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March 31, 1980
NS-TMA-2225

Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
1717 H Street
Washington, D. C. 20555

SUBJECT: Mandatory Participation in NPRDS

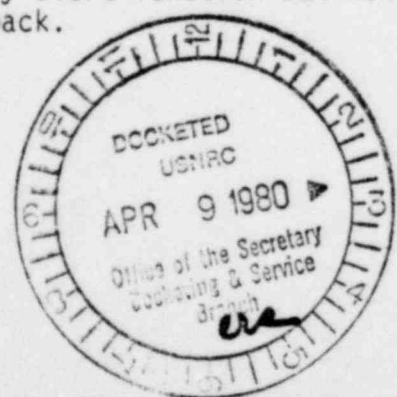
Dear Mr. Chilk:

Westinghouse takes this opportunity to comment on the proposed rulemaking for mandatory participation in the Nuclear Plant Reliability Data System (NPRDS). The notice for comment appeared in the January 30, 1980 Federal Register 45-21, pages 6793 through 6795.

Rulemaking or other deliberations can serve the industry and the public through improvements to the existing system for data collection and use. However, mandatory participation as proposed is viewed as an over reaction to the well recognized needs resulting from TMI-2. Previous studies into the role of the NRC could not justify mandatory participation by the industry and at this time our recommendation is for continuing voluntary participation. The NRC should continue as a participant and provide support as in the past.

Primarily NPRDS functions for product improvement through long-term failure statistics. This requires a major item inventory for the data base and most users recognize that improvements to the data base are necessary. New attention and agreement on how to strengthen the data base by manageable phases is needed at this time.

The industry as represented by INPO and NSAC are currently generating practical methods for screening and evaluating operating events for an early alert reporting mechanism. The mandatory Licensing Event Report (LER) already provides for identification of a component malfunction. Industry action should assure format and entry of each component case into NPRDS even if the utility is not currently participating in NPRDS. Westinghouse views NPRDS as a support to the early alert function but not as a primary vehicle for operating experience feedback.



Acknowledged by card. 4-9-80

L-4-1, Pt. 50

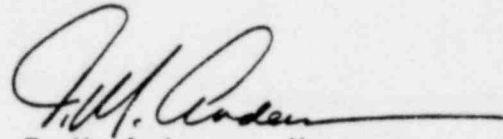
Mr. Samuel J. Chilk

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In summary, Westinghouse recommends continuation of voluntary participation in NPRDS and further recommends a review by cognizant agents and the public to focus on the steps by which the industry can improve the system.

Very truly yours,

A handwritten signature in black ink, appearing to read "T. M. Anderson", with a long horizontal flourish extending to the right.

T. M. Anderson, Manager
Nuclear Safety Department

RDB/bek