

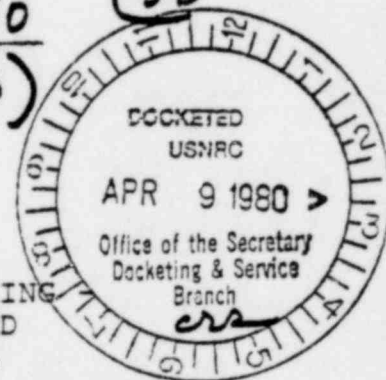
THE CINCINNATI GAS & ELECTRIC COMPANY

March 28, 1980

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

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Attention: Docketing and Service Branch

RE: ADVANCED NOTICE OF PROPOSED RULEMAKING
DOMESTIC LICENSING OF PRODUCTION AND
UTILIZATION FACILITIES; OPERATIONAL
DATA GATHERING (45 FR 216793)

Gentlemen:

With respect to the subject Federal Register Notice of January 30, 1980, The Cincinnati Gas & Electric Company submits the following comments on behalf of itself and as agent for The Dayton Power and Light Company and Columbus and Southern Ohio Electric Company. Our comments are organized to address several of the 21 questions which were posed by the Advanced Notice of Proposed Rulemaking.

Question 1

How should NPRDS effort be apportioned between improving plant availability and improving plant safety? Where should the emphasis be?

Response

NPRDS was developed to provide the nuclear industry with meaningful, long-term failure statistics and qualitative data on systems and components important to nuclear safety. The functions and objectives of NPRDS are set forth in ANSI N524-1976. The functions set forth in this document should remain as is and the emphasis should be placed upon the safety related functions of nuclear systems and components.

Question 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?

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Acknowledged by card... 4-9-80

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Response

The NPRDS data should be used by the industry for such things as improvement of component and system reliability, optimizing surveillance and test schedules, optimizing designs, identifying failure trends and wear out patterns, providing manufacturers with field performance data on their products, identifying spare parts needs, and probabilistic analysis of various postulated accident sequences. The NPRDS data should be used by the NRC for probabilistic analysis of various postulated accident sequences, optimizing surveillance and test requirements, and identifying failure trends.

Question 3

How should NPRDS data be gathered and analyzed to facilitate recommended uses?

Response

The existing method for gathering and analyzing NPRDS data is adequate. In addition, a newly established Institute of Nuclear Power Operations (INPO) and Nuclear Safety Analysis Center (NSAC) will facilitate the existing system. These utility sponsored organizations will utilize the NPRDS data (as well as other applicable data sources) in their ongoing studies related to equipment design and reliability.

Question 4

Who should alert appropriate persons concerning problems uncovered from analysis of NPRDS data? Who should initiate design, maintenance, or operating improvements?

Response

In that the data gathered under the NPRDS system is presently and will continue to be utilized by a number of organizations such as NRC, INPO, EPRI, NSAC, or an NSSS vendor, etc., that organization which may identify problems in the analysis of this data should take the lead in notifying utilities, A/E's, or other appropriate organizations. In addition, NSAC and INPO have put in place a Significant Event Evaluation and Information Network (SEEIN) to disseminate the results of a comprehensive analysis of all sources of operational data including the NPRDS.

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Question 5

What systematic analysis is conducted currently by licensees and the public? To what extent and for what purpose should each licensee, the NRC and the public analyze data?

Response

TMI-2 Lessons Learned Task Force Report requires that each licensee review operating experience at plants of similar design. While NPRDS can assist the utilities in this function by making historical engineering and failure data readily available, requiring each licensee to analyze the data would be unnecessarily duplicative and in fact would be counterproductive. It would inhibit utilities from performing the non-routine, specialized types of analysis pertinent to particular situations and immediate needs. The data analysis can be more effectively accomplished through the above mentioned utility sponsored organizations such as INPO and NSAC and by the NRC Office of Analysis and Evaluation Operational Data.

Question 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?

Response

Meaningful and responsive reporting is being accomplished under the present management.

Question 7

To what extent, if any, should the NRC manage NPRDS reporting and data analysis?

Response

NPRDS has been developed and operated primarily by industry for industry's benefit. Management of the system by NRC would inherently force NPRDS into the regulatory arena with the associated loss of flexibility and additional complications of legal and political impact.

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Question 8

If NPRDS reporting is made mandatory, how should the NRC inspect and enforce mandatory licensee participation? Should licensees be subject to enforcement penalties for noncompliance with NPRDS requirements?

Response

The NRC has sufficient regulation through technical specifications and 10CFR21 requirements to assure that nuclear safety concerns are properly reported. It is inappropriate to suggest or consider enforcement penalties for NPRDS non-compliance.

Question 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?

Response

The Reporting Procedures Manual for NPRDS is continually upgraded to reflect recent industry experienced.

Question 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?

Response

The present feedback features inherent to the NPRDS system are adequate. In addition, the introduction of NSAC and INPO will serve to facilitate the existing feedback mechanism. We see no need for this subject to be addressed by rulemaking.

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Question 11

Should the NPRDS and LER systems be restructured to avoid overlapping data-gathering requirements or should present system formats be retained?

Response

NPRDS and LER functions are independent. Restructuring should be limited to satisfying the intent of the LER system and should not be tied to NPRDS.

Question 12

In the event you recommend eliminating duplication between LER and NPRDS reporting, how would you restructure each system's reporting requirements? 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?

Response

See response to Question 11.

Question 17

What alternatives to mandatory reporting would provide the data necessary for complete and accurate reliability analyses and at what level of assurance?

Response

Obtaining the data necessary for complete and accurate reliability analysis is, of course, important. However, the disadvantages of introducing the NPRDS system into the regulatory process with the associated legal, political, inspection, and enforcement activities far outweigh any significant increase in the already increasing industry participation. In addition, the expected usage of NPRDS data by NRC, NSAC, and INPO will further increase response from utilities and further improve the already adequate NPRDS system without any of the disadvantages mentioned above.

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Question 19

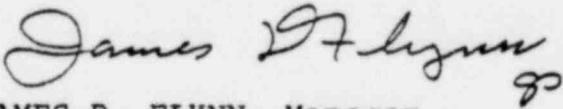
How should the NPRDS be funded? Should industry fund fully or should the NRC contribute funds to support the industry system?

Response

Partial funding from NRC for NPRDS is appropriate in recognition of their participation and use of the program.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
JAMES D. FLYNN, Manager
Licensing and Environmental Affairs

GCF:dew