



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

*File  
LC (ind. 4m)  
3-248*

February 13, 1991

OFFICE OF THE  
COMMISSIONER

MEMORANDUM FOR: James M. Taylor  
Executive Director for Operations

FROM: James R. Curtiss *John R. Ulin*

SUBJECT: VOLUNTARY ENTRY INTO ACTION STATEMENTS FOR  
THE PURPOSE OF PERFORMING PREVENTIVE  
MAINTENANCE

On October 4, 1990, I raised a number of questions for your consideration on the increasingly-frequent practice of licensees entering into voluntary action statements for the purpose of performing preventive maintenance ("LCO maintenance"). Your response of November 2, 1990 addressed this issue in some detail, emphasizing the importance of a licensee evaluating whether such actions will result in a net safety benefit. You further indicated that draft guidelines to this effect would be prepared by the end of 1990, for incorporation into the NRC Inspection Manual. I also understand that INPO has been advised of our concern in this regard and will be considering this matter as well.

In my periodic visits to licensee sites, I continue to come across instances where licensees engage in this practice without first evaluating whether a particular action will result in a net safety benefit. Additionally, I continue to find that the views expressed by the agency on this matter appear to differ from region to region and from resident inspector to resident inspector.

In view of this, I would ask that you advise me of the status of NRC's effort to revise our Inspection Manual, as well as the status of any steps that INPO has undertaken. Additionally, I would be interested in your thoughts on how we can best communicate the agency's position on this matter to our staff in the regions and at the individual sites, so as to ensure a uniform approach to this matter.

cc: Chairman Carr  
Commissioner Rogers  
Commissioner Remick  
OGC  
SEC<sup>v</sup>

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*YK*

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