

Southern Nuclear Operating Company
Post Office Box 1295
Birmingham, Alabama 35201
Telephone (205) 868-5131



Southern Nuclear Operating Company
the southern electric system

Dave Morey
Vice President
Farley Project

April 13, 1994

Docket Nos. 50-348
50-364

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington D.C. 20555

ATTENTION: Mr. Thomas Foley
M/S 10-A-19

Comments on NRC draft Inspection Procedure
"Maintenance Inspection Procedure XXXXX"

Dear Mr. Foley:

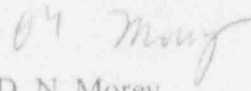
Southern Nuclear Operating Company has reviewed the NRC draft Inspection Procedure "Maintenance Inspection Procedure XXXXX," made publicly available by the Federal Register notice on February 4, 1994. In accordance with the request for comments, Southern Nuclear is in total agreement with the NEI comments that are to be provided to the NRC. At the request of NRC staff present at the recent NRC Public Workshop concerning the new draft NRC Maintenance Inspection Procedure, Southern Nuclear has also attached additional comments. Also announced at that workshop was the fact that the NRC would be conducting eight pilot non-enforceable inspections of utility implementation of the Maintenance Rule throughout the country. Performance monitoring programs to meet Maintenance Rule requirements should be in place by August 1, 1994. Therefore, Southern Nuclear requests that Plant Farley be considered for one of the pilot inspections.

9404210205 940413
PDR ADDCK 05000348
PDR

Aool
1/1

Should you have any questions, please advise.

Respectfully submitted,



D. N. Morey
Southern Nuclear Operating Company

DNM/JMG

Attachment

cc: Southern Nuclear Operating Company
Mr. R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. B. L. Siegel, Licensing Project Manager

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. T. M. Ross, Senior Resident Inspector

Comments on
NRC Maintenance Inspection Procedure

General Comments

The general approach of the draft Inspection Procedure does not take advantage of the performance based nature of the Maintenance Rule. The Procedure is written to be more prescriptive than performance based. In general, the Procedure should be re-written to recognize that most utilities will: (1) utilize NUMARC 93-01 recommended performance criteria prior to the need for goals; and (2) control SSCs under paragraph (a)(2) and move them to paragraph (a)(1) based on performance. The inspector should be guided to review the output of the licensee's implementation, e.g., performance of risk significant SSCs against performance criteria and the establishment of goals where required as a basis for performing additional activities.

Several sections of the Inspection Procedure refer to the use of industry wide operating experience used in implementing the maintenance rule. Industry wide operating experience programs are on going programs where action is taken as individual events or trends are identified to the utilities. The Inspection Procedure should be revised to reference existing NRC Inspection procedures for evaluating industry operating experience programs instead of providing new guidance.

"Piggy backing" emergency diesel generator commitments that licensees made as a result of 10CFR50.63 "Loss of All Alternating Current Power" into the Inspection Procedure is confusing and unnecessary. If a plant has established an effective maintenance program for the whole plant, which includes diesel generators, it should not be necessary for the NRC to specify additionally that we must have an effective maintenance program for diesel generators. In addition many plants made commitments to 10CFR50.63 that go beyond effective maintenance yet this inspection procedure does not seem to recognize that fact.

Specific Comments

Page 1, Lines 17-20

Delete, see general comment above.

Page 1, Lines 35-39

Delete "and review equipment history records and other available documentation." This review is not consistent with "Maintenance Effectiveness." The inspector should determine if the licensee's maintenance program is effective through determination of whether or not performance criteria are being met as opposed to the subjective methods described in this paragraph. The inspector should review and concur with the reasonableness of the site's performance criteria. Reliance on equipment history records or other available documentation takes emphasis away from the Rule's performance based nature. Additionally the statements "...condition of plant SSCs." on line 36 and "...condition of SSCs." on line 38 should refer specifically to SSCs within the scope of the Maintenance Rule.

Page 1, Footnote 1, Lines 46-50

Footnote 1, states that not all items listed in this section are necessarily regulatory requirements unless explicitly stated. Since non-regulatory requirements are out of scope, all non-regulatory requirements should be deleted.

Page 1 Lines 45-Page 2 line 13

The draft Inspection Procedure appears to assume that there will be a permanent population of SSCs that are controlled in accordance with Rule paragraph (a)(1). Implementation of NUMARC 93-01 will result in all SSCs being evaluated to (a)(2) criteria for determination of the need for goals and goal monitoring. The potential for there being no SSCs in (a)(1) needs to be addressed in this section.

Page 2, Line 51 - Page 3, Line 3

Delete per first comment (Ref.: Comment on Page 1, Lines 17-20).

Page 3, Line 36

Similar NSSS review statement should be deleted since Maintenance Rule has gone beyond NSSS part of the plant.

Comments on
NRC Maintenance Inspection Procedure
Page 3

Page 3, Line 37

Add the following sentence:

"This can be accomplished by the license's existing operating experience program."

Page 3, Lines 45-46

The Maintenance Rule is very unclear and required a large NUMARC document for interpretation. This sentence could give inspectors open license to employ their own interpretations of the 'clarity' of these requirements.

Page 4, Lines 36-46

Reference to the visual inspection as a measure of maintenance effectiveness deviates from the performance based methodology proposed by the Maintenance Rule for establishing maintenance effectiveness, does not restrict the inspector to in-scope SSCs, and brings the determination of maintenance effectiveness to the component level rather than the SSC level. This section should be removed from the draft Inspection Procedure.

Page 5 Line 2

Changing "...monitor the performance or condition for all SSCs..." to "...monitor the performance or condition for those SSCs..." would eliminate confusion.

Page 5 Lines 18-20

Reference to preventive maintenance program results is taken out of context from NUMARC 93-01 and should be deleted.

Page 5, Lines 26-32

Depending upon which method was used, the inspector may or may not be able to use the licensee's own criteria to determine if the licensee has identified those SSCs that are risk significant. The inspector should evaluate the methodology used, review the resultant risk significant SSCs, and verify that the methodology was properly implemented. For our plants risk significance determination was done with PRA computer models and expert panel review. We are concerned that the inspector will not have the tools to independently verify a sample of this review.

Page 5, Lines 34-54

Needs clarification. We do not intend to have a graduated risk significant scale. Either it is risk significant or it is not risk significant, per NUMARC 93-01.

Page 6, Line 23

Revise the sentence that starts on line 23 as follows: "These goals will generally be at the function level and may be performance..."

Page 7, Lines 9-11

Delete. This statement is prescriptive, whereas, the Maintenance Rule is supposed to be performance based. Credit should be given for licensees existing OEP and existing NRC inspection procedures. In general the wording should be changed to be more consistent with section 9.4 of NUMARC 93-01.

Page 7, Line 15-17

A better definition is needed concerning what a "clearly declining trend" means. Change "...or where a clearly declining trend in SSC performance or condition indicates the goals would not be met before the end of the next surveillance cycle." to "...or where unacceptable SSC performance continues."

Page 7, Lines 27-28

Delete. This is prescriptive, not performance based. 10CFR65 does not require documentation of RCCA. Other programs do but those are addressed in other NRC inspection guidance.

Page 8, Lines 10-17

The definition of MPFF and repetitive MPFF is highly subjective. This section of the draft Inspection Procedure should require the inspector to evaluate the licensee's methodology for making MPFF and repetitive MPFF determinations. This section should reference the Rule, Regulatory Guide, NUMARC 93-01 and NUMARC Workshop questions and answers when performing this evaluation.

Page 8 Lines 19-27

The wording related to repetitive MPFFs is not consistent within this section. Lines 19 to 27 should be deleted, leaving the remainder of the section to reference NUMARC 93-01 section 9.4.4.

Page 8, Lines 35-36; Page 9, Line 10; Page 10 Line 42

Delete the references regarding a second MPFF. This is not a rule requirement and may be inconsistent with meeting performance criteria.

Page 8, Lines 35-36

This section should be revised to indicate that SSCs are not automatically placed under the control of paragraph(a)(1). The movement from paragraph (a)(2) to (a)(1) is based on an evaluation of the MPFFs, their cause and corrective action.

Page 9, Line 10

The term maintenance preventable failure used in this line and others should be changed to maintenance preventable **functional** failure to be consistent with Regulatory Guide 1.160 and NUMARC 93-01.

Page 9, Line 37-38

This section provides guidance for the inspector to evaluate a sample of SSCs that have been determined by the licensee to be inherently reliable by reviewing the associated documentation. This section should be revised to guide the inspector to review the licensee implementation methodology to provide the justification and basis for any exclusion decisions.

Page 9, Line 45

Clarify "Low Risk Significant."

Page 10, Line 1

Does this paragraph mean the Licensee should have a predetermined list of low risk significant SSCs from which the inspector can choose a sample or is a criteria sufficient?

Page 10 Line 10

This section should be revised to account for multi unit sites that might want to do the evaluation for both units at the same time within the 24 month cycle but not necessarily immediately following a refueling cycle.

Page 10 Lines 31-43

This section should be revised to state that if unavailability is the performance criterion and performance is judged to be acceptable, then the system/train can remain in paragraph (a)(2).

Comments on
NRC Maintenance Inspection Procedure
Page 7

Page 11, Line 9

Delete this sentence. (Ref. Comment on Page 7, Lines 9-11)

Page 11, Lines 15-18

Delete this sentence. As it is written, the licensee would be required to prove that the Maintenance Rule has forced us to get better and to document this proof.

Page 11, Lines 20-52

This section of the draft Inspection Procedure requires a prescriptive evaluation of the licensee's work control scheduling process as it relates to consideration of risk to core damage. This section includes prescriptive requirements that are not included in the Rule, Regulatory Guide or NUMARC 93-01, e.g., maintenance of a single list of SSCs and identification as to whether the SSCs are in or out of service. This section should be rewritten to: (1) delete the prescriptive nature of the inspection, (2) make it applicable to only SSCs that are risk significant and (3) not require a separate list of SSCs. Guidance should be provided to the inspector to evaluate the methodology developed by the licensee for consideration of risk and the implementation of that methodology. Review of the adequacy of the evaluation should be based on the licensee's methodology.

Page 11, Lines 40-41

Delete statement to keep all maintenance rule documents in one location. This would hinder our operation and would only serve to make auditing easier.

Page 11, Line 47

Rule does not require a "documented" process.

Page 11, Line 50

Rule does not require us to "maintain a list" as stated.

Page 12, Lines 22-26

Delete this example since it prejudices that all of these non-safety systems will be in the scope of the rule.

Page 14 Line 1

This section should be revised to be consistent with NUMARC 93-01; indicating that only those non-safety -related SSCs whose failure has caused a reactor scram or safety system actuation should be included in the scope of the Rule. This section currently requires SSCs that could cause a scram to be included.

Page 14, Lines 18-21

Should add some comment to recognize that design changes that have eliminated trip hazards can be credited in the maintenance program.

Page 14, Lines 30-32

This section provides guidance related to the exclusion of SSCs from the scope of the Rule based on their already having programs requiring control of their maintenance. This section should reference NUMARC 93-01, instead of providing additional guidance, which is not as clear as that in NUMARC 93-01.

Page 17, Lines 4-6

NUMARC 93-01 states that a goal could be the same as the performance criteria. This section of the draft Inspection Procedures indicates that the goal should be more aggressive than the performance criteria. This section should be revised to indicate that goals should be established based on performance and corrective action defined by the licensee.