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April 14, 1994

Docket Nos. 50-213
50-245
50-336
50-423
B14819

Re:10CFR50.65

U. S. Nuclear Regulatory Commission
Attention: Mr. Thomas Foley
Suite 300
10-A-19, OWFN
Washington, DC 20555

Dear Mr. Foley:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Comments on Draft NRC Maintenance Inspection Procedure

The purpose of this letter is to provide the NRC with comments from Connecticut Yankee Atomic Power Company (CYAPCO) and Northeast Nuclear Energy Company (NNECO) on the NRC Draft Maintenance Inspection Procedure XXXX. Comments were requested by the NRC Staff at the March 31, 1994, NRC Workshop on this draft procedure.

On behalf of the Haddam Neck Plant and Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, CYAPCO and NNECO hereby provide, as Attachment 1, comments on the draft inspection procedure.

We appreciate the opportunity to participate in the comment process. Should you have any questions regarding this matter, please do not hesitate to contact Mr. Gerard van Noordennen at (203) 665-3288.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

FOR: J. F. Opeka
Executive Vice President

BY: E. A. DeBarba
Vice President

cc: See Page 2

A001
1/1

cc: T. T. Martin, Region I Administrator
A. B. Wang, NRC Project Manager, Haddam Neck Plant
J. W. Andersen, NRC Acting Project Manager, Millstone Unit No. 1
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant
P. D. Swetland, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

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Attachment 1

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Comments on Draft NRC Maintenance Inspection Procedure

April 1994

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Comments on Draft NRC Maintenance Inspection Procedure

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1 35-39	In the absence of definitive acceptance criteria, the guidance to determine if the licensee has an effective maintenance program is subjective. How will the inspector determine if the licensee's program is effective? Additionally, what is the inspection frequency of this procedure?
2 9, 10	This section discusses the need for licensees to take into account industry-wide operating experience during the establishment of goals. Is it the NRC expectation that licensees develop additional programs to accomplish this or are existing licensee programs adequate?
2 32-36	This section requires licensees to take into account, where practical, industry-wide operating experience during the periodic evaluations/assessments. What is the NRC expectation for licensee usage of industry operating experience?
3 35-37	This section requires the inspector to verify that licensees evaluate maintenance and equipment problems at plants with similar NSSS designs to identify possible generic problems. Is this evaluation above and beyond those problems reported through normal industry-wide operating experience?
5 26-32	This section states that licensees must have clear criteria for selection of risk significant systems which can be utilized by the inspector in reviewing this determination. This does not allow for the use of a "Functional Review" as outlined in NUMARC 93-01.(1)

(1) Nuclear Management and Resource Council, NUMARC 93-01,"Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," dated May 1993.

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5 34-57	The terms "less-risk-significant" and "more-risk-significant" are not addressed in either 10 CFR 50.65 or NUMARC 93-01. These terms must be clearly defined to avoid subjective interpretations by different inspectors. The inspection procedure requires some parameter trending for critical components. This is inconsistent with NUMARC 93-01. The planned monitoring for all risk significant systems is system/train availability and reliability.
7 5-12	This section states, "The inspector should verify that the plant established and implemented a documented method or process for considering industry operating experience, where practical, when establishing goals." What is the NRC expectation for plant processes to use industry operating experience when establishing goals?
7 21-28	This section requires licensees to document root cause analyses and corrective actions when either goals are not met or for a clearly declining trend. Does this connote a "formal" root cause analysis must be conducted?
7 22, 23	The term "clearly declining trends" is not addressed in NUMARC 93-01, as requiring goal setting. Goal setting is only required if the Performance Criteria is not satisfied, or if Maintenance Preventable Functional Failures (MPFFs) have occurred, or repetitive failures have occurred.
8 1, 2	This section appears to impose a requirement that would require additional resources to justify the method for monitoring non-risk-significant systems, structures, and

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		components (SSCs) that are in a standby mode. While the approach to non-risk-significant SSCs that are in a standby mode is consistent with NUMARC 93-01, it should be noted that nothing in the inspection procedure specifically requires systems/train level performance monitoring criteria for standby systems.
8	20-23	This section states in part, "where one or more maintenance preventable failures (or MPFFs) occur on SSCs..." For consistency with NUMARC 93-01, this sentence should be changed to: "when one or more **repetitive** maintenance preventable **functional** failures (MPFFs) occur..."
9	45	What is the definition of "Low Risk Significance"? Does this mean "non-risk-significant" as defined in NUMARC 93-01? If the answer is yes, then the terms should be consistent.
10	31-33	This section discusses the potential need to adjust preventive maintenance (PM) activities where the SSC availability is "judged to be unacceptable". There should not be a requirement to adjust PM activities if the established performance goals are being met. In addition, the term "judged unacceptable" should be defined to eliminate subjective interpretations.
10	36, 37	The statement "...other remedial action, such as modification or replacement" is indeed within the scope of Goal Setting which is considered as a corrective action plan within NUMARC 93-01. Therefore, this sentence should simply state, "subject to the requirements of paragraph (a)(1)."

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10 45-55	The industry-wide operating experience program is an ongoing requirement where action is taken, as appropriate, as individual events and/or trends are identified to other licensees. Why is this program included as part of the periodic assessment?
11 36-52	This section discusses the need to keep track of the status (in or out of service) of plant equipment and that the status should be kept in one location. In addition, this section states that the inspector should verify the adequacy of the evaluations made by the licensee before taking the SSCs out of service. What are the expectations of the NRC since these requirements are not specified in NUMARC 93-01?
13 6-11	The requirement to document the specific reason why a non-safety related SSC contained within the Emergency Operating Procedures was classified as "out-of-scope" is new and is clearly inconsistent with NUMARC 93-01.
14 30-32	The basis statement would indicate that all SSCs with existing maintenance requirements can be excluded. The items can be excluded because they do not meet the minimum threshold and are being maintained effectively. The "maintain effectively" may be truly pushing the envelope on some SSCs.
15-17	There are surprisingly numerous details relative to the emergency diesel generators (EDG). Does this imply that pilot inspection licensees must have the EDG Maintenance Rule requirements implemented prior to the inspection? Is there a specific date, other than the Maintenance Rule compliance date (July 10, 1996) that the EDGs must be

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		complete for Station Blackout Rule compliance?
17	3-7	This section implies that whatever number of hours of unavailability the licensee establishes as acceptable (regardless of the value), can be second guessed by the inspector without basis.