

WOLF CREEK

NUCLEAR OPERATING CORPORATION

October 3, 1994

Neil S. "Buzz" Carns
Chairman, President and
Chief Executive Officer

WM 94-0155

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Reference: NRC Administrative Letter 94-11, dated
September 7, 1994

Subject: Request for Voluntary Comment on the Pilot
Program for NRC Recognition of Good
Performance by Nuclear Power Plants

Gentlemen:

The Reference requested industry comments on the pilot program for NRC recognition of good performance by nuclear power plants. The pilot program was instituted in August 1990 and first used by NRC senior management in June 1991. Its stated purpose was to provide the NRC with a vehicle to recognize "good performance" by nuclear power plants and, thereby, to provide positive reinforcement to licensees who had demonstrated such "outstanding safety performance in the industry" (SECY 94-071, dated March 18, 1994).

Wolf Creek Nuclear Operating Corporation (WCNOC) fully supports the position of the Nuclear Energy Institute that the NRC's good performance recognition program, which is not based on compliance with regulations, is inappropriate and should be discontinued. We do not believe this program contributes significantly to nuclear plant safety, but has the potential of arbitrarily affecting financial standing. We are also concerned that the term "good performer" taints those plants not so designated as less than good performers. This results in the vast majority of plants in the industry receiving an undeserved negative public image.

WCNOC appreciates the opportunity to comment on this issue. If you have any questions concerning these comments, please contact me at (316) 364-8831, extension 4000, or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Neil S. Carns

NSC/jad

cc: L. J. Callan (NRC)
D. D. Chamberlain (NRC)
J. F. Ringwald (NRC)
J. C. Stone (NRC)

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