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PROPOSED RULE  
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DOCKETED  
USNRC



**DUKE POWER**

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April 3, 1989

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Dear Chairman Zech:

I would like to strongly advise that the commission not adopt the rule published for comment on November 28, 1988 for Ensuring the Effectiveness of Maintenance Programs for Nuclear Power Plants. This rule is not needed for many reasons.

Adoption of the rule will disrupt industry initiatives already underway to improve maintenance programs. For example, at our three nuclear stations, significant personnel investment has been made to reorganize our maintenance engineering staffs. These new groups have been developed to strengthen our ability to perform predictive maintenance. Also, individuals in these groups are component experts, which amplifies our System Expert Program. Diagnostic testing has also been implemented at our stations, which goes beyond the typical preventive maintenance of changing oil, filters or belts on a predetermined frequency. These and other industry initiatives should be monitored and if sufficient progress is not made in a reasonable period of time, the proposed rule could be resurrected. If necessary, existing policy statements or INPO Guidelines in the maintenance area could be modified to achieve the desired results. If a few plants' maintenance programs are the cause for concern, increased attention both from the NRC and INPO is more appropriate than a rule that penalizes the entire industry. Finally, the adoption of this proposed rule, for which associated costs of implementation have been severely underestimated by the NRC staff, will not result in any measurable improvement in safety.

I agree with Commissioner Roberts and NUMARC that the proposed rule is unnecessary and will not improve the overall quality of our nuclear stations. This proposed rule, in fact, has the potential of disrupting improvement efforts already underway. Please consider these comments when deciding the outcome of this proposed rule.

Very truly yours,

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W. H. Owen

cc: Commissioner Roberts  
Commissioner Rogers  
V. Stello, Jr.

Commissioner Carr  
Commissioner Curtiss

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