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March 27, 1980

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

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PROPOSED RULE PR-50

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(45 FR 6793)

Dear Mr. Chilk:

Subject: Advanced Notice of Rulemaking published in the Federal Register, January 30, 1980, entitled "Domestic Licensing of Production and Utilization Facilities; Operational Data Gathering".

I have reviewed the subject rulemaking and am taking this opportunity, as a citizen of the United States, to file comments on the role of the U. S. Nuclear Regulatory Commission regarding the Nuclear Plant Reliability Data System.

I have been involved in the NPRDS program since 1976 and presently manage the reporting to the program for three operating nuclear units. I have served on the ANSI N18:20 Subcommittee since March of 1979, and on the N18:20 Task Force since October of 1978. I have in the past, and I continue to be actively involved in the program, in the annual workshops, and in projects which help foster NPRDS data usage.

I emphasize that I am not writing on behalf of my employer, or the N18:20, but as a citizen of the United States, and that my comments are not necessarily shared by either my employer or the Subcommittee.

I am very concerned about the attitude which the U.S.N.R.C. has taken towards the NPRDS program. It was recognized at the onset that the program was being developed as an industry managed and supported project (joint government, utility and supplier), with the primary objective being long term reliability improvement of nuclear safety related components and systems. While the system is capable of producing other shorter term benefits (and these are being pursued) the original objectives are sound and remain unchanged. However desirable it may be, full utility participation is not necessary to realize these benefits.

A most important aspect of this program is to continue to have the various segments of industry actively involved to ensure that the program adequately addresses industry needs. The intent of the NRC to make mandatory this voluntary reporting system points to a NRC disregard for cooperative industry efforts. It will further serve to undermine the objectives of the program through future tailoring of the program to the specific needs of the NRC. The present Licensee Event Reporting system suffers from such a chronic illness.

Acknowledged by card. 4-9-80



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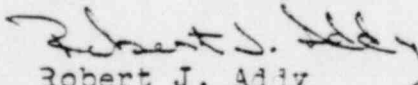
What the program does need is positive reinforcement; the reinforcement attendant with successful utilization of the data, not the negative reinforcement inherent with mandatory controls. The increased awareness for data analysis and utilization within the industry, as evidenced by the newly formed Institute of Nuclear Power Operations, the Nuclear Safety Analysis Center and the NRC Office for Analysis and Evaluation of Operational Data, may provide such an incentive as a reality.

I recognize that the NRC has a genuine need for a comprehensive reliability data system - the LER system does not provide this information. But the LER system does provide (along with 10 cfr 21 requirements) the information necessary to identify immediate nuclear safety concerns, which is of foremost importance. The NPRD program on the other hand, being a statistical data base, does not address immediate safety concerns, but rather, is intended to improve reliability over the long term. The need for mandatory participation in such a system has not been sufficiently justified by the NRC; as such, and because the costs are borne primarily by the utilities, the choice to participate is a freedom which should remain with the individual utilities.

As a note, I am also concerned about the apparent lack of forthright to the public which the NRC displayed in preparing the subject rulemaking. In particular, in 1977 the NRC established a working group which reviewed the NPRD program and later recommended significant changes, some of which are not consistent with the original intent of the program. No mention of this report was made in the rulemaking - which leads one to question the NRC's underlying intent with mandatory participation.

Improvements can be made to the NPRDS program to allow the system to serve different masters, but it will take a coordinated industry effort, and some compromise among the various segments, to effect a successful program.

Very Truly Yours,

  
Robert J. Adly