

Institute of Nuclear Power Operations

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December 5, 1986

Mr. Victor Stello
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stello:

We recently received a copy of a letter dated November 14, 1986, from the Office for Analysis and Evaluation of Operational Data to the manager, Idaho Operations Office reference "NPRDS Trends and Patterns Program Assistance - FIN D1364". This letter is establishing a contract for a third party review of NPRDS.

We have expressed our concern in the past with the semi-annual evaluations of the NPRDS program using a contractor, indicating this to be inconsistent with the INPO Institutional Plan (Appendix B regarding INPO relationship with NRC) and the NRC October 1984 EDO memo to Office Directors and Regional Administrators that stated:

"... we should use NRC staff to evaluate INPO programs and not contractors."

We further requested in our October 22, 1985 letter to Bill Dircks, that this semi-annual audit by contractors be discontinued. We are concerned that this practice is continuing.

As you are aware, the NPRDS program has improved over the years since 1982, and is a powerful tool for the industry and the NRC. Utilities have met their commitment to improve NPRDS system participation and are evaluated on their performance in that subject area as part of the regular INPO plant evaluation program.

If you disagree with our assessment, we would like to discuss further the need to continue NPRDS evaluations. In any event, we remain strongly opposed to use of contractors in evaluating INPO programs.

Sincerely,

William F. Conyay Group Vice President

Bill Conway

Industry and Government Relations

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