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Comments on Draft Regulatory Guide DG-1082

The purpose of this letter is to provide comments on Draft Regulatory Guide DG-1082, Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants, which endorses the Final Draft of Section 11 of NUMARC 93-01. The Office of Management and Budget approval number is 3150-0011. STP Nuclear Operating Company has a comment regarding the definition of unavailability as outlined in the Final Draft of Section 11 of NUMARC 93-01, "Assessment of Risk Resulting from Performance of Maintenance Activities," dated November 8, 1999. The proposed definition of unavailability from NUMARC 93-01 is as follows:

Unavailability is defined as follows:

$$\frac{\text{planned unavailable hours} + \text{unplanned unavailable hours}}{\text{required operational hours}}$$

Unavailability is considered in two cases:

1) *Maintenance activities*

Equipment out of service (e.g. tagged out) for corrective or preventive maintenance is considered unavailable. Support system unavailability may be counted against either the support system, or the front line systems served by the support system. The treatment of support system unavailability for the maintenance rule should be consistent with its treatment in the plant PSA. Performance criteria should be established consistent with whichever treatment is chosen.

2) *Surveillance testing*

SSCs out of service for surveillance testing are considered unavailable, unless the test configuration is automatically overridden by a valid starting signal, or the function can be restored either by an operator in the control room or by a dedicated operator stationed locally for that purpose. Restoration actions must be contained in a written procedure, must be uncomplicated (generally, a single action), and must not require diagnosis or repair. Credit for a dedicated local operator can be taken only if (s)he is positioned at the proper location throughout the duration of the test for the purpose of restoration of the train should a valid demand occur. The intent of this paragraph is to allow licensees to take credit for restoration actions that are virtually certain to be successful (i.e., probability nearly equal to 1) during accident conditions.

STP's comment is with respect to the above paragraph on maintenance activities. According to the above definition, credit cannot be given for dedicated operator restoration actions. STP Nuclear Operating Company recommends addition of the following to the end of the paragraph:

Equipment out of service may be considered functional (i.e., available) without automatic actuation or alignment capability if restoration of the equipment is possible with reasonable operator action. Reasonable operator restoration action requires trained, qualified, and certified personnel to perform actions in accordance with written procedures. If maintenance does not involve major component disassembly, the component can be declared functional (i.e., available) following or during maintenance when the maintenance has reached a point where the on-duty operations personnel consider the equipment functional (i.e., available).

This will allow utilities to take advantage of reasonable operator restoration activities and more accurately reflect true plant risk. There are many circumstances under which plant equipment can be restored to a condition necessary for mitigation of an accident or transient. Furthermore, actual plant risk profiles should reflect the potential availability of equipment restored to service with uncomplicated actions.

Please contact Rick Grantom at (361) 972-7372 or Allen Moldenhauer at (361) 972-8916 if you have any questions or require additional information.

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Director, Quality & Licensing