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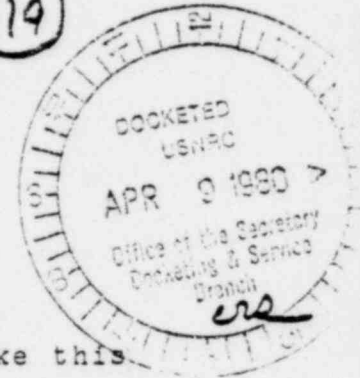
March 28, 1980

DOCKET NUMBER  
PROPOSED RULE **PR-50 (19)**  
**(45 FR 6793)**

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

Attention: Docketing and Service Branch

Dear Sir:



Louisiana Power & Light Company (LP&L) would like to take this opportunity to submit written comments to the Advance Notice of Rulemaking regarding the Nuclear Plant Reliability Data System (NPRDS), as published in the January 30, 1980 Federal Register/Vol. 45 No. 21/pages 6793 through 6795.

LP&L has for many years been actively participating in the development of the NPRDS and considers the intended action of the Commission to make NPRDS mandatory of vital interest. LP&L considers the Commission's action to be without cause and firmly opposes regulations making NPRDS mandatory. The utility industry has developed and supported NPRDS to improve data knowledge about equipment and system on nuclear plants, just as it has cooperated for years with the Edison Electric Institute Outage Data System for fossil plants. LP&L sees no benefit to the use of NPRDS as a regulatory arm of the NRC.

To summarize LP&L's view of items 1 through 9 of the proposed rulemaking ("Summary of Features Being Considered for Proposed Rule"), we consider that the Commission has blinded itself to its own "requirement that data gathering must be shown to be necessary, not merely useful or interesting," by not establishing guidelines for the scope of NPRDS reporting. Proposal number 6, the request that "the NPRDS Manual be upgraded to establish a standard reportable scope and instructions for consistent reporting" does not go as far as the ANSI N18-20 Subcommittee, which is currently addressing the issues of

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Samuel J. Chilk, Secretary

Page - 2

March 28, 1980

reportable scope and data usage through an Ad Hoc Task Force. LP&L, therefore, fails to understand how the Commission can consider making the NPRDS mandatory when it cannot identify what is necessary, not merely useful or interesting, for the creation of a standard and accurate data base.

LP&L also believes that the NRC must look at its charter to determine whether the concept of availability and reliability, from a technical standpoint, is not in conflict with statements in 10CFR addressing safety. These ideologies do not always agree. We refer you to the Navy Nuclear Program, where there is a fundamental difference in operations philosophy between a land-based prototype reactor that is shut down for any safety reason and a submarine several hundred feet under water, for which the reactor is the primary life support, and whose availability and reliability are primary reasons for keeping the reactor up and operating.

LP&L is of the opinion that data collection is but one aspect of the total safety reliability/availability/productivity picture, and we would seek the Commission's participation in developing a program to reduce duplication in LERS and NPRDS reporting. We also would be agreeable to helping the Commission make the LERS, which is already mandatory, a more meaningful tool for data collection, so that analyses might be provided from a reliability, availability, and safety aspect. From this point of view, we offer the following comments in response to the NRC's questions.

Question No. 1: How should NPRDS effort be apportioned between improving plant availability and improving plant safety? Where should the emphasis be?

Comment: This question points up a contradiction in the NRC's thinking regarding the use of reliability data generated by the

Samuel J. Chilk, Secretary

Page - 3

March 28, 1980

NPRDS. On the one hand, it is stated in summary item 9 that the NPRDS would provide equipment reliability data previously reported by the LER system so as to place primary emphasis on the NPRDS as a long-term predictor of component and plant availability. On the other hand, question number 1 asks how the NPRDS effort can not only supply reliability data for improving plant availability but also improve plant safety. The answer is that it cannot, since plant safety and plant availability are not always compatible goals.

With regard to how the NPRDS effort can be apportioned to improve plant availability, the following statement is offered. The ANSI N18-20 Subcommittee recognizes the importance of balance-of-plant (BOP) components to plant availability, and has considered expanding the initial one-time data base generated by utilities in order to "pedigree" BOP components. Nevertheless, the Subcommittee foresees economic payoffs simply by using the existing safety-related data base and transferring computerized data where it already exists in the utilities to the NPRDS.

Question No. 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?

Comment: A description of how NPRDS data can be used by industry, the public, and the NRC is best accomplished by describing the existing NPRDS program. Through ANSI N18-20 Subcommittee conferences, its membership, its associations with industry groups such as EEI and EPRI, yearly workshops, and quarterly and annual reports, all three sectors are served.

Question No. 3: How should NPRDS data be gathered and analyzed to facilitate recommended uses?

Samuel J. Chilk, Secretary

Page - 4

March 28, 1980

Comment: The existing data collection framework is appropriate except where further efforts are needed to improve effectiveness. See responses to questions 9 and 10.

Question No. 4: Who should alert appropriate persons concerning problems uncovered from analysis of NPRDS data? Who should initiate design, maintenance or operating improvements?

Comment: Alerts on significant events that need quick action will seldom, if ever, come from a data base analysis. The more likely items, such as weakness in design, relative performance of vendors' equipment, need for changes in test or surveillance schedules, etc., are longer term and should not be classified as alerts. At any rate, if the identified problem results from analyses by organizations such as NRC, INPO, EPRI, NSAC, or an MSSS vendor, that organization should take the lead in notifying the utilities, A/E's, NRC, etc.

Question No. 5: What systematic analysis is conducted currently by licensees? To what extent and for what purpose should each licensee be required to analyze data from its plant and from other similar plants?

Comment: A requirement already exists that each Licensee review operating experience at plants of similar design (TMI-2 Lessons Learned Task Force Report NUREG 05). NPRDS, through routine detailed output reports and the Special Report Writer capability (now being tested in a pilot program), can assist the utilities in this function by making historical engineering and failure data readily available. The program can serve as a useful tool in operational experience evaluation. But to require each Licensee to analyze the data would be needlessly duplicative, and, in fact, would be counter-productive; it would inhibit utilities from performing the non-routine, specialized types of analyses pertinent to particular situations and immediate

Samuel J. Chilk, Secretary

Page - 5

March 28, 1980

needs. This data analysis can be more effectively accomplished with an attendant feedback mechanism by utility-sponsored organizations.

Question No. 6: 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?

Comment: The management of NPRDS should not be dependent upon mandatory or voluntary consideration. The management should be based upon input from industry, government, and the utilities. The present makeup of the ANSI N18-20 Subcommittee is composed of these groups.

Question No. 7: To what extent, if any, should the NRC manage NPRDS reporting and data analysis?

Comment: As noted by the GAO, the NPRDS has been developed and operated primarily by industry for industry's benefit. Under the present management of NPRDS, NRC has representatives on the N18-20 Subcommittee. Management rather than representation by the NRC would inevitably result in a loss of flexibility and a growth of legal and political complications.

Question No. 8: If NPRDS reporting is mandatory, how should the NRC inspect and enforce mandatory license participation? Should licensees be subject to enforcement penalties for non-compliance with NPRDS requirements?

Comment: A requirement that all utilities participate in NPRDS does not necessitate a separate inspection and enforcement function at the utility level by the NRC. The degree and accuracy of reporting is readily available for review by the N18-20 Subcommittee (which has NRC representation) and the NRC staff through reports prepared by the NPRDS contractor. The NRC has sufficient regulation to ensure that nuclear safety concerns are properly reported. NPRDS is a long-term



Samuel J. Chilk, Secretary

Page - 6

March 28, 1980

statistical data base developed by the industry, and it is inappropriate to suggest or consider enforcement penalties. The NPRDS should not be used as a regulatory tool.

Question No. 9: What improvements should be made to the NPRDS Manual or other guiding vehicle to enhance uniformity of reportable scope, completeness and accuracy of reporting, and usability of the data?

Comment: As stated by the ANSI N18-20 Subcommittee, reporting of reliable data by utilities is dependent upon the utilities' confidence that the data is technically and economically valuable. Indeed, the NRC has recognized the "basic requirement that data gathering must be shown to be necessary, not merely useful or interesting." Given the 1978 commitment of the Subcommittee Task Force to review, clarify, define, and recommend rules and procedures for data reporting and maintenance, no further expansion of data gathering is necessary.

Question No. 10: Any data-gathering system needs feedback to maintain and upgrade system capability in the face of changing events, methodological advances, and other factors. Feedback is particularly necessary to modify data-gathering activity upon which the whole analytical system rests. What feedback features, if any, should be addressed by rulemaking?

Comment: A number of changes to the NPRDS procedures manual and reporting forms have been implemented since the system went into operation in July 1974, all as a result of feedback to the ANSI N18-20 Subcommittee. With the expected usage of the data base by NSAC, NRC, and INPO, additional valuable feedback will be expected as a matter of course.

Question No. 11: Should the NPRDS and LER systems be restructured to avoid overlapping data-gathering requirements or should present systems formats be retained.

Samuel J. Chilk, Secretary

Page - 7

March 28, 1980

Comment: LP&L supports the NRC's participation in developing a program that reduces duplication in both LER and NPRDS reporting.

Question No. 12: In the event you recommend eliminating duplication between LER and NPRDS reporting, how would you restructure each system's reporting requirement? Comment specifically on the idea 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?

Comment: See our response to question 11.

Question No. 13: Do you agree with the summary paragraph 2 estimate of a minimum of 3500 components as an appropriate scope? Assuming a reportable scope of 3500 components, how many NPRDS failure reports should be expected per month per operating plant?

Comment: A scope of 3500 components is not a reasonable estimate; rather, an average of 6000 components, based on a standardized scope for reporting, is suggested.

In addition, the number of failures per month in a plant is so small that a meaningful average could only be established over a number of years, especially with the effects of higher failure reporting during surveillance periods. Projections based on failures/month are not a sound basis for evaluation.

Question No. 14: Should the scope of systems and components presently summarized by the NPRDS be expanded or contracted and, if so, what areas?

Comment: Some change in the scope of reporting to NPRDS is expected as a result of the ANSI N18-20 Subcommittee efforts described in the response to question 9. The resulting change in the NPRDS scope is

Samuel J. Chilk, Secretary

Page - 8

March 28, 1980

expected to be fairly minor, however, since existing data collecting systems adequately cover those systems and components outside the scope of NPRDS.

Question No. 15: Does the cost of preparing and submitting failure reports differ between the LER and NPRDS systems? What do you estimate these costs to be?

Comment: The response to this question should come from utilities with actual experience in preparing and submitting reports for the LER system and NPRDS. Louisiana Power & Light at this time does not have any operating nuclear power plants.

Question No. 16: Are the per plant figures of \$75,000 to \$200,000 for one time development of NPRDS engineering data and \$50,000 for annual NPRDS reporting considered valid or are these figures understated or overstated?

Comment: See our comment on question 15.

Question No. 17: What alternatives to mandatory reporting would provide the data necessary for complete and accurate reliability analyses and at what level of assurance?

Comment: As stated in our response to question 1, LP&L believes that fuller use of the existing NPRDS data base is a more practical alternative than expansion of the data by way of mandatory participation in the system. Attention to defining the scope and methods of reporting is the crucial issue upon which accuracy relies, and this will not be accomplished simply by accumulating a maximum amount of data.

Question No. 13: Do the benefits to the utility and the public of improved availability and increased reactor safety warrant the cost of



Samuel J. Chilk, Secretary

Page - 9

March 28, 1980

"NPRDS or is there a less costly way to realize equivalent benefits in regulatory action?

Comment: As addressed in Comment 1, the NPRDS effort is, and should continue to be, directed at improving nuclear plant reliability. It is our best judgement that this system has a positive cost-benefit ratio although it is not possible to determine the exact value. The utilities have spent considerable time, effort, and money to support this system. Making the NPRDS mandatory may increase its benefits, but will certainly increase its cost.

Question No. 19: How should the NPRDS be funded? Should industry fund fully or should the NRC contribute funds to support the industry system?

Comment: NPRDS funding should continue to come primarily from the utilities, but partial funding from the NRC, in recognition of their participation and use of the program, is appropriate.

Question No. 20: Should the six early design plants, excluded when the NPRDS commenced, continue to be excluded or should all plants be required to participate?

Comment: The opinion of LP&L is that the data from all plants would be valuable.

Question No. 21: Certain operator errors must now be reported within the scope of the LER system. Furthermore, NPRDS reports sometimes include corresponding human error information. To what extent, if any, should an improved NPRDS collect man-machine interface data and perform reliability analyses which consider human factors?

Comment: LP&L concurs with the ANSI N18-20 Subcommittee that human errors which do not result in a system or component failure belong in a separate human factors engineering reliability data base. Human er-

Samuel J. Chilk, Secretary

Page - 10

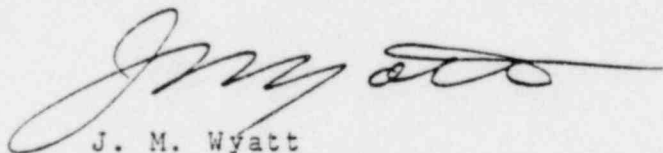
March 28, 1980

rors resulting in loss of safety-related functions should be recorded in the data base.

SUMMARY

The foregoing responses to the NRC's proposed rulemaking are offered in the sincere hope that mandatory participation in the NPRDS will not be imposed. LP&L believes strongly that in view of the additional industry cost, limited expected safety benefits, and duplication of the LER system, little justification exists for altering the management of the NPRDS or its development.

Sincerely yours,



J. M. Wyatt

Chief Executive Officer

Louisiana Power & Light

cc: M.S. Medeiros, Jr.,  
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