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I strongly agree that effective maintenance at Nuclear Power Plants enhances safety and increases availability to the customers. I do not agree that a new Rulemaking to ensure the effectiveness of maintenance programs is necessary. The NRC is presently able to inspect the programs and enforce authority in this area.

It is my opinion that the data in NUREG 1212 is outdated. There is evidence that industry is taking maintenance very seriously and improving. They have recently undertaken initiatives to increase the overall average effectiveness of their maintenance programs. It will take a little more time to see how well these ideas will work, so in this sense a new Rulemaking would be premature. Most plants have very good programs while a few have inadequate ones, bringing down the average. Industry knows that their reputation is only as good as the worst performer. I feel the best way to bring these few up to par is for industry themselves, INPO and NUMARC, to criticize, pressure and help the bad performers. The industry has started to do this, but needs to do so more actively. It is possible that a Rulemaking would help these poor programs, but it is also very possible that it would adversely affect and hinder the better ones.

Maybe the best action the NRC can take is to publish in their new Regulatory Guide the ideas and attitudes from their study of maintenance programs in other countries (NUREG 1333) versus a prescriptive program description. They could take the ideas from the Proposed Rulemaking, i.e. factors that contribute to effective maintenance and the basis of a maintenance program, and put them in the Guide to direct industry. NRC could recommend that industry criticize itself more and pressure the poor performers. They could recommend that industry and manufacturers work more closely together, as other countries do, that there be more managerial involvement in day to day activities and that better training be used to alleviate human errors. One last main point that the NRC could suggest is that industry share its information and experience with foreign counterparts in order to help each other.

Sincerely,

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