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PROPOSED RULE PR-50
(46 FR 3541)

March 11, 1981



Mr. Eric W. Weiss
Office of Standards Development
U. S. Regulatory Commission
Washington, D. C. 20555

Dear Mr. Weiss:

Admiral Wilkinson, President of the Institute of Nuclear Power Operations recently called to my attention the need to comment on the announcement in the Federal Register, regarding the proposed IOER system. He also sent me a copy of Mr. Robert L. Haueter's, (Chairman, ANS 58-20 subcommittee), letter to the NRC.

After reviewing SECY-80-507 and Mr. Haueter's letter, I believe that the NRC should move cautiously on this new program, if at all. As an alternative, I would hope the features of the program could be added in the NPRDS program with universal participation by all utilities.

Our industry is over burdened by new requirements that require greater and greater manpower. Manpower shortages are developing in many areas. It is important that the NRC carefully select the high priority programs they require and refrain from introducing any programs that may give us only marginal improvements.

I noticed that the new program would involve a renumbering of plant components. For an existing plant this can be a monumental undertaking and one that if not carefully done, could lead to serious confusion by the plant staff. We understand the advantage of a universal numbering system and have even considered it for all Detroit Edison power plants sometime ago, but because of the large effort required and potential for confusion, we hesitated to carry out the project. If the NRC should go forward with IOER program, I strongly suggest that only plants that do not have a construction permit be included in the revised numbering system.

Sincerely,

Rayne H. Jens

WHJ/taj
VPNO-81-55

cc: Admiral Wilkinson

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