

NOV 06 1985

Dr. Zack T. Pate, President
Institute of Nuclear Power Operations
1100 Circle 75 Parkway
Suite 1500
Atlanta, GA 30339

Dear Dr. Pate:

SUBJECT: STATUS OF THE NUCLEAR PLANT RELIABILITY DATA SYSTEM

This is in response to your October 22 letter commenting on the NRC's seventh Semiannual Evaluation of the Status of the Nuclear Plant Reliability Data System (NPRDS). As you suggested, I have provided your letter to the appropriate NRC staff, and I would like to share with you their reaction and comments.

When INPO took over the management and direction of the NPRD System in mid-1981, it was recognized by INPO to be a test of the industry's ability to self-regulate. That is, through industry's efforts, including plant evaluations, discussions with utility management, and peer pressure, all plants would strive to reach a standard of excellence and in so doing would at least reach the level of performance of component failure reporting that would be present through government regulation.

Now you indicate that the NPRD System has achieved its objectives, that the point has been reached which "...represents virtually full utility participation...", and that, as a result, all INPO needs to do is "...to keep track of and act on occasional lapses."

NRC staff members familiar with individual plant performance in the NPRD System believe your assessment is not correct. Neither the data provided in your letter nor the information available to the NRC support such a conclusion. Despite intensive and aggressive action by INPO management, data available to the NRC indicates that as of the first quarter of CY 1985, the NPRD System had not yet reached the point where all plants are participating in accordance with NPRDS procedures. Thus, it is our view that the NPRDS objectives have not been achieved, and substantial numbers of reportable component failures are not being entered into the system.

Thus, Zack, as I see it, the issue is not whether significant improvements have been made in the NPRD System over the past several years. Everyone agrees that this has occurred, and this fact has been repeatedly stated in the NPRDS evaluation reports to the Commission. The issues are whether all plants are

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fully participating in the NPRD System and, accordingly, whether the industry has demonstrated the capability for self-regulation in this area. The data available to us does not yet allow us to share the conclusion that all plants are satisfactorily participating in the NPRD System. I am hopeful, however, that this goal will be reached, and if it is, I will be pleased to report this milestone in a future semiannual evaluation report.

With regard to our most recent evaluation report itself, evidently you are not aware that the report was not developed by a contractor. We did use a contractor to extract and process the raw data, but the evaluation was performed by senior NRC staff members. This process is the same as that discussed with INPO personnel in the past and is fully consistent with our past agreements and understandings.

Additionally, evidently you are also not aware that the evaluation report to the Commission included your July 25, 1985 letter for information and perspective. Our analysis, however, was based on the specified report period, and thus we committed to evaluate the "more current" data in our next report.

Finally, we are not aware of any deficiencies in our methodology which would cause these evaluation reports to be "uninformed" or "misleading." I am told that in past discussions with your staff, no deficiencies in methodology were identified that required changes. However, I agree that additional discussions between our respective staffs would be helpful, particularly to review the INPO data which supports your conclusion that the NPRD System objectives have been achieved, i.e., all plants are now satisfactorily participating in NPRDS. In the meantime, I believe the NPRDS evaluation reports continue to be needed since they serve a useful function for both of us in focusing our attention on the status of the NPRD System and on the areas warranting further improvement.

Sincerely,

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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