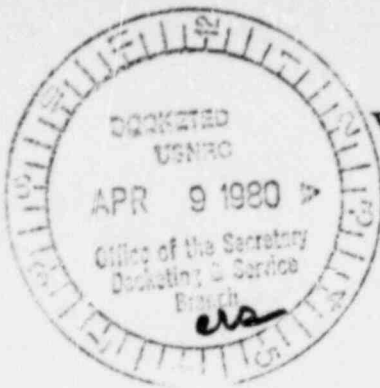


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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

March 28, 1980

DOCKET NUMBER
PROPOSED RULE PR-50 (20)
(45 FR 6793)

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D.C. 20555

Serial No: 282
PO/DLB: jh

Dear Sir:

Subject: Proposed Rulemaking Regarding
Participation in the Nuclear
Plan Reliability Data System (NPRDS)

The following comments are submitted in response to the Advanced Notice of Rulemaking regarding participation in the Nuclear Plant Reliability Data System (NPRDS) as published in the January 30, 1980 Federal Register pages 6793 through 6795.

We agree with the recommendation of the Presidents' Commission on the Accident at Three Mile Island that there be a program for the systematic assessment of experience in operating reactors. Accordingly, we have expanded and systematised our review of industry operating experiences and we fully support the formation of the NRC's Office for Analysis and Evaluation of Operational Data. However, we do not agree with your conclusions that mandatory participation in NPRDS would improve the assessment of operating experiences. The existing data base available for evaluation including LERs, and routine operating reports, is substantial. We believe the first priority in improving the evaluation of operating experience should be in improving the evaluation itself rather than in simply increasing the data base. In fact, operating experience assessment might be improved by revising the existing LER system to eliminate the large number of reports of questionable significance.

We agree with the conclusion of the GAO as stated in the Advance Notice "that it was unlikely the NRC could justify mandatory NPRDS participation when factors such as additional industry costs, limited expected safety benefits, and duplication of the NRC's LER system were considered". We feel that the intent of the GAO conclusion is being subverted by the NRC's intent to make participation mandatory unless comments received provide sufficient reasons to the contrary. In view of the substantial additional legal, inspection, and enforcement expenses which would result from the inclusion of NPRDS in the regulatory process, we believe a substantial benefit must be demonstrated. We do not believe this benefit has been demonstrated.

Very truly yours,

L-4-1 PR-50

Acknowledged by card. 4-9-80

C. M. Stallings
Vice President-Power Supply
and Production Operations