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December 13, 1989

Re: Indian Point Unit No. 2
Docket No. 50-247

Regulatory Publications Branch
Division of Freedom of Information and
Publications Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

54FR 33988

8/17/89

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SUBJECT: Draft Regulatory Guide DG-1001, 'Maintenance Programs for Nuclear Power Plants'

Consolidated Edison Company of New York, Inc., ("Con Edison") welcomes the opportunity to express its views to the Commission on the subject draft Regulatory Guide pertaining to nuclear power plant maintenance programs.

As a member of the Nuclear Management and Resources Council, Inc. ("NUMARC"), we have participated in that organization's efforts in commenting on this draft Regulatory Guide. We have reviewed and accepted the industry-wide position presented by NUMARC. The detailed comments on the draft Regulatory Guide contained in the NUMARC submittal are fully endorsed by Con Edison and should be considered as an adjunct to this letter. Additionally, we offer the following comments.

In discussing the application of a maintenance program, the regulatory guide makes numerous references to plant security in conjunction with plant safety. The first paragraph of the "Introduction" refers to BOP equipment whose failure would "significantly impact...security." In the second paragraph of the "Discussion," maintenance applies to "all parts...that could significantly impact safe operation and security, including the BOP." Although the context of these uses of "security" is slightly different, we are unaccustomed to seeing it defined in this manner. We do not understand what is meant by singling out security (over, for example, reactor protection, feedwater, etc.) and we question whether there is an intent to change the significance of security maintenance. Does the use of "security" throughout the regulatory guide lead to an implied, special significance related to security maintenance that heretofore hasn't existed?

In the first paragraph of Section C.2, "Overall Maintenance Policy", the use of the term "conduct of maintenance" in two separate instances seems to be different. In either case, the context is unclear.

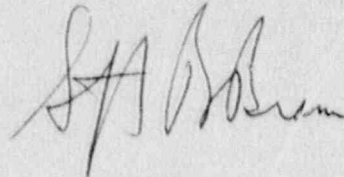
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The "work control process" as described in Section C.4.7 is essentially "planning and scheduling" as described in Section C.4.5. However, these are two different but related elements in the conduct of maintenance. We suggest that section C.4.7 be rewritten to define that distinction. Work controls are used to ensure compliance with plans and schedules, to control changes to plans, to assure protection of the adjacent equipment and to provide for safe return to service.

At Indian Point Unit No. 2, past efforts to improve maintenance have contributed to significant improvements in availability and capacity factor and fewer trips and safety systems actuations. Through our ongoing efforts we expect to continue these trends, and we continue to strive for excellence in these areas.

Should you or your staff have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



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