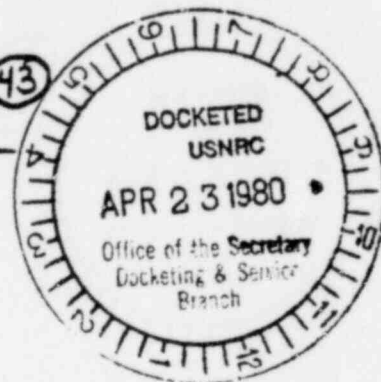


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April 16, 1980

DOCKET NUMBER PR-50 (43)
PROPOSED RULE (45 FR 6793)



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

Attention: Docketing and Service Branch

Dear Sir:

In the Federal Register notice of January 30, 1980 (45 FR 6793) the NRC requested comments on their advance notice of proposed rulemaking regarding the Nuclear Plant Reliability Data System (NPRDS).

The Atomic Industrial Forum's Committee on Power Plant Design, Construction and Operation is aware of the limitations and deficiencies of the NPRDS and concurs in industry's ongoing programs to upgrade NPRDS and other data gathering and analysis systems. However, it believes that making the NPRDS mandatory will not improve reactor safety.

The NRC's justification for mandatory participation in NPRDS is that it would provide a more comprehensive and complete data base for evaluating reliability and for early identification of failure trends. However, page 21 of the Report of the President's Commission on the Accident at Three Mile Island notes: "NRC accumulates vast amounts of information on the operating experience of plants. However, prior to the accident there was no systematic method of evaluating these experiences and no systematic attempt to look for patterns that could serve as a warning of a basic problem." Thus, better evaluation of data from existing systems appears to be the major problem.

We believe the recent steps taken by the industry will provide that better evaluation. The Nuclear Safety Analysis Center (NSAC) and the Institute of Nuclear Power Operations (INPO) will use the data in the NPRDS. With respect to better evaluation by industry, NSAC is the data base manager, performs screening studies and alerts, and in-depth studies of selected events. It is committed to identification and evaluation of generic safety issues and potential solutions. INPO is committed to the collection of related information from various sources, the identification and evaluation of operations problems, the coordination of data base and event evaluations, and the conduct of associated analyses including human factors studies. Both organizations are to feed back to the industry information that can be used to improve the safety and

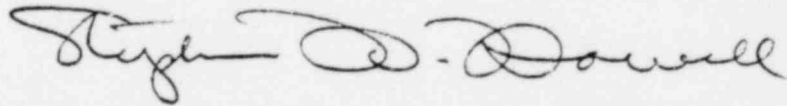
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reliability of nuclear power plants. The intent is to provide an anticipatory alert to industry on generic safety problems and to establish a basis for planning long range improvements to overall plant operations.

In conclusion we do not believe that the NPRDS should be a mandatory requirement. We recommend that the NRC be an equal participant in and user of the system. Our position is that the NRC's desires will be met by industry initiatives and that prior to levying an additional regulation on industry, the NRC should observe the operation of the upgraded industry and NRC analysis and evaluation programs.

Sincerely,

A handwritten signature in cursive script, reading "Stephen H. Howell".

STEPHEN H. HOWELL, Chairman
Committee on Power Plant Design,
Construction and Operation

ACB:mgh