



NUCLEAR ENERGY INSTITUTE

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SENIOR VICE PRESIDENT AND
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NUCLEAR GENERATION

June 20, 2001

Mr. Samuel J. Collins
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-5 E7
Washington, DC 20555-0001

Dear Mr. Collins:

The U.S. nuclear industry considers its commitment to the collection and sharing of industry data and measurement of performance through performance indicators as an important component of its ability to achieve excellence in operations. In that regard, the industry decided in 2000 to review its data reporting activities to ensure industrywide effectiveness and consistency.

To assist in this review, NEI formed the Data Review Working Group to investigate industry data reporting practices and provide recommendations for enhancing effectiveness in that area. The Working Group included representatives from industry, the Institute of Nuclear Power Operations (INPO) and the World Association of Nuclear Operators (WANO). Frank Gillespie and Pat Baranowsky of your staff also participated.

The Data Review Working Group recommended proceeding with industry efforts to consolidate the industry data collection activities relative to WANO Performance Indicators, NRC Reactor Oversight Performance Indicators, Monthly Operating Report, and the INPO Equipment Performance and Information Exchange (EPIX) database. The full recommendations and principles proposed by the Data Review Working Group are enclosed. The recommendations of the Working Group were accepted by the NEI Nuclear Strategic Issues Advisory Committee (NSIAC). The NSIAC delegated the implementation of the recommendations to INPO.

INPO established the Consolidated Data Advisory Committee at the beginning of this year to:

- resolve inconsistencies among various industry reporting requirements,

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- develop an industry guidance document that establishes a single set of definitions for reporting data elements,
- establish a mechanism to address ongoing questions regarding data definitions and/or reporting requirements,
- determine the appropriate levels of data to support key reporting requirements, and,
- provide advice on methods to simplify the business processes associated with data reporting and submittal.

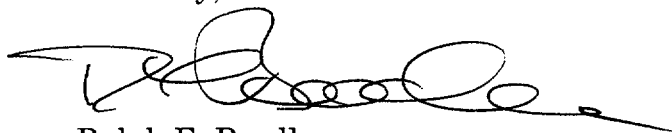
The Advisory Committee is chaired by Mr. Jeffrey Benjamin, Vice President, Licensing and Regulatory Affairs, Exelon Nuclear, and includes representatives from numerous utilities. INPO and NEI representatives are also members of the Advisory Committee.

Working with the Advisory Committee, INPO has formed a project team, which includes loaned industry personnel, to address the recommendations. The project team is currently developing a consolidated data element manual that will contain a comprehensive set of data definitions. The draft of this data element manual will be distributed later this year for a thorough industry review. In addition, the project team will develop a web-based data entry interface to reduce redundancy of reporting and enhance data validity.

Following preliminary meetings, the Advisory Committee recognized the potential value of NRC input to these efforts and, recently, INPO requested support from the NRC. Frank Gillespie and Pat Baranowsky were designated as observers to this Advisory Committee. Their participation at a recent meeting provided valuable input for the Advisory Committee to consider.

INPO and NEI will continue to keep you informed of the progress of the Advisory Committee's efforts and the status of the consolidated data effort. Should you have questions in the meantime, please feel free to contact me or Fred Tollison of INPO at 770-644-8231.

Sincerely,



Ralph E. Beedle

Enclosures

c: Alfred C. Tollison, Jr., INPO

CONSOLIDATED INDUSTRY DATA COLLECTION AND REPORTING

Situation:

- Data collection practices within the industry have evolved over many years to meet varying needs and audiences.
- As a result, differences now exist throughout the industry in data definitions, reporting requirements, methodologies for calculation, etc.
- Furthermore, to accommodate the varying needs and audiences, a number of data entry/collection methods have been created resulting in duplication.

Impact of Situation:

- Data definition differences could lead to variations in reporting (even in cases where definitions are intended to be the same).
- While differences between methodologies may result in negligible impact from a risk perspective, indicators based on the data may result in perceptible differences when making comparisons.
- Perceptible differences in data may reduce industry, regulator and public confidence in the data.
- Redundant data entry activities are costly and inefficient for the industry.

Background:

An Industry Data Review Group, comprised of representatives from industry, INPO, NEI, NRC and WANO, was established to:

- Identify, review and evaluate the types of data and data collection practices throughout the industry,
- Review the data for consistency, definition and duplication, and,
- Provide the NEI Nuclear Strategic Issues Advisory Committee (NSIAC) with recommendations for improvements and efficiencies in the processes associated with industry data collection, reporting and dissemination.

The group has completed its efforts and compiled its recommendations.

Recommendations:

- Achieve industry and NRC acceptance of the proposed “Principles of Performance Indicators and Data,” developed by the Industry Data Review Group. The principles describe the industry approach to data definitions, collection practices and dissemination (including, applications, and integrity issues).
- Establish a standing committee consisting of representatives from NEI, INPO, NRC and industry with expertise in PRA, Maintenance Rule implementation, WANO and NRC indicators. The committee should:
 - 1) immediately address existing data inconsistency issues (e.g., unavailability),
 - 2) develop an industry guidance document that delineates a comprehensive set of data definitions (data dictionary),
 - 3) establish a mechanism that will address and rectify any data definition questions or concerns that arise in the future.
- This Standing Committee should utilize the Performance Indicator Revision Process established for the Reactor Oversight Process Performance Indicators to address data definition or data requirement issues that arise in the future.
- Develop an expandable web-based system for data collection that will reduce data input redundancies while allowing for information queries that can meet multiple user needs.
- Develop a project plan that includes training to achieve the above recommendations in a timely manner such that the data definition guidance is completed and development of the web-enabled data collection vehicle is begun by early 2001.

PRINCIPLES: Performance Indicators and Data

A clear, concise and consistent set of definitions for performance indicators and data should be established to achieve consistency

If different indicators or data elements are necessary for different applications, then such differences should be justified and communicated to all affected entities. In addition, the terminology should be dissimilar to eliminate confusion among different indicators and data elements.

If different indicators and data elements are warranted for end-user application, then every effort should be made to minimize the impact on the data input. Such applications should include algorithms to develop specific end-user reports so as not to directly affect raw data input.

Potential consequences associated with performance comparisons, thresholds, goals, and other information derived from data collection, reporting and use should be recognized and understood.

Industry organizations should define and communicate the required level of assurance for each data element based upon the intended use and application of the data.

The industry should apply appropriate controls to the collection and the reporting of data, including appropriate corrective actions when errors or deficiencies are identified.

Data deemed to be proprietary by a utility should be clearly communicated to INPO, NEI and NRC, e.g., planned outage duration.

Access to and availability of data from a consistent source for operational use and risk assessment could obviate the need for supplemental or duplicative reporting.

Effective training and communication are essential to resolve data collection and interpretation issues in a consistent manner. A rigorous process to identify and resolve these issues should be implemented. A structured and disciplined process must be established for the development of new programs or processes that may involve data collection and reporting data in the future.

A single industry authority should be created to maintain consistency in establishing and maintaining performance indicators and data elements; and resolving interpretations and issues.

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