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DOCKET NUMBER  
PROPOSED RULE PR-50 (15)  
(45 FR 6793)

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Proposed Rule on Operational Data Gathering  
(45FR 6793) January 30, 1980

Gentlemen:

The subject proposed rule would require power plant licensees to participate in the Nuclear Plant Reliability Data System (NPRDS). While Bechtel Power Corporation is not a plant owner or active participant in the NPRDS program, we have had experience in the preparation of information to facilitate use of the system and in the review and utilization of data produced. On the basis of this experience, we would like to contribute the following observations regarding the proposed rule.

There is substantial value in having a comprehensive and consistent data base on component and system performance to help assess plant safety as well as to identify areas for safety and reliability improvement. However, we believe that a regulatory mandate to utilize the NPRDS program is unnecessary and potentially counter productive.

The proposal suggests that such a regulatory mandate would improve the quality, scope of participation and completeness of the data base. The April 29, 1977 National Energy Plan is cited as recommending mandatory use of NPRDS to enable NRC and industry to develop more reliable data "to improve reactor design, construction and operating practice" presumably to enhance the stated goals of NPRDS in improving system reliability, plant availability, improve design, etc. Several of the goals would be of assistance to NRC in the safety assessment of proposed designs. However, it is believed that the principal long range benefits of the NPRDS system will accrue to plant owners. Owners have a strong incentive to improve plant availability, to optimize plant designs and to reduce the risk of failures and accidents that damage equipment and cause lengthy and costly recovery programs.

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We believe that the owners acting individually as well as through the INPO and NSAC organizations will have substantial incentive to voluntarily participate fully in a meaningful NPRDS program. Mandatory imposition of the system will likely result in a strong effort to minimize the scope of equipment and system coverage because of the unnecessary burden of rigid compliance with regulations as interpreted by NRC field personnel who are generally prevented from exercising judgement when enforcing rules. Since NRC's scope, properly and legally, is limited to systems, components and structures affecting safety, it is not likely that the data base would be voluntarily extended beyond these items. The complexities involved in establishing the interface between safety and non safety related information and the risk of regulatory actions on relatively trivial issues would be strong disincentives.

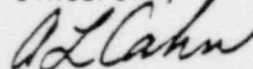
If the NPRDS program, or any similar program, is to remain viable and grow, it must remain a voluntary system that can provide visible benefits back to the groups required to supply data to the system. If the principal use of the system is oriented toward reliability information, we believe that a data base that is 90-95% complete and accurate would be just as useful as one that is 100% correct. However, it is difficult to see how this could be tolerated if the system is required by regulation.

We believe the proper role of the Nuclear Regulatory Commission would be to:

1. Monitor and evaluate the quality of data input to the NPRDS system and the resulting output information. Make constructive suggestions for improvements.
2. Demonstrate to industry how adequate and reliable data can be utilized to assess safety, improve the regulatory process and optimize requirements. Identify deficiencies in the existing data base that prevent effective use for these purposes.
3. Periodically examine the Commission's requirements for LER reporting to determine whether requirements can be reduced or should be modified as a result of evaluation of the NPRDS program, the activities of INPO and EPRI/NSAC, and NRC staff experience in the analysis of LER's.

In summary, we strongly urge that you do not make the NPRDS a mandatory requirement. We believe that the future value of the system could be placed in jeopardy by such an action.

Sincerely,



A.L. Cahn  
Manager of Engineering  
Thermal Power Organization