

MIDDLE SOUTH SERVICES, INC./BOX 61000/NEW ORLEANS, LA. 70161/(504) 529-5262

D. CLARK GIBBS-VICE PRESIDENT
NUCLEAR ACTIVITIES

November 17, 1981

(5)

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

DOCKET NUMBER
PROPOSED RULE **PR-50**
(46 FR 49134)

ATTN: Docketing and Service Branch

SUBJECT: Integrated Operational Experience Reporting System
(IOERS)

DOCKETED
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U.S. NUCLEAR REGULATORY
COMMISSION
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Gentlemen:

Federal Register 49134, Volume 46, No. 193, dated October 2, 1981, invited comments on the scope and content of Licensee Event Reporting requirements in light of anticipated improvements in the Nuclear Plant Reliability Data System (NPRDS). Middle South Services, Inc., on behalf of itself and the other entities of the Middle South Utilities System, hereby responds to the request.

We support the proposal to defer IOERS rulemaking and rely on INPO activities regarding NPRDS. A utility's participation in NPRDS as an INPO evaluation parameter during audit activities should increase the level of utility participation and quality and quantity of NPRDS data. With respect to LER reporting requirements, we would prefer to withhold comment until a specific proposal is released for comment. It is suggested that INPO be consulted in preparation of the proposed rule, and that the opportunity to comment on same be provided via a future Federal Register notice. However, any increase in LER reporting requirements should be restricted to those areas where a legitimate need for additional information exists.

Thank you for the opportunity to comment on this matter.

Sincerely,

T. & Schuch
for D.C. Gibbs

DS/D
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cc: Mr. F. G. Smith
Dr. K. R. Iyengar
File: 041-01

Acknowledged by card. 11/24/81 emp