



OFFICE OF THE COMMISSIONER

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

REQUEST REPLY BY 6-15-88

COMKC-88-3

June 9, 1988

cys: Beckjord Ross Speis Morris King

Stille Layton Ribon Hurley Beckjord Jordan EDC R/T

MEMORANDUM FOR: Chairman Zech Commissioner Roberts Commissioner Rogers

sf 6/22

FROM: Kenneth M. Carr

SUBJECT: OPTIONS FOR RULEMAKING TO BE PROVIDED AT NRC MAINTENANCE WORKSHOP, JULY 11-13, 1988

As you are aware, the NRC has planned a workshop on July 11-13, 1988, to solicit information and comment from the public and regulated industry to assist in formulation of the proposed maintenance rule. In order to make this workshop as efficient and productive as possible considering the ambitious schedule of the rulemaking, serious consideration should be given to the proposed options provided at the outset of the workshop. If too many options are provided (about five are currently being considered), it will probably be difficult to arrive at any kind of a consensus considering the diversity of those expected to attend and the relatively brief duration of the workshop.

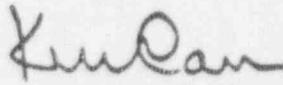
At present, there does not appear to be a clear consensus at the staff level as to what the "preferred option" for rulemaking should be. However, there does appear to be some support for a rule, limited in scope, which would require that licensees track certain defined maintenance performance indicators (PIs) which would measure the effectiveness of a broad range of maintenance activities. The number of the PIs should be limited, with about ten appearing to be sufficient to provide the desired assessment of the licensee's program. To the maximum extent possible, the selected PIs should attempt to incorporate evaluation of all those activities already discussed in the policy statement. It is obvious that the evaluation of the effectiveness of some activities will have to be combined in order to keep the PIs to a manageable number.

If this approach were to be adopted, the challenge is then twofold: selection of the PIs, and defining how the PIs are to be uniformly measured. If the workshop activities were focused along these lines, it is apparent that in three days meaningful results could probably be achieved. I firmly believe that in order for the workshop to have a maximum chance of success, the "preferred option" should be defined at the outset. Five options are just too many to focus the discussion to achieve meaningful results.

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Therefore, I propose that the staff submit to the Commission a "straw man" for consideration which would present the above approach as the "preferred option" at the workshop. Other possible options could be proposed, but they would be listed as other approaches warranting consideration. Due to the relatively brief time before the workshop, I would appreciate hearing your thoughts on this issue by June 15, 1988. If there is consensus on this recommended approach, I would then direct SECY to develop an SRM directing staff to develop a "straw man" in short order for review by the Commission prior to the workshop.

SECY, please track.



Kenneth M. Carr
Commissioner

cc: EDO
OGC
GPA
SECY