

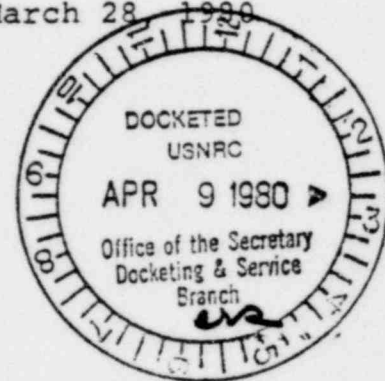
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DOCKET NUMBER  
PROPOSED RULE PR-50 (36)  
(45 FR 6793)

March 28 1980



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

Dear Mr. Chilk:

Con Edison has received the Advance Notice of Proposed Rule-making concerning mandatory participation in the Nuclear Plant Reliability Data System (NPRDS) and is pleased to offer our comments.

The NPRD system has undergone significant changes since its inception as a result of continuing input from both the industry and the Nuclear Regulatory Commission. In 1978 the ANSI N18-20 Subcommittee, which oversees the system, established a Task Force to review, clarify, define and recommend rules and procedures to the Subcommittee in a number of areas including reportable scope, data quality and usage, rules for reporting and data base maintenance. Recommendations made by the Task Force have already been implemented and the Task Force is continuing to provide meaningful feedback to the system.

While Con Edison recognizes that the NPRDS must continue to improve, we believe that the efforts of the Subcommittee, the Task Force and the industry participants demonstrate that such improvements will best grow out of the type of free interchange of ideas and experience fostered by voluntary participation.

The disadvantages associated with mandatory participation include those already cited by the General Accounting Office and described in your Advance Notice. Con Edison agrees with the General Accounting Office in their assertion that the disadvantages make it difficult to justify mandatory participation in the NPRDS.

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Acknowledged by card.....