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December 4, 1989

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8/17/89

ATTN: Mr. Samuel J. Chilk  
Secretary of the Commission

Subject: Arkansas Nuclear One - Units 1 & 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Draft Regulatory Guide DG-1001,  
Maintenance Programs for Nuclear Power Plants

Gentlemen:

On August 1, 1989, the Nuclear Regulatory Commission requested comments on the Draft Regulatory Guide DG-1001, Maintenance Programs for Nuclear Power Plants. This letter transmits Arkansas Power & Light's (AP&L) comments on the proposed regulatory guide. AP&L supports the opinions expressed by the Nuclear Management and Resources Council, Inc. (NUMARC) on this proposed regulatory guide.

AP&L supports the philosophy of proper maintenance as an important part of safe and reliable nuclear power plant operation. AP&L has taken steps to upgrade maintenance personnel performance by constructing a new, well equipped Maintenance Facility, expanding and improving maintenance training, emphasizing good work practices, rewriting maintenance procedures to a standardized guide with emphasis on human factors, and upgrading our vendor technical manuals.

To continue the trend of improvements of maintenance activities at ANO, AP&L is participating in consolidated utility activities associated with EPRI, INPO, NUMARC, NSSS Owners Groups, and Codes and Standards Developing Organizations. These groups are addressing improvements in the areas of self assessment, performance monitoring, long-range goals, training, equipment reliability, root cause analysis, and preventive/predictive maintenance. Having reviewed the draft regulatory guide in detail and considering the industry and NRC activities in the area of maintenance, AP&L believes that the intent of the regulatory guide can be met by other means.

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AP&L provides the following responses to the specific questions posed by the NRC:

Question 1

What level of detail should be included in the regulatory guide?

Response

In general the content of the draft regulatory guide is written at an appropriate level of detail. This allows the flexibility for the utility to have procedures to define its specific maintenance program. Some improvements, however, are recommended. The addition of examples and/or additional information to describe the intent would ensure consistency of interpretation. In previous regulatory guides the technique of providing questions with their responses as part of the regulatory guide helped to ensure a consistent interpretation. Further, the use of vague terms such as "effective" has the potential for subjective interpretation. Defining or eliminating such terms would be appropriate. Another alternative would be qualifying the terms with "as determined by utility management assessment." This would indicate that the element is to be interpreted by the individual utility.

Question 2

Is the scope of systems, structures, and components covered by the regulatory guide appropriate?

Response

The scope of including all systems, structures, and components, as reflected in the policy statement, is too broad. Use of the methodology being developed by the utility industry for the selection of equipment as a result of appropriate technical assessment is more appropriate. This would allow each utility to base its selection of equipment on plant specific experience and revisions to the list would be accomplished in a timely manner. Use of this methodology would further minimize interpretational differences between the NRC and the utility. Currently AP&L maintains equipment appropriate to the equipment's importance to safety and the individual components' design. The intent is to converge both the regulatory and industry emphasis on a specific set of important equipment.

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### Question 3

What criteria could be used to determine that a maintenance program is fully effective and additional improvement is not essential from a safety standpoint?

### Response

Multiple measures are needed to determine the effectiveness of maintenance performance. The regulatory processes and industry programs and controls, in the aggregate, when appropriately implemented, monitored, and adjusted on an on-going basis ensure safety. Long-term experience with the NRC and INPO evaluation processes indicates areas of needed improvement are identified and resolved. Similarly, overall performance indicators presently in use by the NRC and industry facilitate short-term and long-term identification of adverse trends.

### Question 4

Is it appropriate to use quantitative goals, which are described in Regulatory Position 3 of the draft regulatory guide, directed toward achieving a satisfactory level of performance in plant maintenance programs consistent with the level achieved by the top performing U.S. plants of similar design?

### Response

From a regulatory perspective, it is not appropriate to use quantitative goals to achieve a satisfactory level of performance in plant maintenance. Use of goals and objectives established by the utility to address specific performance problems is appropriate. Use of this management tool would ensure that the plant operates in a safe and reliable manner. Distorting the focus of maintenance activities to meet specific regulatory guides could lead to incorrect decisions resulting in reduced availability and operating less safely than could be otherwise achieved. Striving for safe and reliable plant operation should be the basis for maintenance activities. Comparison of equipment failures with the plant specific and industry experience would achieve a more realistic approach to maintenance activities. It is also appropriate for the utility to compare its performance with plants of similar design to provide areas for focus of maintenance activities. However, plant specific elements should provide precedence for focus of emphasis.

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Question 5

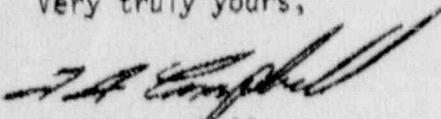
What quantitative measures would be appropriate for such goals? Should they be at the plant level, system level, component level, or some combination thereof?

Response

The INPU performance indicator program establishes overall performance indicators and goals. AP&L currently monitors msinyrnshvr performance at a plant level as part of its goals and objectives program and feels this level of performance monitoring is appropriate. Determination of appropriate performance monitoring for the achievement of long-term and short-term objectives, consistent with the individual improvement needed, should be plant specific and determined by the utility.

AP&L appreciates the opportunity to provide comments on this draft regulatory guide. We consider a well planned maintenance program to be of utmost importance in the safe and reliable operation of Arkansas Nuclear One and will continue to work with utility groups and the NRC to achieve this goal.

Very truly yours,



T. G. Campbell

TGC/lw