

~~50-263~~ / 282 / 906

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

FILE NUMBER

INCIDENT REPORT

TO: Mr. D. K. Davis

FROM: NSP
Minneapolis, Minnesota 55401
L. O. Mayer

DATE OF DOCUMENT
09/27/77

DATE RECEIVED
09/30/77

☒ LETTER
☐ ORIGINAL
☒ COPY

☐ NOTORIZED
☒ UNCLASSIFIED

PROP

INPUT FORM

NUMBER OF COPIES RECEIVED

1 CC

DESCRIPTION

Advising that NSP finds it impracticable to implement the revised format for reporting non-routine occurrences that are required by tech specs, and furnishing comments therefor...

3p

PLANT NAME: MONTICELLO
PRAIRIE ISLAND UNITS 1 & 2
jcm 09/30/77

ENCLOSURE

NOTE: IF PERSONNEL EXPOSURE IS INVOLVED
SEND DIRECTLY TO KREGER/J. COLLINS

FOR ACTION/INFORMATION

BRANCH CHIEF:

W/ 4 CYS FOR ACTION

LIC ASST.:

DAVIS

INTERNAL DISTRIBUTION

REG FILE (3)

NRC PDR

I & E (2)

MIPC

SCHROEDER/IPPOLITO

HOUSTON

NOVAK/CHECK

GRIMES

KNIGHT

BUTLER

HANAUER

TEDESCO

EISENHUT

BAER

SHAO

VOLLMER/BUNCH

KREGER/ J. COLLINS

ROSA

EXTERNAL DISTRIBUTION

LPDR: Minneapolis, MN.

TIC:

NSIC:

ACRS (16) SENT AS CAT. B

CONTROL NUMBER

772730158

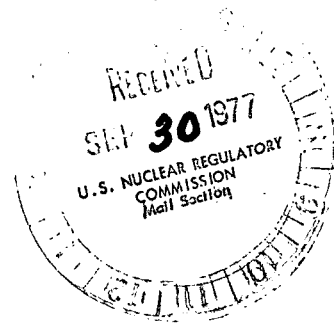
NSP

REGULATORY DOCKET FILE COPY

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

September 27, 1977



Mr D K Davis, Acting Chief
Operating Reactors, Branch #2
c/o Distribution Services Branch, DDC, ADM
U S Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr Davis:

MONTICELLO NUCLEAR GENERATING PLANT
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22
Docket No. 50-282 License No. DPR-42
Docket No. 50-306 License No. DPR-60

Licensee Event Reporting

Your letter dated August 12, 1977 requested that we use a "slightly modified format" for reporting those non-routine occurrences that are required by our technical specifications. Your letter further requested that we review the revised instruction manual for preparation of the Licensee Event Report forms and make plans to use the revised form and instructions starting with the first reportable occurrence after September 30, 1977.

We find it impracticable to implement the revised reporting by October 1, 1977. Your August 12, 1977 letter was not received until September 9, 1977 and it did not include supplies of the Licensee Event Report form. (Additional instruction manuals and LER forms have been ordered from MIPC.) The Monticello Nuclear Generating Plant is currently in the midst of a refueling outage and this will be followed by a similar outage for Prairie Island Unit No. 2 later this fall. Additional time is needed for us to procure the necessary instruction booklets and forms, allow the plant to review them and establish new reporting routines during a period of time when they are not involved in a heavy outage work load and to establish a uniform implementation date between the two plant organizations. We will implement use of the revised Licensee Event Report form, following the instructions contained in NUREG-0161 to the maximum extent practicable, starting with the first reportable occurrence after January 1, 1978.

We are most disturbed by your request that we provide a complete narrative report of the event for all 14-day Licensee Event Reports. The revised instruction manual further expands your reporting request by stating that most events which require reporting on a 30-day basis will generally require an attachment as described above. This is a new and separate reporting requirement which will add to the already burdensome reporting requirements and extensive requests for information from the NRC.

772730158

NORTHERN STATES POWER COMPANY

Mr D K Davis
Page 2
September 27, 1977

In September, 1974, the AEC published Revision 2 of Regulatory Guide 1.16 for comment by power reactor licensees. This was followed by Regional meetings to secure input from these licensees and to explain the proposed reporting under the computerized Licensee Event Report concept. Prior to that time, most of these licensees had been submitting narrative type reports on occurrences at the nuclear plants. At the meeting on November 7, 1974 in Region III at Chicago, the utility representatives took strong exception to what appeared to be an increasing reporting burden under Regulatory Guide 1.16. It was explained to us that the reporting burden should be somewhat reduced by adoption of Regulatory Guide 1.16 and the Licensee Event Report form; in most cases, the report would be a 30-day written report as opposed to the prompt notification with written follow-up report 14 days later. The NRC representatives stated that the number of items to be reported had been reduced. When the utility representatives again expressed concern over having to supply not only a completed LER form, but also a narrative summary, they were informed that in 90% of the cases, the LER form would suffice.

NSP has filed narrative summaries to supplement the LER forms on occasions where additional information was needed to explain an event that might have significant interest or safety impact; we have also filed supplemental information at the request of the NRC inspector. In addition, for every reportable occurrence and certain other non-reportable occurrences, a thorough investigation is conducted, an investigative report is prepared which contains recommendations for corrective actions, and these are reviewed by plant management and the appropriate review groups. These internal investigative reports contain very detailed information and preliminary recommendations, cannot usually be completed in the 14-day or 30-day time frame, and may contain information that is proprietary, personal, or otherwise unsuitable for docketing. However, these investigative reports are made available to the NRC inspector during his visits, and can be utilized in that manner to perform a safety assessment of the event. We intend to continue our past practice of submitting supplemental information with the LER forms on those occasions where we believe it is appropriate, or on those occasions where we agree with the inspector's evaluation that a supplemental report is indicated.

We ask that the NRC reconsider their request for the production of a narrative report for each Licensee Event Report submitted. We believe it would be appropriate for the NRC to demonstrate how this additional reporting would result in a commensurate increase to the health and safety of the public, the regulatory basis for making such a request, and make provision for industry-wide review and comment on this proposal, similar to the opportunity provided in 1974 when the occurrence reporting policy was substantially revised.

As a Licensee for two nuclear plants, we transmitted about 315 separate reports to the NRC in 1976, almost all of which consisted of 40 copies of multi-page reports. On the basis of about 75 Licensee Event Reports having been submitted for Monticello and Prairie Island in 1976, the NRC request means that an additional 75 separate narrative summary reports would have to be prepared, reviewed, printed and included for submittal with the Licensee Event Report. This large number of Licensee Event Reports stems, in part, from the NRC policy of over-reporting as expressed in the

NORTHERN STATES POWER COMPANY

Mr D K Davis
Page 3
September 27, 1977

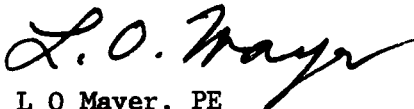
introduction to one of the Reports to Congress on Abnormal Occurrences, as follows:

"The NRC reviewed events reported at the 62 nuclear power plants licensed to operate during..... None affected the public health and safety; adequate levels of protection were available in each event to assure no adverse impact on the public health and safety..... Because of the broad scope of regulation and the conservative attitude toward safety, there are a large number of events reported to the NRC..... (Emphasis added) Most of the reports received from licensed nuclear power facilities describe events that did not directly involve the nuclear reactor itself, but involved equipment and components which are peripheral aspects of the nuclear steam supply system, and are minor in nature with respect to the impact to the public health and safety. The majority are discovered during routine inspection and surveillance testing and are corrected upon discovery. Typically they concern single malfunctions of components or parts of systems with redundant operable components or systems continuing to be available to perform the design function."

The above reinforces our belief that the Licensee Event Reports are used mostly for data collection in an attempt to determine equipment reliability, but also to indicate areas where further action might be warranted through the issuance of I&E Circulars and Bulletins or further investigation through the I&E inspection process. We believe that the present process provides ample information to permit safety assessment of events through I&E/Licensee on-site or verbal contacts.

We ask your cooperation in an attempt to halt the ever-increasing reporting burden being thrust upon reactor licensees. Should the NRC wish to convene some type of meeting with reactor licensees to discuss this, and other reporting requirements, we would be pleased to attend, explain our position and provide comment on proposed improvements in the reporting process.

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/ak

cc: J G Keppler
Director, MIPC, USNRC
G Charnoff
MPCA - Attn: J W Ferman