

PP&L

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PROPOSED RULE

PR-50

(33)

(45 FR 6793)

March 28, 1980

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

Attention: Docketing and Services Branch
 Re: PR 10CFR50 - Operational Data Gathering

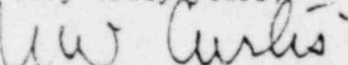
In reference to the Advanced Notice of Proposed Rulemaking directed at requiring mandatory participation in the Nuclear Plant Reliability Data System (NPRDS) by power reactor licensees, PP&L offers the following comments.

PP&L intends to participate voluntarily in the NPRDS program. This decision to participate in the program was made independently of the NRC proposed rulemaking and indicates that the company fully intends to participate in the program whether or not mandatory participation is required by the NRC.

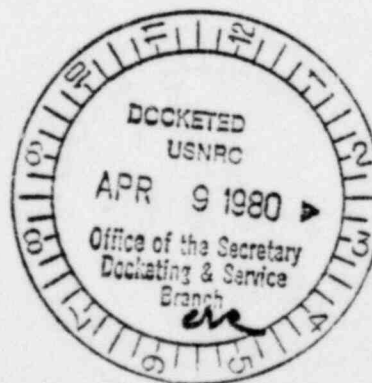
At present, the NPRDS data collection is not adequate to meet industry needs. The industry in coordination with EPRI is actively involved in the development of a National Data System which will be a significant improvement over all currently used data collection systems. Mandatory participation in the NPRDS system will most likely undermine efforts in this area since resources will be diverted to meet any additional NPRDS requirements as a result of the rulemaking.

In addition, the ANSI 18-20 Subcommittee of the Edison Electric Institute and the EPRI E&O Task Force have responded to the NRC proposed rulemaking and have affirmed the desire to keep NPRDS voluntary. PP&L concurs with the responses of the above groups to the questions contained in the NRC proposed rulemaking.

Very truly yours,



N. W. Curtis
 Vice President - Engineering & Construction



L-4-1 PL.50

Acknowledged by card. 4-9-80