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Date: Mon, Apr 23, 2001 6:09 PM
Subject: Guidance for Enforcing the Maintenance Rule

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Below is the result of your feedback form. It was submitted by
John Caves, Manager Regulatory Affairs (John.Caves@pgnmail.com) on Monday, April 23, 2001 at
18:09:07

Affiliation: Carolina Power & Light and Florida Power

Comments: Item 1 of Section 8.1.11.1, Sub-section II, Part A, titled "Issues that are violations of (a)(2)," states that a repetitive maintenance preventable functional failure (RMPFF) would indicate that the licensee has failed to demonstrate the effectiveness of preventive maintenance and consequently that SSC must be moved to (a)(1). The guidance should either clarify that the time frame for a repetitive failure is set by the licensee or the guidance should provide a time frame for repetitive.

Item 2 of Section 8.1.11.1, Sub-section II, Part A, titled "Issues that are violations of (a)(2)," states that a violation may exist if reliability and availability for SSCs is not met. Only HSS SSCs require both reliability and availability performance criteria. Therefore, the guidance must only apply to HSS SSCs. Please clarify that this item only applies to HSS SSCs.

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