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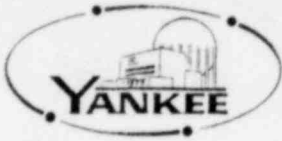
Telephone 617 366-9011

TWX
710-390-0739

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YANKEE ATOMIC ELECTRIC COMPANY



20 Turnpike Road Westborough, Massachusetts 01581

April 15, 1980

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

Attention: Docketing and Service Branch

Subject: Mandatory Participation in NPRDS - Advance Notice of Rulemaking
(45FR6793-1/30/80)

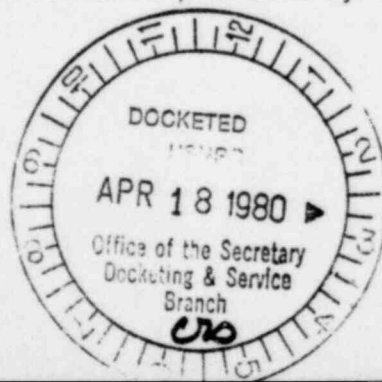
Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the Nuclear Regulatory Commission's advance notice of rulemaking to consider mandatory participation in Nuclear Plant Reliability Data System (NPRDS). Yankee Atomic owns and operates a nuclear power generating plant in Rowe, Massachusetts. The Yankee Nuclear Services Division (YNSD) also provides engineering services for other Nuclear Power Plants in the Northeast including Vermont Yankee, Maine Yankee, and Seabrook 1 and 2.

Yankee Atomic agrees that the six early-design operating plants (including Yankee Rowe) should be excluded from mandatory participation in NPRDS because of limited benefits to other plants due to equipment differences from the older plants.

The NRC's Licensee Event Report (LER) system should be improved. Thirty-day LER's for certain types of equipment or component failures should be deleted since they are not really of safety significance. Also, 2 categories of LER's could be considered: (1) significant events supported with a detailed description and (2) routine failures with a one page quick summary to fulfill NRC's data needs.

NPRDS should remain voluntary since mandatory participation would not add sufficient information to existing data systems to justify the disadvantages associated with mandatory participation. The disadvantages were described by the ANSI N18-20 Subcommittee in their letter to you dated February 26, 1980. We endorse these comments provided by the Subcommittee.



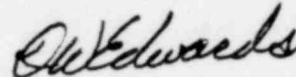
Acknowledged by card. 4-18-80

Yankee Atomic agrees that industry should continue to improve NPRDS and the use of its data to assure improvements in design, construction and operation. However, mandatory participation will not accomplish these improvements and may even be counter productive.

Should you have any questions with regard to our comments, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



D. W. Edwards
Director of Operational Projects

JHM/dis