



DOCKET NUMBER PR 50
PROPOSED RULE (53 FR 47822) 61

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Al Kaplan

VICE PRESIDENT
NUCLEAR GROUP

February 27, 1989
PY-CEI/NRR-0976 L

Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington D. C. 20555

Proposed Maintenance Rule
Request for Comments

Dear Mr. Chilk:

Comments on the subject proposed rule were requested by the NRC in the November 28, 1988 Federal Register (53FR47822).

Using NUREG 1212 as a gauge of conformance, which provided industry data for the proposed rule, Perry Nuclear Power Plant presently meets 80% to 90% of the criteria in such important areas as formal preventive maintenance (PM) programs with goals and objectives, effective operations and engineering interfaces, established tracking systems for maintenance history and backlog, computer data bases for spare parts control and maintenance planning, periodic monitoring of maintenance performance using INPO and other performance standards, and tools and equipment availability. For Perry, application of the NUREG 1212 criteria is a question of degree of conformance toward which the proposed rule offers very little guidance.

We strongly support the NUMARC position being submitted on this proposed rule. We would like to place particular emphasis on the following points which have been well communicated to the NRC during earlier meetings and dialog on the subject.

- (1) The rule is unnecessary. Commissioner Roberts speaks most eloquently to this point, "Most importantly... there has been no demonstration that this rule would improve implementation of existing programs. Neither have I been provided with compelling documentation on what the problem is and how, specifically, this rule will fix it." Industry initiatives coordinated by NUMARC and INPO have already shown progress in increasing the effectiveness of maintenance programs within the industry. Further, the Commission already has several rules and programs in place that can effectively correct poor maintenance practices at individual utilities without burdening the entire industry.

As discussed above, many of the program elements that a rule would ultimately require are already in place at Perry. In fact over 50% of all maintenance manhours in 1988 were devoted to preventive maintenance activities.

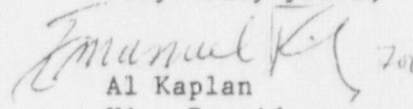
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- (2) The rule would probably do more harm than good. Applying this resource-intensive initiative to all plant equipment pulls in a direction opposing the recent IPE generic letter (88-20), which proposes to focus limited utility resources on those plant features most significant to safety. The IPE program, the cornerstone of severe accident resolution, has also been proposed as the vehicle for resolving other issues such as systems interaction. We cannot in the next breath impose equal safety importance on everything in the plant, and in a manner which demands considerable effort from so many parts of the plant organization.
- (3) This rule should be required to meet the standards of the Backfit Rule (10 CFR 50.109), since the rule proposes to modify and/or add procedures required to operate the plant. To argue that the proposed rule can be implemented under the "adequate protection" standard implies that nuclear plants do not presently assure it. The industry's safety record and continuing work at improvement refute that implication.

In conclusion, the foundation of good maintenance lies primarily in the skill, competence and thoroughness of the craftsperson, aided by supervisory involvement, good procedures, training, operating experience feedback and other factors which the rule addresses. As the rule digresses from demonstrated excellence to the numbing presumption that it can be administrated, the rule may in fact cause a decline in maintenance quality during the implementation phase as organizational focus is diverted toward compliance with an unnecessary and ineffective rule.

Very truly yours,


Al Kaplan
Vice President
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