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ROBERT C. MECREDDY
Vice President
Nuclear Operations

April 12, 2001

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Rules and Directives
Branch
USNRC

Mr. David Meyer
Chief, Rules and Directives Branch
Office of Administration,
Mail Stop T6D59,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-001

Subject: Request for Public Comment on the First Year of Initial Implementation of the Reactor Oversight Process (65 Fed. Reg. 78215)

Dear Mr. Meyer,

Rochester Gas and Electric agrees in principle with the Nuclear Energy Institute's comment letter (dated April 13, 2001) in response to 65 Federal Register 78215. Specifically:

- The industry needs to have one set of metrics with which to gauge its performance. The inconsistencies between NRC, WANO, Maintenance Rule, and probabilistic safety assessments (PSA) need to be addressed during this second year of the ROP. (Questions I.3, II.2)
- NRC Inspection of the reporting of the PIs should be of an oversight nature, rather than of a detailed quantitative nature. This provides a better use of resources in providing meaningful feedback to the utility regarding the robustness of its PI reporting process. (Questions I.3, II.2)
- The NRC needs to enhance public awareness of the scope of the ROP, i.e. the Inspection Process, SDP, as well as the PIs. The public's focus has been on PIs due to the exposure on the NRC Web page. Visually, the PIs appear to be a much greater part of the ROP than the Inspection Process and SDP are while in actuality, it is the reverse. (Question I.5)
- The NRC Web site's convention of denoting "no color" findings in blue may be misleading to the public. The ROP is based on color for gradation of outcomes and values; to use a color for something that is said to be of "no color" is inappropriate and confusing. (Question I.5)
- The NRC should implement a graded "reset" of colored inspection findings and all fault exposure hours. The current performance of the plant should be reflected in the ROP. When a PI threshold or a finding is addressed and resolved, the resultant change in the indicator trend line should more closely match the current state of the plant. (Question I.6)

Very truly yours,

Robert C. Mecreddy

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