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Rules & Procedures Branch
Division of Rules & Records
Office of Administration
U. S. Nuclear Regulatory Commission
1717 H Street
Washington, DC 20555

(34)
54FR 33983
8/17/89
17 E 3 41

SUBJECT: Comments on Draft Regulatory Guide G-1001
"Maintenance Programs for Nuclear Power Plants"

Dear Sir:

Westinghouse has reviewed the Draft Regulatory Guide DG-1001, "Maintenance Programs for Nuclear Power Plants" and has reviewed the comments on DG-1001 developed by NUMARC. Westinghouse concurs with NUMARC's response.

Westinghouse agrees with the NRC position that improvements are necessary in the industry's approach to maintenance programs for safety related equipment in nuclear power plants. We believe that this general position is shared by all in our industry as evidenced by the large industry effort being directed to this area and by the significant progress made thus far.

The industry is now shifting to the use of a more programmatic approach to maintenance that provides a systematic rationale for maintenance decisions. This includes initiation by many utilities of such approaches as Reliability Centered Maintenance programs to systematically manage all maintenance tasks.

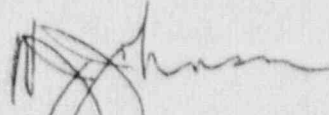
NUMARC is now developing an Industry Action Plan to lead an industry approach to improvement in maintenance programs. Westinghouse intends to support this plan through its involvement in the Owners Groups. It should be expected that such a plan will be just as successful as the industry program for the reduction of inadvertent reactor trips. The trip reduction program was successful in producing a significant reduction in the industry average trip rate and is an example of how effective the industry can be in addressing these types of issues.

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There has been much discussion on the possibility of a ruling on maintenance. Westinghouse believes that a rule on maintenance would not be productive at this time. The industry recognizes the need for improvement and is taking actions to formulate and implement a plan to address this need. As was the case for trip reduction, the industry should be given the flexibility to formulate an approach which best address the needs of each individual utility. The Industry Action Plan is the most appropriate vehicle for that purpose.

Very truly yours,



W. J. Johnson, Manager
Nuclear Safety Department

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