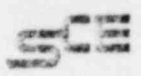


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DOCKET NUMBER
PROPOSED RULE PR-50 (30)
(45 FR 6793)

Secretary of the Commission
Attention: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Gentlemen:

Subject: Docket Nos. 50-206, 50-361 and 50-362
Comments on Proposed Rulemaking
Mandatory Participation in NPRDS
San Onofre Nuclear Generating Station
Units 1, 2 and 3



As published in the Federal Register on January 30, 1980, written comments were requested in response to the Advance Notice of Rulemaking regarding the proposal to make utility participation mandatory in the Nuclear Plant Reliability Data System (NRPDS). The purpose of this letter is to submit our comments in response to that request.

It should be noted that we are strongly opposed to the proposed regulations making participation in NRPDS mandatory. The additional effort which will be required of all parties involved will not result in commensurate improvements in the benefits to be derived by the increased data collection. Instituting the NRPDS as a part of the regulatory process would provide a considerable duplication in effort since the Licensee Event Report (LER) system is already operational within the regulatory process and in our view provides the necessary information which the NRC can use as a data base.

From its inception, the NRPDS has been an industry developed and supported data system whose objective is to provide reliability or failure statistics on the safety-related components and systems of nuclear power plants. Previous studies which investigated the possibility of changing this original objective, and to make the reporting mandatory, have recommended that the system remain voluntary (ACRS letter from S. Lawroski to L. V. Gossick dated July 11, 1978)

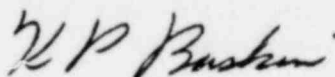
L-4-14-50

Acknowledged by 4-9-80

The Advance Notice requests "advice and recommendations" in several specific areas to assist in the development of a proposed rule to implement the requirements for mandatory participation in NRPDS. As discussed above, we are strongly opposed to the development and implementation of regulations in this area; therefore, such "advice and recommendations" are not considered appropriate.

We hope that these comments will provide the NRC with the needed input to determine a course of action with regard to the proposed rule.

Sincerely,



cc: M. S. Medeiros, Jr. (NRC)