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Washington, D C. 20555

Subject: Entergy Operations Comment on Draft Regulatory Guide DG-1020,
"Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"

Reference: 57 Federal Register 55286, dated November 24, 1992

CNRO-92/00005

Gentlemen:

The referenced Federal Register requested comments on the subject draft regulatory guide. Entergy Operations, Inc., the licensee for Arkansas Nuclear One, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station has reviewed the guidance and offers the following comments for your consideration.

Entergy Operations does not endorse changing the maintenance rule to incorporate requirements of the license renewal rule. However, we strongly believe the license renewal rule should be reconsidered in light of the inherent benefits derived by maintenance rule programs. With the set of components monitored for age related degradation can be significantly reduced by plant level and system level performance monitoring via the maintenance rule. The scope of the license renewal rule should only address those aspects of plant aging that are not addressed by effective maintenance programs.

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Additional comments as well as responses to the four questions are provided in the attachment. In addition to the comments provided herein, Entergy Operations participated extensively in the Verification & Validation Program (V&V) and provided input to the comments being forwarded by NUMARC. As such, we endorse NUMARC's comments submitted on behalf of the nuclear power industry on this draft guidance. It should also be noted that additional changes may be needed to the guideline after the V&V report has been finalized.

If you have any questions, please contact Kenneth Hughey at (601) 984-9758. Thank you.

Sincerely,



For J. R. McGaha

JRM/jkw
attachment
cc:

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Comments on Maintenance Draft Regulatory Guide

There are several comments we made in our final input to the V&V report that are repeated for emphasis:

- 1) The NUMARC 93-01 guidance places too much emphasis on specifically identifying the scope of SSCs subject to the requirements of the rule. This emphasis could result in unwarranted and unproductive regulatory effort in scrutinizing which SSCs are in the scope of the rule. The primary objective should be to identify the important performance criteria and then to match equipment to that criteria.
- 2) The guidance places too much emphasis on using the PRA. The rule can be adequately addressed with no reliance on the PRA. More direction should be provided on alternate means of satisfying the requirements.
- 3) The guidance states that risk significant and standby systems will have specific performance criteria and implies that this will be at the system level. It may well be that the most appropriate performance criteria for some of these systems would be at the plant level.

Additional comments on NUMARC 93-01 beyond those discussed in the V&V report are:

- 1) Section 8.2.1.6 addresses SSCs that are not within the scope of the rule. This section is irrelevant and should be deleted.
- 2) As mentioned above, the method for determining risk significance using the PRA should be modified to place more emphasis on expert opinion.
- 3) Section 11 addresses the removal of equipment from service for maintenance. This section appears overly prescriptive. Section 11.2 provides guidance for the development of an approach. Section 11.2 should be revised to make it clear that this is not the only method that licensees may use. It should state that licensees may use other approaches, provided they satisfy the intent of 10CFR50.65(a)(3).

Response to NRC questions on Maintenance Rule on December 18, 1992

Question #1:

The license renewal rule, 10CFR54, contains requirements that are related to the maintenance rule. Is it possible to apply NUMARC 93-01 as written, or to modify the guidance, in order to not only satisfy the maintenance rule but also to address the requirements of the license renewal rule?

Response:

It is not possible to apply NUMARC 93-01 as written to address the requirements of the license renewal rule. However, we do feel it is important to coordinate the two efforts. We do not believe the NUMARC 93-01 guidance should be modified because of the considerations listed below. We strongly recommend that 10CFR54 be modified to facilitate a coordinated maintenance rule and license renewal effort. The license renewal rule scope should only address those aspects of plant aging that are not addressed by effective maintenance programs. Modification of 93-01 should not be made given these following considerations:

- Adding license renewal implementation requirements would require a rewrite to the maintenance rule guideline (93-01). This would delay publication of a finished product to the nuclear industry for each plant's rule implementation.
- Putting the maintenance rule and licensing renewal into the same guideline would make monitoring and goal setting prescriptive as 10CFR54 is currently written. To meet the requirements of 10CFR54, the performance monitoring would be at the component level. The establishment of the NUMARC guidance and the spirit of 10CFR50.65 is that monitoring could be performed on the plant, system, or train level. Component level performance monitoring would require significantly more manpower and resources to implement.
- Some plants are not presently (or in the future) pursuing license renewal. Adding license renewal to the maintenance rule guidance would be burdensome and unnecessary for these plants.

Question #2:

In 10CFR50.65 (a)(1), the maintenance rule calls for monitoring performance or condition of structures, systems, and components against licensee - established goals, and 10CFR50.65 (a)(2) states that such monitoring is not required if the performance or condition of structures, systems, and components is effectively controlled through the performance of appropriate preventive maintenance such that the structure, system, or components remains capable of performing its intended function. The guidance being provided emphasizes the establishment of performance criteria to demonstrate that structures, systems, and components are effectively controlled through preventive maintenance. Is the guidance sufficiently clear that an affirmative demonstration is necessary that the established performance criteria have been met if a structure, system, or component is to be considered to be controlled under 10CFR50.65 (a)(2)? If not, how could the clarity and consistency of the guidance be improved?

Response:

We feel that the guidance, as it is written, is clear. Our interpretation is that an affirmative demonstration is necessary, and is clearly identified in the maintenance rule guideline. The guideline supports the language used in 10CFR50.65.

Questions #3

Both the statement of considerations for the maintenance rule (56FR31308, July 10, 1991) and NUMARC 93-01 refer to the concept of inherently reliability. Is this concept sufficiently clear, given the examples and discussion to describe the concept in NUMARC 93-01, or are there improvements that would help to better define this concept?

Response:

The concept of inherently reliable was understood by the V&V group and interpretation was similar. The NUMARC guidance document defines inherently reliable as having high reliability without having preventive maintenance.

Examples of inherently reliable would be:

- Buildings
- Cable Trays
- Raceways
- Cable/Wiring
- Piping

Question #4

NUMARC 93-01 outlines methods based on probabilistic risk assessment (PRA) to determine risk significance of structures, systems, and components. Is this guidance clear and does it satisfactorily address low frequency, high - consequence contributors (e.g., intersystem loss-of-coolant accidents and boiling water reactor anticipated transients without scram events), or are there improvements that would add to the clarity and completeness of this guidance?

Response:

The guidance is sufficiently clear. The criteria prescribed in the NUMARC guideline yields specific results for each plant. However, using the same criteria, the results may differ from plant to plant based on the varying risk significance of systems at different plants. NUMARC 93-01 should be revised to place less emphasis on the direct use of the PRA and more emphasis on expert opinion as a result of the V&V. Plants should have the flexibility to utilize and rely on the existing plant experience gained through operation of the plant and completion of the V&V effort in making final determinations of a system's risk significance. While insights for the plant's PRA are valuable and should be factored into the final decision, the plant experience and knowledge of plant operations can not and should not be ignored. For example, a list of systems (which could be derived from PRA) should be used as input to an Expert panel. Decisions from this Expert panel could be the final filter for determining systems that are risk significant.