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March 11, 1980

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTENTION: Docketing and Service Branch



Dear Sir:

The ANSI N18-20 Subcommittee would like to take this opportunity to submit written comments to the Advanced Notice of Rulemaking regarding the Nuclear Plant Reliability Data System (NPRDS) as published in the Jan. 30, 1980 Federal Register, pages 6793 through 6795.

The ANSI N18-20 Subcommittee has a vital interest in this action since it has been providing overall technical guidance to NPRDS since its developmental phase starting in 1973.

The ANSI N18-20 Subcommittee is firmly opposed to regulations making NPRDS mandatory and involving this industry developed and supported data system in the regulatory process. The Subcommittee believes that the proper role of the NRC should be as a participant in the Subcommittee deliberations and as a major user of the data base. We concur with the GAO conclusion, cited on page 6794 of the Federal Register notice that a rulemaking proceeding can provide the industry, the public, and the NRC with an opportunity to get their views on the record. However, we feel that the intent of this GAO conclusion is being subverted by the statement of NRC's intent to make participation in the NPRDS mandatory unless comments received provide sufficient reasons to the contrary.

In 1977 the NRC extensively investigated the possibility of mandatory participation in NPRDS. This effort culminated in a letter from the Advisory Committee on Reactor Safeguards recommending that participation in the NPRDS remain voluntary. (Attachment A.) This recommendation is supported by the 1979 GAO conclusion in your Advanced Notice "that it was unlikely the NRC could justify mandatory NPRDS participation when factors such as additional industry costs, limited expected safety benefits, and duplication of NRC's LER system were considered."

Acknowledged by card... 3-24-80, *cr*

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The report of the President's Commission on the Accident at Three Mile Island and NUREG-0585 do not provide justification for reversing these earlier findings. The true need identified by these documents is not for more extensive collection of data, but for more comprehensive utilization of data from existing sources. A large body of data is currently available from such sources as the NRC Grey Book, LER's, NERC reporting, and NPRDS. Mandatory participation in the NPRDS would not add sufficient information to the existing data systems to justify the disadvantages associated with mandatory participation.

The Special Review Group of the NRC's Office of Inspection and Enforcement did indicate in NUREG-0610 that they felt that mandatory participation would provide a more comprehensive and complete data base for evaluating reliability and for early identification of failure trends. While we acknowledge that mandatory participation would result in an increased amount of data, we do not believe that it follows that mandatory participation would result in lasting improvement of the quality of data. Lasting improvement in participation and reporting consistency and accuracy can only be achieved by continued demonstration to the reporting personnel that the data is important and that it is being used to enhance the safety and reliability of their nuclear generating plants. We believe that mandatory, enforced participation can only be counter-productive in the long run.

The following comments are offered on the nine features identified in the Advanced Notice as being considered for the proposed rule. The intent of features 1 through 7 have already been addressed and most are covered in the existing NPRDS Reporting Procedures Manual. A task force was established in 1978 by the ANSI N18-20 Subcommittee and the results from the work of this group are presented in responses to the appropriate specific questions in the Advanced Notice. The inconsistencies and inaccuracies in some of the reported data are being addressed and additional guidelines and quality control are being implemented. Features 8 and 9, which address reduction and restructuring of LER data, should be considered regardless of the outcome of the proposed rulemaking.

Our comments in response to the list of twenty-one specific questions in the Federal Register notice are included as Attachment B. The ANSI N18-20 Subcommittee would be pleased to meet with you to discuss these responses in more detail.

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The NRC representatives on the ANSI N18-20 Subcommittee have abstained from participation in or approval of this response.

Sincerely,



R. L. Haueter
Chairman,
ANSI N18-20 Subcommittee

RLH/ra
Encl.