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US NRC

64 FR 70098  
Dec. 15, 1999

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CP&L Letter: PE&RAS 00-005  
January 10, 2000

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

**SUBJECT: Comments on Draft Regulatory Guide DG-1082, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants" (64 FR 70098 - December 15, 1999)**

In the Federal Register (December 15, 1999), the NRC issued Draft Regulatory Guide DG-1082 for public comment. Carolina Power & Light Company (CP&L) understands the final regulatory guide will be provided to the Commission by March 31, 2000, and that implementation of the rule will be 120 days after Commission concurrence. Proper implementation will require involvement of Work Control, Planning and Scheduling, Engineering, and Operations and subsequent procedure and computer changes and training for our three stations. CP&L recommends at least 270 days be allotted to allow for proper implementation.

CP&L agrees with the endorsement of the revised section 11.0 of NEI-93-01. However, we offer the following comment concerning Section 11.3.4, Assessment Methods for Power Operating Conditions. The words as written imply that a full assessment is required for removal of service of two low safety significant SSCs. As written, there would rarely be a time when only one Maintenance Rule SSC (High or Low Safety Significance) is removed from service for maintenance.

The first paragraph describes how Technical Specifications or unavailability performance criteria bound the risk when a single High Safety Significant SSC is out of service. If no High Safety Significant SSCs are out of service, no assessment should be necessary. A recommended wording is included below:

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#### **11.3.4 Assessment Methods for Power Operating Conditions**

Removal from service of a single structure, system (when not composed of redundant trains) or component, is adequately covered by existing Technical Specifications requirements, including the treatment of dependent components. Thus, the assessment for removal from service of a single High Safety Significant SSC for the planned amount of time (e.g., the Technical Specifications allowed out-of-service time, or a commensurate time considering unavailability performance criteria for a non-Technical Specification high safety significant SSC), may be limited to the consideration of unusual external conditions that are present or imminent (e.g., severe weather, offsite power instability).

Simultaneous removal from service of multiple High Safety Significant SSCs requires that an assessment be performed using quantitative, qualitative, or blended (quantitative and qualitative) methods. Sections 11.3.4.1 and 11.3.4.2 provide guidance regarding quantitative and qualitative considerations, respectively.

Thank you for the opportunity to comment on this Draft Regulatory Guide. Please contact Daniel Strong at (919) 546-4420 if you have questions.

Sincerely,

John R. Caves  
Regulatory Affairs

cc: Mr. L. A. Reyes, Regional Administrator - Region II  
Mr. J. B. Brady, USNRC Senior Resident Inspector - SHNPP, Unit No. 1  
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