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FINAL REPLY:

Joe F. Colvin
Nuclear Energy Institute (NEI)

James T. Rhodes
Institute of Nuclear Power Operations (INPO)

Zack T. Pate
World Association of Nuclear Operators (WANO)

TO:
Chairman Meserve

FOR SIGNATURE OF : ** PRI ** CRC NO: 00-0342
Chairman

DESC: ROUTING:
Use of Manual Reactor Scrams as Part of the
Revised Reactor Oversight Process
Travers
Paperiello
Miraglia
Norry
Blaha
Burns/Cyr

DATE: 05/24/00

ASSIGNED TO: CONTACT:
NRR Collins

SPECIAL INSTRUCTIONS OR REMARKS:

May 19, 2000

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop 0-16C1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Chairman Meserve:

The purpose of this letter is to communicate and clarify the industry position on the use of manual reactor scrams as part of the revised reactor oversight process.

We commend the Commission for its leadership in developing the new oversight program that shows clear potential for great improvement over previous processes. We thank the Commission for its support in accelerating the development of alternative indicators to alleviate industry concerns over possible unintended consequences from the counting of manual reactor scrams as part of the revised program.

The industry, through NEI, developed a position regarding the use of manual reactor scrams at a special meeting of the NEI Executive Committee on March 28, 2000. Since that time, the Institute of Nuclear Power Operations (INPO) Board of Directors and the World Association of Nuclear Operators (WANO) Governing Board have met and fully support the industry position developed by NEI. The following principles express the unified industry position:

- There is a significant level of concern within the industry over the possibility of unintended consequences that may result from the use of performance indicators that count manual scrams;
- As an industry, we strongly suggest that the NRC not include manual scrams in the performance indicators;
- Notwithstanding this concern, we believe that the reactor oversight program should move forward with the understanding that we accelerate the development of alternative performance indicators that, when validated, would alleviate these concerns;

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The Honorable Richard A. Meserve
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- The development of these alternative performance indicators should take place according to a set schedule, such that they can be validated and implemented by the end of this year, before final program implementation.

The U.S. NRC is held in high esteem both in the U.S. and internationally, and regulators in other countries often emulate U.S. NRC programs. This additional consideration is important to WANO.

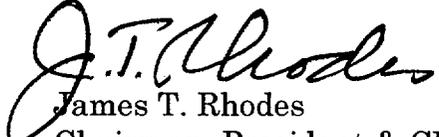
As you are aware, NEI has established a special industry task force to work with NRC staff and other stakeholders on the development of alternative indicators. Work on these indicators has already begun, and we appreciate the priority and the resources being applied by the NRC to resolve this important matter.

We will continue to ensure the full resources of the industry are applied to this project. We thank the Commission and senior NRC management for support in addressing these concerns.

Sincerely,



Joe F. Colvin
President & CEO,
Nuclear Energy Institute
(NEI)



James T. Rhodes
Chairman, President & CEO,
Institute of Nuclear Power
Operations (INPO)



Zack T. Pate
Chairman,
World Association of
Nuclear Operators (WANO)

c: The Honorable Greta J. Dicus, Commissioner
The Honorable Nils J. Diaz, Commissioner
The Honorable Edward McGaffigan, Jr., Commissioner
The Honorable Jeffrey S. Merrifield, Commissioner
William D. Travers, EDO