APR 17 1992

MEMORANDUM FOR: Gary G. Zech, Chief
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FROM: Richard P. Correia, NRC Coordinator for
NRC/NUMARC Maintenance Interactions
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Office of Nuclear Reactor Regulation

SUBJECT: TELEPHONE CONFERENCE SUMMARY: April 14, 1992
NRC/NUMARC TELEPHONE CONFERENCE CALL TO
DISCUSS THE NUMARC GUIDANCE DOCUMENT, DATED
MARCH 30, 1992, FOR THE IMPLEMENTATION OF THE
MAINTENANCE RULE (10 CFR 50.65)

The subject telephone conference call was made in order for the NRC staff to provide preliminary comments to the NUMARC representatives on the guidance document prepared by NUMARC. Those persons who participated in the conference call are listed in enclosure 1.

The NRC staff presented some general observations which were discussed at length with NUMARC. These observations, and NUMARCs response, are summarized below:

1. The general tone set by the NUMARC document was too negative. It appeared to the NRC staff that the document attempted to minimize the impact of the rule where ever possible. NUMARCs use of "directly" and "principal" to minimize the scope of the rule is one example of this. They propose that only non-safety related SSCs which "directly" prevent a safety related SSC from functioning, or whose failure "directly" causes a scram, are included in the scope of the rule. They have also stated that only those non-safety related SSCs used in emergency operating procedures that are the "principal" means of controlling plant functions are included. Neither "directly" nor "principal" are adequately defined. Other examples were also discussed. The staff attempted to convey the message that the industry is expected to take a more positive, proactive approach to the implementation of the maintenance rule.

NUMARC responded that there was no intent to avoid or evade the rule, but rather to better define its scope. They believe that without additional clarification it will be difficult for the

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utilities to know which SSCs should be included in the scope of the rule. They fear that in order for their member utilities to be absolutely sure of meeting the intent of the rule (as presently written) they would be forced to include almost every SSC in the plant. They stated their belief that the guidance document was the appropriate place to refine the definition of the scope of the rule. The NRC staff and NUMARC need to discuss this issue further.

2. In paragraph 9.3 NUMARC states that in order to be covered under section a(1) of the maintenance rule an SSC must be risk significant and must have not demonstrated an acceptable level of performance. The staff disagreed with this approach because it presumes that most SSCs will be under section a(2) of the rule and that they will only be placed under a(1) of the rule if they are proved to be unreliable and are risk significant. The staff believes that these criteria are non-conservative and would have the effect of keeping most SSCs under section a(2) of the rule. The staff proposed that all SSCs be placed initially be under section a(1) of the rule and then moved to a(2) only if the SSC has low risk significance and proves to be highly reliable.

After much discussion the staff and NUMARC agreed that initially placing all SSCs in a(1) vice a(2) would not matter in the long run if the criteria for transferring SSCs from a(1) to a(2) and from a(2) to a(1) were adequate. Either way the appropriate SSCs would end up in the correct category after several review and evaluation cycles. However the staff emphasized that the criteria presently described in the guidance document are inadequate. NUMARC agreed to reconsider these criteria.

3. In paragraph 9.4.1.2 NUMARC states that due to plant specific redundancy and diversity, an SSC failure does not necessarily cause a loss of safety system function. They believe that it is appropriate to set system level goals which would assume that the failure of one train of a system with redundant trains would not be considered a system failure. The staff disagrees with this approach. The intent of the maintenance rule is to improve the reliability of plant equipment through a process of goal setting, monitoring and corrective actions. Setting goals at the system level rather that at the train level tends to obscure single train failures and may prevent adequate corrective action. It appears NUMARC has made the assumption that since the loss of one train of a redundant safety system does not necessarily violate technical specifications, it therefore follows that it should not be considered a failure of a safety system function for purposes of the maintenance rule. The intent of the rule was not to simply reiterate technical specification requirements but rather to improve SSC reliability and ensure that the minimum operability requirements contained in the technical specifications are not reached. If the goal is set at the system level no corrective actions will be required until there is a safety system failure, and that is not acceptable.

NUMARC stated that they do not agree with the staff on this issue. They believe that the establishment of goals at the system level is appropriate for systems with redundant trains.

4. In paragraph 12.0 NUMARC addresses the maintenance effectiveness assessments required by section a(3) of the rule. In paragraph 12.2.1 NUMARC specifically addresses the review of goals for SSCs in a(1). The lack of a similar paragraph to address the review of performance criteria for SSCs under a(2) implies that SSCs under a(2) need not be addressed during the annual assessment. The staff believes that NUMARC needs to clarify that the annual assessment required by section a(3) of the rule applies to SSCs under both a(1) and a(2) of the rule.

NUMARC agreed to clarify this paragraph.

5. The documentation requirements specified in paragraph 8.3 are too vague and the documentation requirements contained in paragraph 12.3 refer only to the a(3) annual review. NUMARC needs to clearly spell out the documentation required for all activities associated with the rule.

NUMARC agreed to clarify the documentation requirements.

Enclosure 2 is a summary of the five observations discussed above.

Following these discussions, the staff went through the document page by page and provided detailed comments to NUMARC. NUMARC agreed to consider these additional comments.

The next meeting between the Steering Groups is scheduled for April 22, 1992 at 1:00 pm.

Richard P. Correia, NRC Coordinator for
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Enclosures: As stated
Distribution: NRC telephone conference attendees

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Enclosure 1

NRC/NUMARC MAINTENANCE RULE GUIDANCE DOCUMENT
TELEPHONE CONFERENCE
April 14, 1992

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Enclosure 2

SUMMARY OF NRC COMMENTS ON NUMARC GUIDANCE DOCUMENT

1. The general tone set by the NUMARC document was too negative, appeared to minimize the impact of the rule where ever possible.

NUMARC responded that their intent was better define the scope of the rule. They are concerned they will be forced to include too many SSCs in their program just to be sure they don,t violate the rule.

2. In paragraph 9.3 NUMARC states that in order to be covered under section a(1) of the maintenance rule an SSC must be risk significant and must have not demonstrated an acceptable level of performance. The staff believes that these criteria are non-conservative and would have the effect of keeping most SSCs under section a(2) of the rule.

NUMARC agreed to reconsider these criteria.

3. NUMARC believes it is appropriate to set system level goals for safety systems with redundant trains because the loss of one train does not necessarily mean the loss of safety system function. The staff believes it is appropriate to set goals at the train level because the loss of a train does result in a reduction in safety margins.

NUMARC does not agree.

4. The NUMARC document needs to clarify that the annual assessment required by a(3) of the rule applies to SSCs under both a(1) and a(2) of the rule.

NUMARC agreed to clarify this issue.

5. NUMARC needs to clearly spell out the documentation required for all activities associated with the rule.

NUMARC agreed to clarify the documentation requirements.