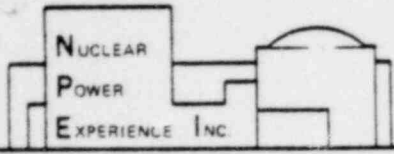


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DOCKET NUMBER PR 50
PROPOSED RULE 45 FR 3541

February 5, 1981

Secretary of the Commission
Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing & Service Branch

Gentlemen:



I have been following the NRC's plans to improve the operating experience reporting effort (LERs, NPRDS and the new IOER system). We have been using the existing systems since they were first initiated and are quite familiar with their many shortcomings. As a result of the latest notice in Volume 7, No. 2 of the NRC News Releases, I would like to make a few suggestions:

1. Ensure that all future reports are made available to the public via the Public Document Room. I do not believe that NPRDS reports are filed in the PDR and you are planning to eliminate LER reporting of "most component failures and malfunctions now covered by the NPRDS".
2. Ensure that every report include the model number, type and any other pertinent nameplate typedata of the component that failed. Present day LERs are required to include only the manufacturer's name. When such sparse information is passed on down to a person (i.e., maintenance engineer, maintenance supervisor, instrument man, designer, etc.) who can actually take action to prevent similar failures, it is almost useless.
3. Strive to simplify or clarify the reporting procedures. We see dozens of mistakes on LERs every month. There are so many mistakes that I would question the thoroughness and accuracy of computer searches through the existing data base.

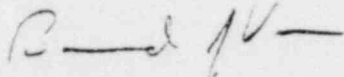
Approved by *[Signature]*

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4. Improve the follow-up reporting requirements. Quite often the complete story cannot be provided in a report because investigations are continuing. Many times plants neglect to send in revised reports once those investigations are completed. We have a report storage system that "waits for" that additional information. That storage is cleaned out about every two years and you would be surprised how many incidents are open-ended even after two years have passed.
5. Even out the reporting requirements between plants. It's absolutely ludicrous that Sequoyah 1 can be reporting LER 80-204 during the same month that Ginna is reporting 80-11. Reports on instrumentation drifts, missed tests, minor fish kills, minor packing leaks, high river or lake temperatures, fallout from Chinese bomb tests, etc. do nothing but clutter up the reporting system and make it unmanageable.

I would be most happy to discuss my ideas with someone from your organization if you so desire. We have been attempting to disseminate information on operating problems for nine years now and are keenly interested in seeing improvements made. We feel that all interested parties in the nuclear industry should be working together towards such improvements.

Sincerely,



Bernard J. Verna
Consultant

cc: J. Franks
W. Lavalley