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P.O. Box 4  
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RULES REVIEW & DIR. BR.  
USNRC  
November 11, 1996

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Mr. David L. Meyer  
Chief, Rules Review and Directives Branch  
DFIPS  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2**  
**BV-1 Docket No. 50-334, License No. DPR-66**  
**BV-2 Docket No. 50-412, License No. NPF-73**  
**Draft Regulatory Guide DG-1051, "Monitoring the Effectiveness of**  
**Maintenance at Nuclear Power Plants"**

Dear Mr. Meyer:

Duquesne Light Company (DLC) is responsible for the operation of Beaver Valley Power Station Units 1 and 2. DLC has reviewed draft Regulatory Guide DG-1051 which is proposed Revision 2 to Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 is being revised to endorse Revision 2 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," which has been updated by the Nuclear Energy Institute. The regulatory guidance is intended to provide flexibility for a licensee to structure its maintenance program in accordance with the safety significance of those structures, systems, and components (SSCs) within the scope of the maintenance rule.

DLC believes the proposed revision represents an improvement to the current regulatory guide. DLC also submits the following specific comments:

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ISP-11 Guidelines  
Manuals  
X IDSR-5 Facility License



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- Page 11, Item 1.2 - Systems with Multiple Design Functions

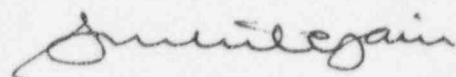
The discussion presented in this section, and in particular the third sentence of the section, could be misconstrued to imply scoping at a component level within systems is expected or encouraged by the Nuclear Regulatory Commission (NRC) for systems with multiple design functions, some of which are not within the scope of the maintenance rule. DLC believes the guidance given by NUMARC 93-01, Revision 2, dated April 1996, discourages scoping at a component level because it leads to maintenance program complexity and unmanageability. The wording of this part of the draft guide should be revised to recognize that the scoping of SSCs may be at a system level. The evaluation of the impact of a component failure should look at the function of the system which is within the scope of the maintenance rule. This does not require the original scoping to be done at a component level.

- Page 12, Item 1.3 - Cause Determination

The last sentence of this part of the draft guide ends with the wording "...would be required." DLC believes this wording should be "...should be considered." NUMARC 93-01, Section 9.4.4, is written to indicate that a decision to disposition the SSC from paragraph (a)(2) to paragraph (a)(1) is to be made based on the results of the cause determination. Thus, the move from paragraph (a)(2) to paragraph (a)(1) is not a requirement or foregone conclusion but a choice based on evaluation of the failure and the circumstances surrounding the failure. In some cases, the appropriate decision may be to keep the SSC in paragraph (a)(2) and provide documentation to support that choice. The wording of the regulatory guide should be changed to allow such an option.

Thank you for the opportunity to comment on this issue. If you have any questions on this submittal, please contact Mr. Roy K. Brosi, Manager, Nuclear Safety Department, (412) 393-5210.

Sincerely,



Sushil C. Jain