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July 21, 2003

Mr. Bruce A. Boger  
Director, Division of Inspection Program Management  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Boger:

The Consolidated Data Entry (CDE) project was undertaken by the Institute of Nuclear Power Operations (INPO) at the industry's request to consolidate, wherever possible, offsite data reporting activities. The project involves collection of data associated with World Association of Nuclear Operators (WANO) performance indicators, NRC Reactor Oversight Process (ROP) performance indicators, NRC Monthly Operating Reports (MOR), and INPO Equipment Performance and Information Exchange (EPIX) system. As the sole collection and storage repository for a wide array of data that forms the basis for reports to multiple organizations, CDE provides our members a vehicle for maintaining data consistency and safeguarding against inadvertent errors. It also represents a substantial opportunity to improve efficiency in collecting and reporting data. It is important to note that the transition to CDE system will not change the processes for NRC licensees to submit Reactor Oversight Process performance indicator or Monthly Operating Report data to the NRC.

In December 2002, we provided draft copies of two documents for review and comment in relation to the Consolidated Data Entry project. In response to that request, we have had ongoing discussions with members of the NRC staff. Based on these discussions, we have determined that we need to clarify the intended review and relationship of these documents to NRC activities. We have enclosed updated drafts of both documents to support the reviews discussed below.

The "Consolidated Data Entry Data Element Manual," Revision E (July 2003) provides the data entry guidance to be used by licensees to support the web-based CDE software. The data element manual relies on NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," to provide reporting guidance for most data supporting the NRC ROP performance indicators. However, Section 3 of the manual on Generation Occurrences (unit shutdowns, reactor shutdowns, and power changes) contains amplifying information. Therefore, for ROP consistency purposes, INPO seeks NRC review and comment on this section of the manual.

The data element manual also incorporates the reporting requirements for the NRC MOR based on the guidance in NRC Generic Letter 97-02. INPO seeks NRC review and comment on the consistency of Section 3, "Generation Occurrences" with NRC MOR expectations.

Mr. Bruce A. Boger

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The "Consolidated Data Entry Process Description," Revision C (June 2003) describes the objectives of CDE and provides an overview of the process. This document discusses the data submittal process to support ROP and MOR and is provided for your information and background only. We are not seeking comments on this document.

Please note that these two documents are in draft and they contain proprietary INPO or WANO information that is privileged, confidential, or protected by copyright belonging to INPO or WANO. Please ensure that they are controlled in accordance with the copyright provision shown on the documents and with the NRC and INPO Memorandum of Agreement.

In addition to the reviews discussed above, we are also seeking a point of contact to support software testing activities. Specifically, we need to verify that the data files generated by the CDE software are compatible with the methods used by the NRC to promote licensee submittal information to your web site. Beginning in early 2004, the licensee ROP data submittals will be using files generated in CDE.

Consolidated Data Entry has already been piloted by approximately 20 plants during March through July 2003, and our members will begin a parallel run in August 2003. The system is expected to be fully implemented in November 2003 to support reporting of fourth quarter 2003 data to the NRC in January 2004.

To support the schedule for CDE implementation, we will appreciate your comments by August 29, 2003. We are available to meet in August or September to discuss any concerns or comments with appropriate NRC personnel.

If you or your staff have any questions, please contact me at (770) 644-8207 or Gary Welsh, department manager, Consolidated Data Entry, at (770) 644-8412.

Sincerely,



George Felgate  
Vice President and Director  
Analysis Division

GF/gw

Enclosures: "Consolidated Data Entry Data Element Manual," Revision E, July 2003 (3 copies)  
"Consolidated Data Entry Process Description," Revision C, July 2003 (3 copies)

cc/wo: Mr. Samuel J. Collins  
Mr. Joseph W. Shea  
Mr. Charles R. Brooks  
Mr. A. C. Tollison, Jr.

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