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Contact: T.A. Bergman



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RULES REVIEW  
USNRC

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October 31, 1996

Rules Review and Directives Branch  
DFIPS  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir or Madam:

Subject: Nuclear Regulatory Commission (NRC) Draft Regulatory Guide  
DG-1051, "Monitoring the Effectiveness of Maintenance at Nuclear  
Power Plants"

The Illinois Department of Nuclear Safety (IDNS) appreciates the opportunity to submit comments on NRC Draft Regulatory Guide DG-1051, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." IDNS continues to believe that the quality of maintenance of systems, structures, and components (SSCs) is a prime contributor to reactor safety at a nuclear power plant. We applaud any effort to maintain the plant material condition or increase safety margins designed into the current operating plants.

We reviewed our comments submitted on January 12, 1993, in regard to the maintenance rule and revision 2A to NUMARC 93-01. Many of our comments still apply to revision 3. A copy of the previous comments is attached to this letter.

We are pleased that the current revision requires reference to the Individual Plant Examination (IPE) or Probabilistic Risk Assessment (PRA) when determining the safety significance of SSCs subject to the maintenance rule. We also favor the suggestion that the performance criteria established for each SSC be linked to the reliability assumptions of any safety analyses of which the SSC is a part. This is a step in the right direction, but we believe it falls short of the mark and will not result

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in nearly as consistent a level of maintenance across the family of nuclear plants as could result otherwise. IDNS is disappointed that the NRC has not established IPE/PRA standards to ensure rigorous and current PRAs that can be used with confidence.

The NRC and the industry have increased the operating standards of the current generation of plants to a high level since the Three Mile Island accident. This was a commendable effort. As the electric utility industry moves toward deregulation and a more competitive business environment, the challenge is to maintain the high standards in the face of operations and maintenance cost-cutting efforts.

We believe the operating standards will be determined and maintained in large part by negotiations between licensees and the NRC regarding individual decisions affecting performance under the maintenance rule and other performance-based regulations. For example, the level of risk significance of an SSC and the operating performance criteria established for the SSC before goals are set determine the level of operating and maintenance excellence at a plant. However, the licensee determines these standards and neither the maintenance rule or NUMARC 93-01 Rev. 3 gives firm guidelines on how these standards are to be set. The inevitable result is that without this guidance they will vary widely from licensee to licensee. IDNS would also recommend firmer guidance for classes of equipment in determining availability, reliability, or condition in section 9.3.2. The licensee and NRC inspector should have clearer guidance than the stated "acceptable value" and "reasonable assurance" repeated throughout the section. Otherwise, the rule will be difficult to enforce consistently at desired levels.

For example, when setting plant level performance criteria, will it be satisfactory for different plants of similar design to set widely different criteria? Can Quad Cities, for example, set a performance criteria of ten unplanned scrams per 7000 hours of critical operation, and Dresden set three? In the interest of maintaining the high standards currently achieved, we believe that, where possible, specific lower bounds be set for acceptability and reasonableness. This is needed because the generalities of the proposed Regulatory Guide make it unclear how it will be effectively and consistently enforced.

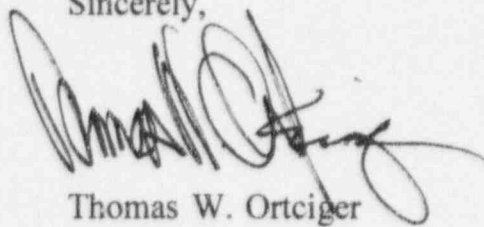
U.S. Nuclear Regulatory Commission

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Thank you for the opportunity to comment. Should you have any questions, please contact Roy Wight, Manager, Office of Nuclear Facility Safety, at 217-785-9851.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas W. Ortziger', written over a horizontal line.

Thomas W. Ortziger  
Director

TWO:sld

Attachment