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3 February 1981

Office of Standards Development
U.S. Nuclear Regulatory Commission
Washington, DC 20555



JUCKEY THURSDEN
PROPOSED RULE **PR 50**
46 FR 3541

Attention: Mr. Eric W. Weiss

Subject: 10CFR, Part 50 Optional Data Gathering

Advance Notice of Proposed Rulemaking as Published in
The Federal Register, Vol. 46, No. 10, Thursday,
15 January 1981, pp. 3541 - 3543



Gentlemen:

The proposed rulemaking relative to the development of the Integrated Operational Experience Reporting (IOER) System is intended to improve the current LER and NPRD's reporting programs.

I have no comment to make on the reporting system itself; however, I am concerned with the distribution of the data. As a manufacturer of products which are applied in nuclear facilities, in addition to having some direct responsibility for the products that are used in such applications, I would find it most beneficial no matter what reporting system is used if such information were available to the manufacturer whose product is involved.

We have tracked the LER reports for some time and have discovered problems of which we were unaware, or have found situations where the problem reporting suggested a product problem when it was, in fact, an operational one. Even these reports reached us up to six months after a problem situation had been detected. We would be most interested in receiving such information as soon as practicable. I hope a provision of this rulemaking (whatever information reporting system finally evolves) will include timely distribution of information to the manufacturer whose product is involved.

Very truly yours,

THE FOXBORO COMPANY

W Calder
William Calder, Manager
Corporate Quality Assurance

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cc: J.C. Childs, Dept. 367
E.J. Laderoute, Dept. 367
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