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PROPOSED RULE

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NEW YORK STATE

ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N. Y. 14649-0001

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April 25, 1989

The Honorable Lando W. Zech, Jr.
Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

OFFICE OF THE
DOCKETING & COMPLIANCE
DIVISION

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BOARD

Dear Chairman Zech:

Rochester Gas and Electric Corporation has closely followed the NRC's Proposed Rule to Ensure the Effectiveness of Maintenance Programs. As we commented in our letter to the Secretary to the Commission, we have a number of current and planned initiatives to support our Ginna Nuclear Power Plant. The purpose of this letter is to briefly outline several of the more important initiatives.

We are currently reviewing the policies and programmatic aspects of the control of maintenance activities. Our purpose is to enhance and clarify the flow of work from the initial request to the final documentation, including for example, preplanning, control of materials, and post maintenance testing provisions.

We have recently strengthened the preplanning of all maintenance activities. The preplanning includes review of prerequisites, selection of materials, identification of all required permits, establishment of appropriate isolation boundaries, and identification of post-maintenance tests.

A program is in progress to upgrade all maintenance procedures. These upgrades are being performed consistent with current industry guidance as presented in INPO Reports INPO 85-026 Writing Guidelines for Maintenance, Test, and Calibration Procedures and INPO 85-038 Rev 1 Guidelines for the Conduct of Maintenance at Nuclear Power Stations. The upgrades will incorporate human factors considerations and enhancements in the level of technical detail contained within the procedures.

The maintenance organization has been realigned into two major areas, Maintenance and Maintenance Planning and Scheduling. This has facilitated greater management attention to the two major factors affecting maintenance: planning and scheduling, including the interaction with affected groups such as operations and the conduct of maintenance in the field.

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RG&E is participating in an EPRI Reliability Centered Maintenance Program. Over 20 key plant systems are being reviewed. Overall objectives of the program are to achieve cost-effective improvement in plant availability and safety. This will be accomplished through improved preventative and maintenance programs and reduction in component failures for critical components.

Plant equipment material condition inspection is being formalized to ensure continued high equipment availability.

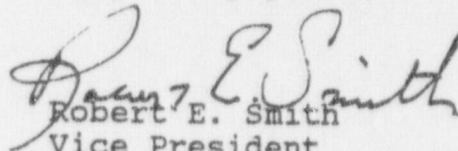
A formal Root Cause Analysis Program specifically directed to plant maintenance is planned.

Component and system improvements have been accomplished and will continue. These upgrades address primary systems, secondary systems and balance of plant systems.

We believe that these and other programs are effectively addressing our industry objective to maintain plant equipment at a level which ensures, with a high degree of reliability, that the equipment will perform its intended function when required. We continue to believe that the proposed rule is not an effective mechanism to enhance a maintenance program such as ours.

We urge you to consider allowing sufficient time to assess the impact of current maintenance upgrade efforts at Ginna as well as at other utilities, before making the final determination on the rule.

Very truly yours,



Robert E. Smith
Vice President
Production and Engineering

Copies: Commissioner Kenneth M. Carr
Commissioner James R. Curtiss
Commissioner Thomas M. Roberts
Commissioner Kenneth Rogers

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