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Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration  
Mail Stop: TWB-05-B01 M  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

10/13/2011

76 FR 63565

14

Joseph M. Farley Nuclear Plant - Units 1 and 2  
Edwin I. Hatch Nuclear Plant - Units 1 and 2  
Vogtle Electric Generating Plant - Units 1 and 2  
Southern Nuclear Comments on Draft NUREG-1022, Revision 3

Ladies and Gentlemen:

The U. S. Nuclear Regulatory Commission (NRC) published Draft NUREG-1022, Revision 3, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73" in the Federal Register on October 13, 2011 (76 FR 63565). In the referenced Federal Register Notice, the NRC solicited comments on the Draft NUREG by December 12, 2011.

Southern Nuclear Operating Company (SNC) has reviewed the proposed NUREG-1022, Revision 3 and provides comments specific to SNC in the Enclosure. In addition, SNC endorses the comments made by the Nuclear Energy Institute (NEI) on behalf of the nuclear industry. SNC has actively participated in the industry task team sponsored by NEI throughout the process of drafting the proposed NUREG revision. If you have questions regarding this letter, please contact Tracy Honeycutt at (205) 992-6896 or me at (205) 992-7673.

Respectfully submitted,

*Mark J. Ajluni*

M. J. Ajluni  
Nuclear Licensing Director

MJA/DWM/lac

Enclosure: Southern Nuclear Comments on Draft NUREG-1022, Revision 3

*SUNSI Review Complete  
Template = ADM-013*

*E-RIDS = ADM-03  
Cell = A. Lewin (9124)*

cc: Southern Nuclear Operating Company  
Mr. S. E. Kuczynski, Chairman, President & CEO  
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer  
Mr. T. A. Lynch, Vice President - Farley  
Mr. D. R. Madison, Vice President - Hatch  
Mr. T. E. Tynan, Vice President - Vogtle  
Mr. B. L. Ivey, Vice President - Regulatory Affairs  
Ms. P. M. Marino, Vice President - Engineering  
RType: Farley=CFA04.054; Hatch=CHA02.004; Vogtle=CVC7000

U. S. Nuclear Regulatory Commission  
Mr. V. M. McCree, Regional Administrator  
Mr. R. E. Martin, NRR Project Manager - Farley  
Mr. E. L. Crowe, Senior Resident Inspector - Farley  
Mr. E. D. Morris, Senior Resident Inspector - Hatch  
Mr. L. M. Cain, Senior Resident Inspector - Vogtle  
Mr. P. G. Boyle, NRR Senior Project Manager-Vogtle, Hatch

**Joseph M. Farley Nuclear Plant - Units 1 and 2  
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**Enclosure**

## Enclosure

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### Southern Nuclear Comments on Draft NUREG-1022, Revision 3

Page	Draft NUREG 1022 Statement	Comment
39	"Entry into STS 3.0.3", added discussion	Since the examples did not change, this added discussion is very confusing. Need an example to help explain added text.
26	Page 26, bottom of page it states "Accordingly, it makes sense..."	"Sense" is very subjective. Suggest to just state "Accordingly, provide the report..."
58	Systems within the scope of these criteria include those systems required by the TS to be operable to perform one of the four functions (A) through (D) specified in the rule, as well as their support systems that are also retained in the TS. This supersedes the discussion found in RIS 2001-14, "Position on Reportability Requirements for Reactor Core Isolation Cooling System Failure," dated July 19, 2001.	This additionally increases the scope of systems that were included in the original reporting requirements. Need to add clarity in regards to including support systems. The support systems should only be included if it is assumed in the plant's accident analysis to perform one of the four functions (A) through (D) specified in the rule. Sounds like this change is requiring cascading of TS.
102	Revision 3 removed any reference to Part 21.	This is a departure from the industry interpretation, i.e. that if an item is installed in the plant, it's not evaluated under the part 21 criteria. This will result in a significant increase in Part 21 issues.