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MAINE YANKEE ATOMIC POWER COMPANY •

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

Attention: Docketing and Service Branch

Subject: Proposed Rulemaking on the Nuclear Plant
Reliability Data System

Dear Sir:

The Maine Yankee Atomic Power Company would like to take this opportunity to comment on the Proposed Rulemaking regarding the Nuclear Plant Reliability Data System (NPRDS) as published in the January 30, 1980 Federal Register pages 6793 through 6795.

The Maine Yankee Atomic Power Plant was one of the six plants involved in the original NPRDS pilot program in 1974, and has continued participation in the NPRDS through to the present. Thus, we have a vital interest in the proposed action.

Maine Yankee is firmly opposed to regulations making NPRDS mandatory. Mandatory participation in the NPRDS would not add sufficient information to the existing data systems to justify the disadvantages associated with mandatory participation. These disadvantages have been accurately outlined by the ANSI N18-20 Subcommittee in their letter to you dated February 26, 1980. Maine Yankee fully endorses both the comments and conclusions provided by the Subcommittee.

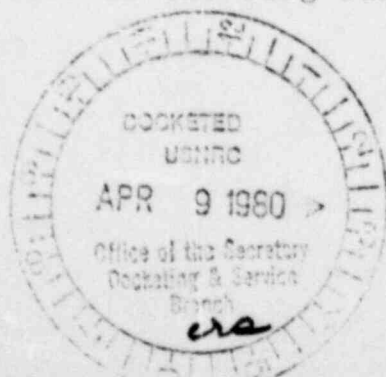
Maine Yankee agrees that the industry should continue to work to improve the system and the use of its data in effecting meaningful improvements in reactor system safety and reliability. However, mandatory enforced participation will not accomplish this improvement, and in fact, may prove to be counter productive in the long run.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY

J. B. Randazza
J. B. Randazza
Vice President

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Acknowledged by card... 4-9-80