



Northern States Power Company

Monticello Nuclear Generating Plant
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US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Comments on Draft Regulatory Guide
Regarding the Maintenance Rule

In the December 15, 1999 Federal Register the Nuclear Regulatory Commission requested comments on Draft Regulatory Guide DG-1082, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Northern States Power Company hereby submits the following comments on this matter:

1. The proposed date for implementation is 120 days after issuance of Revision 3 to Regulatory Guide 1.160. A more appropriate implementation date would be 180 days after Revision 3 to Regulatory Guide 1.160 is published. This would allow sufficient time to carefully examine the implementation guidance and then revise the program to meet any new requirements.
2. We consider the alternative definition for "unavailability" proposed in the January 10, 2000 NEI letter to the NRC commenting on this matter to be an improvement. It is difficult to give final comment on the definition because of the coordination that is necessary between the definition in this program and that of other programs. A document published for comment that discusses the definitions of "availability" for all the industry programs would be beneficial. This would facilitate the goal of having as few definitions for "unavailability" as possible, but allow different definitions where necessary. This includes the definitions associated with NUMARC 93-01 performance criteria, NUMARC 93-01 assessment of risk impact of

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maintenance, NEI 99-02; WANO SSPI, NRC Reliability and Availability Data System (RADS), and possibly the emerging Risk Informed Technical Specifications. Little opportunity has existed to comment on the NRC RADS program which calls for data collection during shutdown conditions where the word "prompt" in the "unavailability" definition is overly restrictive late in an outage. There was an attempt to standardize definitions at a July 19, 1999 workshop in Atlanta, but it appears that this workshop resulted in a definition for NEI 99-02 that has become a benchmark for the other definitions. Final resolution of the definition of "availability" across programs is needed soon to facilitate the development of the next version of the INPO Equipment Performance & Information Exchange (EPIX) program wherein much of this information will be collected in the future. EPIX needs clear, simple definitions finalized in a timely manner to allow completion of the EPIX 3.1 and 4.0 specifications.

We appreciate the opportunity to comment on this draft regulatory guide. For additional information please contact Marcus H. Voth, Licensing Project Manager, at (612) 271-5116.



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