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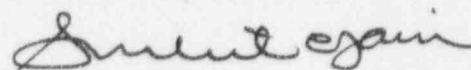
Desk Officer
Office of Information and Regulatory Affairs
NEOB-10202 (3150-0011)
Office of Management and Budget
Washington, DC 20503

**Subject: OMB Supporting Statement for Reporting
Reliability and Availability Information for Risk-
Significant Systems and Equipment, Proposed Rule**

Duquesne Light Company (DLC) is responsible for the operation of Beaver Valley Power Station Units 1 and 2. DLC has reviewed the supporting statement provided by the Nuclear Regulatory Commission (NRC) to the Office of Management and Budget (OMB) on the above referenced proposed rule and hereby submits the attached comments.

Thank you for the opportunity to comment on this issue. If you have any questions on this submittal, please contact Mr. R. G. Williams, Supervisor, Surveillance and Assessment, (412) 393-7554.

Sincerely,



Sushil C. Jain

c: Information and Records Management Branch (T-6F33)
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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ATTACHMENT

DLC Comments on OMB Supporting Statement

1. The burden estimates made in the Office of Management and Budget (OMB) Supporting Statement are dependent on the following assumption made on page 3-2 of the Draft Regulatory Analysis:

"For the purpose of this regulatory analysis, it was assumed that 80 plants would already be collecting similar data and 30 would not."

Duquesne Light Company (DLC) believes that the Nuclear Regulatory Commission (NRC) may be overestimating the availability and reliability data that utilities are collecting in support of the Maintenance Rule. While 80, or more, of 110 plants are collecting various forms of availability and reliability data, it is believed that the data is primarily failure oriented, not success oriented as is the information requested by the proposed rule. DLC believes that few plants are planning to collect data similar to that requested by the proposed rule.

If the quoted assumption is inaccurate, then the burden estimates for implementation in the "Recordkeeping Burden Table" would be underestimated.

2. The implementation burden estimate of 175 hours to "Develop data collection program" also does not seem to be realistic considering that program development will also include: review of the proposed rule, review of a new Regulatory Guide, possible review of a new Nuclear Energy Institute (NEI) guideline and development or revision of administrative procedures to implement the new regulation.
3. Page 3-10 of the Draft Regulatory Analysis indicates the NRC expense for conducting "about two workshops" on proposed rule implementation. The burden estimates apparently do not include the utility expenses that would be incurred in supporting these workshops.
4. The Recordkeeping Burden Table indicates a significant "Annual (recurring)" burden estimate difference between the 80 plants and the 30 plants. DLC questions why a burden difference should exist on a recurring basis once all plants have developed their programs.
5. Paragraph 12 on page 4 of the OMB Supporting Statement describes the implementation burden as being "annualized over three years." Given the current schedule of implementing the proposed rule on January 1, 1997, it would seem that the entire implementation burden would be incurred in 1996 in order to begin data collection by the scheduled date.

6. Having done a preliminary review of all the information provided, DLC suggests that the best way to minimize the regulatory burden for the NRC and utilities is to postpone issuance of the proposed rule and concentrate on enhancing the Institute of Nuclear Power Operations (INPO) Safety System Performance Indicators (SSPI) Program to meet the NRC needs. The current SSPI systems could be supplemented from the "Basic Systems List" contained on page 5324 of the Federal Register, dated February 12, 1996. Modifications to the INPO SSPI Program should also be minimized. If this approach is taken, the NRC and utility burden for collecting improved industry-wide data on the performance of risk-significant systems will be minimized.