

Ms. Melinda Malloy  
February 4, 2000  
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NUCLEAR ENERGY INSTITUTE

James W. Davis  
DIRECTOR  
OPERATIONS DEPARTMENT,  
NUCLEAR GENERATION

February 4, 2000

Ms. Melinda Malloy  
Rulemaking Section Chief  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**SUBJECT:** Draft Rule on Event Reporting Requirements

**PROJECT NUMBER:** 689

Dear Ms. Malloy,

At the February 3 Advisory Committee for Reactor Safeguards (ACRS) meeting the NRC staff reported that the section on reporting degraded components (10 CFR 50.73(a)(2)(ii)(C)) had been significantly modified. Although not required by the rulemaking process, we believe that a one-day workshop to review this new language and supporting implementation guidance in NUREG-1022 would help the staff meet its goal of improving clarity of event reporting requirements.

During development of the proposed rules the staff conducted workshops and table-top sessions which allowed testing draft wording with real-world scenarios. Participation by industry representatives, regional staff, and headquarters staff developed insight to achieve clear wording that would meet the intent of the proposed requirement. These meetings significantly helped in developing other sections of the proposed rule.

We therefore recommend that the staff schedule a one-day public meeting to discuss this one section of the draft rule. It is recommended that the proposed section and supporting NUREG-1022 examples be made publicly available before the meeting. This one-day workshop would be focused only on this section of the draft rule. Industry representatives would participate by providing feedback and bringing scenarios to help validate the clarity of the wording of the rule and examples provided.

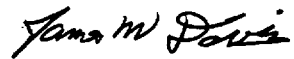
We recognize that adding this public meeting may require a schedule delay. We believe the potential to improve the clarity of the final rule is worth the slight delay.

D046  
Rec'd from NRC  
12/26/01

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If you have any questions, please call me at 202-739-8105 or Bob Post at 202-739-8115.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Davis". The script is cursive and fluid, with the first name "James" and last name "Davis" being clearly legible.

James W. Davis

**From:** "DAVIS, Jim" <jwd@nei.org>  
**To:** "mxm@nrc.gov" <mxm@nrc.gov>, "sfn@nrc.gov" <sf...  
**Date:** Fri, Feb 4, 2000 4:50 PM  
**Subject:** Letter on draft rule on event reporting

Attached is a copy of the letter recommending a one day workshop on the component reporting section of the event reporting rule. You have a choice of Word format or PDF format---if you can get one open, don't bother with the other one, they are the same. A hard copy will be mailed Monday.

Jim Davis  
NEI  
202-739-8105

**CC:** "POST, Bob" <REP@nei.org>



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FORWARDING AND ADDRESS CORRECTION REQUESTED

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