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65FR78215

12/14/00

(15)

Mr. David Meyer
Chief, Rules and Directives Branch
Office of Administration, Mail Stop T6D59
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001

Subject: Comments on the Reactor Oversight Process [65FR78215]

Dear Mr. Meyer:

This letter provides Southern California Edison's (SCE's) comments on the first year of initial implementation of the new NRC Reactor Oversight Process requested in the subject Federal Register Notice.

SCE concludes that the new Reactor Oversight Process is substantially superior to the previous program involving the Systematic Appraisal of Licensee Performance, Watch List plants, etc. SCE has found the new program to be more scrutable and objective, more risk informed, more predictable, and more focused on safety. In addition, however, the past year's experience has identified opportunities for improvement to the Reactor Oversight Process. We suggest to maintain the continued integrity of the regulatory process, the following:

- Future changes to the Reactor Oversight Process be made only after thoughtful consideration, including benchmarking proposed changes at pilot plants.
- Continue the Frequently Asked Question (FAQ) process to identify and resolve issues outside the inspection and enforcement process. In addition, the FAQ process should be expanded to all elements of the Reactor Oversight Process (Significance Determination Process, Action Matrix, etc.).

SCE has participated in and endorses the comments provided by the Nuclear Energy Institute on April 13, 2001.

If you have any questions or require any additional information, please feel free to contact us.

Sincerely,



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