

DEPARTMENT OF NUCLEAR SAFETY

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George H. Ryan
Governor

Thomas W. Ortziger
Director



February 8, 2002

Paul H. Lohaus, Director
Office of State and Tribal Programs
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike, 3rd Floor
Rockville, MD 20852

Re: Program Management Information: Request for Comment on Action Plan to
Implement Recommendations of NRC/Agreement State Working Group on Event
Reporting (STP-01-085)

Dear Mr. Lohaus:

The Illinois Department of Nuclear Safety has reviewed the above-referenced document. The NRC staff prepared the action plan to provide a proposed response to each of the recommendations contained in the "Final Report of the Working Group on Event Reporting" dated April 2001. NRC established the working group (WG) in April 2000. The purpose of the WG was to review the current event reporting process and develop recommendations to provide a more realistic, efficient, and effective program. The WG report makes 33 specific recommendations, with priorities, and recommends 62 rule changes. The action plan endorses 28 of the specific recommendations and 44 of the rule changes.

Appendix D of the action plan contains a consensus of NRC managers on each of the WG recommendations. The managers apparently agreed with recommended changes that would either move or provide cross-references to reporting requirements. The introduction to Appendix D suggests that these recommendations be implemented as part of other rulemakings. The Illinois Department of Nuclear Safety agrees that these changes do not deserve separate rulemakings, but should be included when changes to a particular rule are made for other purposes.

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The Illinois Department of Nuclear Safety recommends that reporting requirements be risk-informed and applied uniformly whether the material is specifically or generally licensed. This is especially true for tritium exit signs, for which recent contamination events have illustrated the high cost of remediation when broken. When reviewing the reporting requirements in 10 CFR 30.55(c), NRC might also consider reviewing the exemption at 10 CFR 30.55(d), which applies to generally licensed tritium exit signs.

In general, the Illinois Department of Nuclear Safety believes that the recommendations of the WG were given careful consideration. The plan as proposed would appreciably enhance the current system of event reporting.

Please call me at (217) 785-9917 if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Joseph Klinger / Gmc".

Joseph G. Klinger, Chief
Division of Radioactive Materials

JGK:JME