nity w/ maihe some. Helternes Des. 3/6, 10: =

INPO INSTITUTE OF NUCLEAR POWER OPERATIONS 1820 Water Place Atlanta, GA 30339 (404) 953-3600 Eebruary 13, 1981

PERSONAL & PRIVATE

Mr. W. Z. Dircks Executive Director for Operations U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Bill:

As you know, INPO was established by the nuclear power utilities to strengthen the degree of safety in the operaitons of domestic nuclear power plants. One of our significant activities is the review of LERs for feedback to the utilities of lessons learned in plant operations.

From my viewpoint, the present LER system, and the proposed IOER system, are not completely satisfactory in highlighting human errors. In another field, the national aviation system, the non-punitive Aviation Safety Reporting System (ASRS), has been successful in uncovering human errors. I understand that about 85 per cent of all ASRS reports are directly attributable to human error.

We want to explore the adaptability of a system like ASRS to the nuclear community, but recognize that an NRC regulation exempting such reporting from punitive enforcement action may be required. Therefore, I want to solicit your preliminary comments on the potential for such an exemption before we proceed to expend effort on trying to work out such a system. I will call you soon to discuss what further steps we might take in exploring this matter.

Sincerely,

E. P. Wilkinson President

adw

8504220110 840731 PDR FDIA TOTTEN84-44 PDR

00568