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SUBJECT: Comment supporting in part,draft Reg Guide DG-1020,
 "Monitoring Effectiveness of Maint at NPPs."

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
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January 15, 1993

Regulatory Publications Branch
Division of Freedom of Information and
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Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Comments on Draft Regulatory Guide DG-1020, "Monitoring the
Effectiveness of Maintenance at Nuclear Power Plants,"
57 Fed. Reg. 55286 (November 24, 1992)
File: 93-057-026

The enclosure to this letter provides Arizona Public Service Company's comments on the draft Regulatory Guide DG-1020.

Should you have any questions regarding this information, please call Thomas R. Bradish at (602) 393-5421.

Sincerely,



WFC/TRB/JNI/jni

Enclosure

cc: J. B. Martin
J. A. Sloan
T. E. Tipton (NUMARC)

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PDR REGGD
XX. XXX C PDR

ENCLOSURE
COMMENTS ON DRAFT REGULATORY GUIDE DG-1020

ENCLOSURE

Arizona Public Service Company (APS) has reviewed the proposed Nuclear Management and Resources Council (NUMARC) comments regarding the four specific questions posed in the November 24, 1992, Federal Register notice (57 Fed. Reg. 55286) as well as Draft Regulatory Guide DG-1020, "Monitoring of the Effectiveness of Maintenance at Nuclear Power Plants." APS has also discussed with Baltimore Gas and Electric their comments on the same subject.

Upon completion of our review, APS endorses Baltimore Gas & Electric's comments and NUMARC's proposed comments with the following exceptions relating to NUMARC's comments.

Comment 18¹ (Section: 9.3.1, 9.3.1.1, 9.3.1.2, Page: 14)

The use of a cumulative Risk Reduction calculation does not provide any additional insights. It is recommended that Section 9.3.1.1 only specify criteria for using the Risk Reduction Measure directly. The use of a cumulative Risk Reduction will result in increased costs associated with implementing the Maintenance Rule, with no substantial benefit to be gained from monitoring many of these Structures, Systems, and Components (SSCs).

Given that the large uncertainties associated with a calculated Core Damage Frequency and individual failure probabilities, the benefit to be gained from increased attention and maintenance activities would only be cost effective for those SSCs that have a substantial Risk Reduction Value. It is, therefore, recommended that Section 9.3.1.1 be revised to consider an SSC as Risk Significant if has an individual Risk Reduction Worth of greater than 1.05 (5%). Use of this criteria will allow utilities to focus their efforts on those SSCs that will provide a substantial benefit in terms of plant and public safety.

Comment: 6¹ and 7¹ (Figure 1)

Comment: 19¹ and 20¹ (Section: 9.3.2, Page: 15)

There is no need to impose specific performance criteria on Non Risk Significant SSCs. Other sections of NUMARC 93-01 currently address actions to be taken if Maintenance Preventable Functional Failures occur on Non-Risk Significant SSCs. This avoids the additional cost (without substantial benefit) associated with setting and monitoring performance criteria for Non-Risk Significant SSCs.

¹

NUMARC comments regarding recommended clarifications of NUMARC 93-01, Revision 2A, July 9, 1992, Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants, Resulting From V&V Program Implementation and Industrial Reviews.

