenance program. SERI appreciates the NRC's recognition of this need and requests that this philosophy be equally applied in all areas of the proposed regulatory guide. This is of particular interest with regards to the NRC's approach and philosophy for establishing goals and measures for determining plant performance and maintenance indicators.

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In consideration of the NRC's general questions 4 and 5 of the August 1 letter, licensees should set goals and establish measures which will require the evaluation of both individual plant and industry-wide indicators to determine the effectiveness of maintenance activities and to identify improvements in their plant specific maintenance program. It is expected that licensees will commonly use many of the same overall plant performance indicators. However, licensees should not be restricted to a specific set of maintenance indicators.

High standards should be universally applied to all licensees to establish plant specific maintenance goals. The schedule for accomplishing these goals should be based on each utility's capability to establish an effective maintenance program. Each licensee's selection of maintenance indicators should be tailored around those factors that are most suitable in accomplishing these specific goals. The measurement process for accomplishing the licensee's maintenance program goals would be through monitoring improvements in the plant specific maintenance indicators.

With regard to Regulatory Position 5.2, SERI agrees with the NRC's general approach to monitoring of maintenance performance. However, this section needs to be modified to state that "each licensee should establish their plant specific maintenance indicators to best assure that their maintenance goals are being performed." SERI, as with other plant licensees, has been working with INPO to develop overall performance indicators for U.S. and international application. SERI encourages the NRC to adopt overall performance indicators that are consistent with those established by INPO. The performance indicators developed by INPO are based on specific industry operational performance and represent a collective industry knowledge base involving extensive insight into overall plant operations including quality maintenance programs. Maintenance indicators selected for licensee's plant specific program could be more closely correlated to a single universal set of overall plant performance indicators.

Regulatory Position 5.2 should also be modified to state that "NRC acceptance of the licensees program will be based on the implementation of maintenance goals based on plant specific maintenance indicators." SERI does not believe that the NRC should evaluate a licensee's maintenance program based on indicators which are inconsistent with those specifically established for a given plant. This approach could lead to reduced maintenance program quality due to the application of maintenance indicators that may not be appropriate to a particular licensee's maintenance approach.

As noted by the NRC in the Introduction of the draft regulatory guide, the licensee's maintenance program should be flexible based on their plant specific and organizational needs. In summary, SERI believes that this flexibility should also be retained in the application of maintenance indicators as discussed above.

In addition, SERI is an active participant in NUMARC and fully supports those comments being submitted separately by NUMARC on this regulatory guide. This includes the development of an Industry Action Plan which will consolidate various industry initiatives and actions in order to establish consistent maintenance program approaches. This plan intends to further enhance such areas as long range goal setting, performance monitoring techniques and self assessment along with other programmatic improvements currently underway. Even though it is recognized that additional industry work and improvements are needed in the area of maintenance planning and implementation, SERI believes that such efforts as the Industry Action Plan can serve to establish quality maintenance programs through industry initiated efforts.

SERI appreciates the opportunity to provide comments to the NRC on the draft regulatory guide.

Yours truly,

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