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SUBJECT: Comments on Administrative Ltr 94-11, "Request for Voluntary Comments on Pilot Program for NRC Recognition of Good Performance by NPPs." Suggests that subj feedback be communicated to licensees in more private way.

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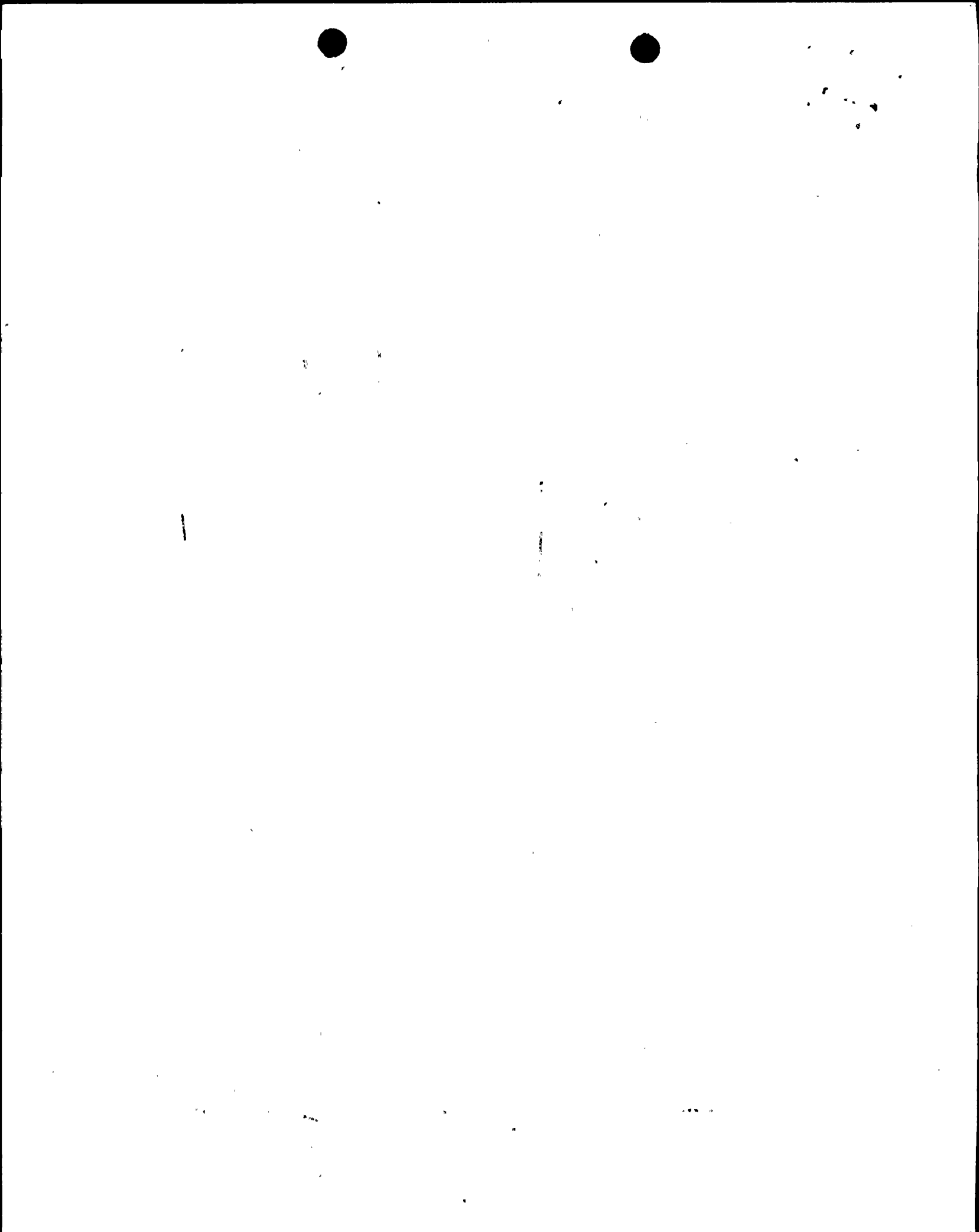
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B. Ralph Sylvia  
Executive Vice President  
Nuclear

October 3, 1994  
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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

RE: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Nine Mile Point Unit 2  
Docket No. 50-410  
NPF-69

**Subject: Request For Voluntary Comments On The Pilot Program For NRC Recognition Of Good Performance By Nuclear Power Plants (Administrative Letter 94-11)**

Gentlemen:

Niagara Mohawk endorses this program since it recognizes plants that have demonstrated good overall safety performance and provides feedback on what performance it takes to become a "good performer." However, appropriate changes to the program are needed to prevent this feedback from becoming public domain. It is suggested that this feedback be communicated to licensees in a more private way.

Niagara Mohawk is highly sensitive to the impact of adverse public, regulatory and financial community reactions. Failure to be included on, or the possibility of removal from, the NRC's good performer list could be misinterpreted by those outside the nuclear industry and could result in a negative perception of otherwise acceptable safety performance. Consideration of new programs to gain or recover the NRC's good performer recognition does not necessarily improve safety performance, but could increase the cost burden on utilities.

A proposed alternative method would be to privately communicate the NRC recognition of outstanding safety performance. Similar practices are currently in place at the Institute of Nuclear Power Operations. These practices have proven to be an effective means of communicating to senior utility executives the overall performance of a utility as measured against industry standards.

Niagara Mohawk appreciates the opportunity to provide comments on this program.

Very truly yours,



B. Ralph Sylvia  
Executive Vice President - Nuclear

BRS/RAH/lmc

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