

**NORTHEAST UTILITIES**

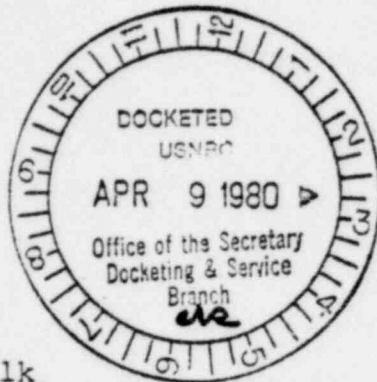


THE CONNECTICUT LIGHT AND POWER COMPANY  
THE HARTFORD ELECTRIC LIGHT COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

P.O. BOX 270  
HARTFORD, CONNECTICUT 06101  
(203) 666-6911

DOCKET NUMBER  
PROPOSED RULE PR-50 (25)  
(45 FR 6793)

WILLIAM G. COUNSIL  
VICE PRESIDENT  
NUCLEAR ENGINEERING AND OPERATIONS



March 27, 1980  
WGC-80-G-223

Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Northeast Utilities has reviewed the advance notice of proposed rulemaking relative to 10CFR Part 50, "Domestic Licensing of Production and Utilization Facilities; Operational Data Gathering", as published in the Federal Register on January 30, 1980. We understand that the Commission is considering amending its regulations to require that participation in the Nuclear Plant Reliability Data System (NPRDS) be made mandatory for power reactor licensees. The purpose of the advance notice is to solicit advice and recommendations on several questions to aid the NRC in its deliberations concerning the amendment of these regulations.

Currently, NPRDS is a voluntary reporting system for equipment and component failures important to plant safety. Northeast Utilities has participated in this program since its inception, first with Connecticut Yankee and later with our Millstone Units. We are supportive of the NPRDS concept and believe that as the data bank develops it will provide an invaluable means of increasing plant safety and reliability. In addition to providing direct support for NPRDS, we also serve on the ANSI N18-20 Subcommittee, under whose aegis the program was developed. Thus, we have a demonstratable concern in the current use and future development of NPRDS.

A. General Comments

In reviewing the questions and statements in the proposed rulemaking, we find many areas where we are in general agreement with the NRC. However, there are a few areas where the tone of the questions would seem to imply that harsh action can be expected on the part of

L-4-1, 1980

the NRC. It is these questions with which we are most concerned. The NPRDS has been an industry sponsored and funded program from its inception. Participation has been on a voluntary basis, left up to the discretion of the individual utilities.

By the NRC's own count, sixty (60) out of sixty-two (62) nuclear units are participating in the program to various degrees; this is over 95% participation. We also would like to point out the great strides the industry has made in supporting this time consuming program. We understand that by the end of 1979, the total number of reports submitted to NPRDS exceeded 180,000. This is quite an accomplishment for a program that was started less than six (6) years earlier. In view of this overwhelming support by the industry, we do not understand why the NRC is considering the imposition of mandatory reporting requirements supplemented with inspection and enforcement actions and penalties for non-compliance. In our view, this punitive attitude can only serve to dampen the enthusiasm of the industry.

We strongly urge that the NRC not make participation in the NPRDS program mandatory. In addition, we believe that the proper role of NRC should be as a participant in the ANSI N18-20 Subcommittee and as a user of the NPRDS data. We recognize that there is a continuing need to upgrade the NPRDS program including improvements in reporting consistency and accuracy. It appears to us that full participation in the program by all nuclear units, while desirable, is not essential; we doubt that the two units not currently participating would have a statistical significant impact on the data bank. Further, we sincerely believe that as the program continues to grow and its benefits in enhancing plant safety and reliability become more apparent, it will achieve a 100% participation.

We believe it essential that the NRC recognize the progress made to date, and in recognition of this progress, the industry be given time to further upgrade the program and correct existing deficiencies on a voluntary basis.

If, after the NRC completes their review of the responses to the proposed rulemaking, it remains convinced that mandatory participation in NPRDS is necessary, we recommend consideration be given to the issuance of a Regulatory Guide rather than conducting a rule-making proceeding.

#### B. Responses to Specific Questions

1. "How should NPRDS effort be apportioned between plant availability and improving plant safety? Where should the emphasis be?"

##### NU Response

NPRDS was developed to provide to the nuclear industry meaningful, long-term reliability statistics on systems

and components important to nuclear safety. It should continue to be reliability oriented and the emphasis should remain solely upon safety related systems and components.

2. "How should NPRDS data be used by industry, the public and the NRC to achieve this emphasis? What other uses, if any, should be made of NPRDS data?"

NU Response

The NPRDS data should be used by the industry either directly or indirectly for such things as:

- (1) Improvement of component and system reliability.
- (2) Optimizing surveillance and test schedules.
- (3) Identifying failure trends and wearout patterns.
- (4) Providing manufacturers with field performance data on their products.
- (5) Evaluating spare parts requirements.
- (6) Probabilistic analyses of various postulated accident sequences.

3. "How should NPRDS data be gathered and analyzed to facilitate recommended uses?"

NU Response

Gathering of NPRDS data should remain the responsibility of the power station. Analyses of the data should be performed by specific organizations as required to fulfill their commitments; i.e., INPO, NRC and utilities.

4. "If NPRDS reporting is made mandatory, what form of NPRDS management (i.e., industry, NRC or joint industry/NRC) will best lead to fully responsive reporting and to meaningful analysis?"

NU Response

The management of NPRDS should remain as it is now; i.e., joint utility, NSSS vendor and NRC.

5. "To what extent, if any, should the NRC manage NPRDS reporting and data analysis?"

NU Response

We do not believe the NRC should actively manage any part of the NPRDS activity.

6. "If NPRDS reporting is made mandatory, how should the NRC inspect and enforce mandatory licensee participation? Should licensees be subject to enforcement penalties for non-compliance with NPRDS requirements?"

NU Response

As mentioned previously, we do not believe NRC should make NPRDS reporting mandatory. If they should, the accuracy of reporting is available for review by the NRC from reports issued by the NPRDS contractor. The tacit assumption that NRC must inspect and enforce if participation is mandatory, demonstrates our expressed concerns.

7. "What improvement should be made to the NPRDS Manual or other guiding vehicles to enhance uniformity of reportable scope, completeness and accuracy of reporting, and usability of the data?"

NU Response

The primary problem with reportable scope has been the lack of an adequate standard which can be referenced in the procedures manual. This problem has been recognized and steps are being taken to correct it. The ANSI N18-20 Subcommittee last year established four working task forces to develop reportable scope lists specifically for NPRDS and this work is well underway. As more experience is gained in utilizing NPRDS output, modifications will be made.

8. "Should the NPRDS and LER systems be restructured to avoid overlapping data gathering requirements or should present systems formats be retained?"

NU Response

LER's are designed for rapid reporting of safety related events, both equipment related and non-equipment related. NPRDS is designed to collect data regarding the long term reliability of safety systems and components. To the extent that some equipment failures are not significant safety related events requiring rapid notification, they should be dropped from the LER system and be reported through the NPRDS.

9. "In the event you recommend eliminating duplication between LER and NPRDS reporting, how would you restructure each systems reporting requirements? Comment specifically on the ideas expressed in summary Paragraph 8 of limiting LER reporting to items of major safety significance. Should such restructuring be done simultaneously with making NPRDS reporting mandatory or should ongoing NPRDS and LER upgrading efforts continue separately?"

NU Response

We agree that LER's should be limited to items of major safety significance. Restructuring of the LER system should not take place until the NRC is convinced that the utility industry can voluntarily report the non-significant safety related equipment failures to NPRDS.

10. "Do you agree with the summary Paragraph 2, estimate of a minimum of 3,500 components as an appropriate scope? Assuming a reportable scope with 3,500 components, how many NPRDS failure reports should be expected per month per operating plant?"

NU Response

The N18-20 Subcommittee is presently working on a new listing of reportable scope. Some modest change in the number of components in the reportable scope is expected. The number of failures per month in a plant is small enough so that a meaningful average cannot be established, especially in view of the effects of higher failure reporting during refueling outages. We are concerned with the implication that benchmarks such as failures/month can or should be used in evaluations.

11. "What alternatives to mandatory reporting would provide the data necessary for complete and accurate reliability analysis and at what level of assurance?"

NU Response

As mentioned previously, we do not believe that 100% reporting by utilities is essential. However, NU fully supports the concept of 100% reporting by the utilities, but not at the expense of mandatory involvement in the regulatory process with attendant legal, political and enforcement activities. We currently have over 95%

reporting participation. With the expected usage of NPRDS data by NSAC and INPO, we expect the participation to further improve and reach 100% without regulatory requirements.

Accuracy of data is, of course, of prime importance. The ANSI N18-20 Subcommittee and its contractor, Southwest Research Institute, have been holding yearly training seminars for utilities and other interested parties to improve the data input. In addition to the computer edit checks, the NPRDS contractor performs a 100% check of every failure report.

12. "How should the NPRDS be funded? Should industry fund fully or should the NRC contribute funds to support the industry system?"

NU Response

We believe the NPRDS should be funded primarily by the utilities but partial funding from the NRC, in recognition of their participation and use of the program, is appropriate. It should be emphasized that the major cost of the NPRDS will continue to be borne by the utilities through their efforts in supplying data.

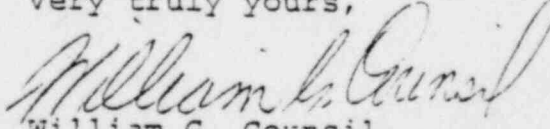
13. "Should the six (6) early design plants excluded when the NPRDS commenced continue to be excluded or should all plants be required to participate?"

NU Response

The inclusion of the six (6) early design plants would do nothing towards improvement of NPRDS which was designed as a long-term reliability data base.

It is intended that the preceding comments be constructive and provide guidance to the NRC in their consideration of the proposed rulemaking. We are genuinely concerned with the continued growth of the NPRDS and believe that a sound, rational approach to the regulations is necessary if it is not to be stifled.

Very truly yours,

  
William G. Council  
Vice President

WGC/jmm

cc: C. Walske      AIF  
    J. J. Kearney    EEI