



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

FEB 27 1991

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MEMORANDUM FOR: Commissioner Curtiss

FROM: James M. Taylor
Executive Director for Operations

SUBJECT: RESPONSE TO QUESTIONS REGARDING MAJOR REVISION OF MAINTENANCE
INSPECTIONS (CR-91-014)

In your memorandum of February 13, 1991, you asked me to address three questions regarding the staff's intention to revise and expand the focus of maintenance inspections. Your questions and the staff's responses to them are presented below. Please note that any maintenance-related changes to the current inspection program will be held in abeyance pending the Commission's decision on maintenance rulemaking.

Question 1:

What specific changes does the staff intend to make in the focus of our current maintenance inspections?

Response:

The staff will revise the NRC's routine monthly maintenance inspection procedure to incorporate elements of the Maintenance Team Inspection approach. This inspection procedure will continue to emphasize the observation of work activities but will integrate these observations into assessments of the effectiveness of various aspects of a licensee's maintenance program. The revised procedure will ensure that the staff regularly performs a comprehensive evaluation over time of a licensee's maintenance program and will provide an improved basis for the periodic SALP assessment of the maintenance area. Similarly, the staff will incorporate as appropriate, elements of the Maintenance Team Inspection guidance into the operating reactor inspection program for use as special inspection at facilities where there is a perceived maintenance problem.

Question 2:

What will the resource impact be of the proposed changes, both for the NRC and for licensees?

Response:

The resource impact, both for the NRC and for licensees, of the proposed changes to the inspection program will depend on the version of the maintenance rule, if any, that is adopted by the Commission. The staff believes that for no rule or for a process-oriented rule minimal changes to the maintenance

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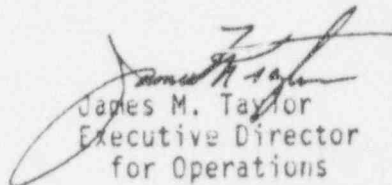
programs of most licensees would be required. Therefore, little change in the amount of inspection effort would be required to confirm the adequate implementation of these changes. If the Commission adopts a reliability-based rule, such an action might require significant program changes for licensees and require a proportionate increase in inspection effort by the NRC.

Question 3:

If the Commission adopts a results-oriented, reliability-based approach to maintenance, such an approach would appear to dictate a different approach to maintenance inspections. In view of this, and in light of the fact that a decision has not yet been reached by the Commission on the overall approach to maintenance, would it be the staff's intention to withhold any modifications to the current inspection procedure until a decision is rendered by the Commission?

Response:

The staff is working on modifications to the inspection program to incorporate the appropriate Maintenance Team Inspection elements. However, we are holding any changes to the current inspection program in abeyance pending the Commission's decision on the maintenance rulemaking.


James M. Taylor
Executive Director
for Operations

cc: Chairman Carr
Commissioner Rogers
Commissioner Remick
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