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TO:

Mr. Benard C. Rusche

FROM:

Carolina Power & Light Company
Raleigh, North Carolina
E. E. Utley

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1/7/77

DATE RECEIVED

1/10/77

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DESCRIPTION

Ltr. re our 12/1/76 ltr....furnishing
comments on model annual operating reports.

(3-P)

PLANT NAME:

H. B. Robinson/No. 2/Brunswick Unit No. 2/

ENCLOSURE

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RJL

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248



Carolina Power & Light Company

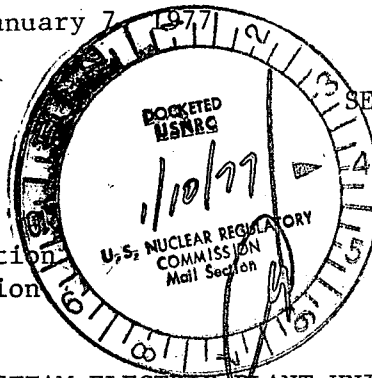
Regulatory Docket File

January 7, 1977

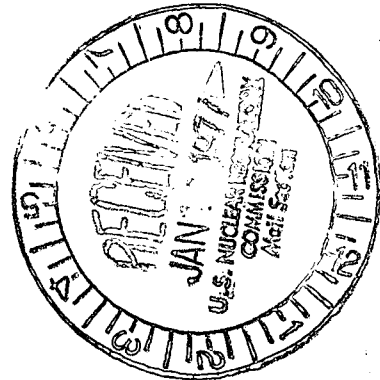
FILE: NG-3514(B&R)

SERIAL: NG-77-016

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



H. B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2
BRUNSWICK STEAM ELECTRIC PLANT UNIT NO. 2
DOCKET NOS. 50-261 & 50-324
COMMENTS ON MODEL ANNUAL OPERATING REPORTS



Dear Mr. Rusche:

We have received your December 1, 1976 letter concerning the model annual operating report. While agreeing that standard format and content guidelines would be useful, we feel that the proposed model report is inappropriate for use at this time.

The model annual operating report was obviously compiled by combining only the most extensive sections of many prior annual operating reports received by the Nuclear Regulatory Commission (NRC). While this compilation method ensures a document of great thickness, it does not make the proposed model very practical. A report based upon the model report would require much time and effort to produce; and the report would consist largely of unnecessary or previously reported data. A well-thought out, realistic consolidation and reevaluation of all reporting requirements would be welcome, but the imposition of another reporting standard which requires redundancy in the information supplied can not be beneficial.

CP&L participated in the earlier rounds of comments on the model report under the auspices of the Atomic Industrial Forum (AIF). A page-by-page comparison of the December 1, 1976, model report with the original model report indicates that apparently no attempt has been made to rectify any of the concerns expressed through AIF. Not only have all industry comments been ignored, but instances of inaccuracy and ambiguity pointed out by NRC staff members have not been corrected. Through AIF, we were apprised of a July, 1976, NRC memorandum from W. G. McDonald, Director of the Office of Management Information & Program Control to R. B. Minogue, Director of the Office of Standards Development outlining some of the AIF comments and proposing resolutions. None of the necessary changes and clarifications outlined in that memorandum have been incorporated in the annual operating model report transmitted to us.

248

Specific comments on the proposed model annual operating report format are given below:

Page 3. Summary of Operating Experience.

The summary example is incredibly detailed. No current regulatory guide requires this amount of information to be provided. In fact, Regulatory Guide 1.16, Subsection C.1.b. (2) specifically exempts one from providing much of the detail given in this example. After examining the summary example, it is also apparent that the NRC intends to increase utility reporting without actually changing the regulatory requirement. A specific example of this intention is that power reductions of as little as 5% are reported. It should be noted in discussion of this issue that Regulatory Guide 1.16 Revision 4 has two definitions of significant power reductions. The most reasonable definition which should be used in the annual operating report is included on page 1.16-14 of Regulatory Guide 1.16. That definition states that a significant power reduction is a power reduction of 20% in daily average power level for the preceding 24 hours. The use of this definition was strongly advised by the AIF ad hoc committee in their comments.

Page 8.

A general comment on all of the requirements on this page is that information which has already been sent to the NRC should not be resubmitted on an annual basis. Utilities should not incur substantial time and manpower losses from productive work in order to accommodate the failure of the NRC to develop an adequate system to deal administratively with utility submittals and to develop an effective internal system of utilizing previously reported data. Proper definition on what constitutes safety-related maintenance is badly needed. We can find no evidence that anyone in any organization except that of the originating utility ever has or ever will review the detailed information now required to be reported. By reducing the volume of the reported information, a meaningful and useful set of data could be developed.

Page 18.

The requirement to report information in full detail which has been previously reported in Licensee Event Reports (LER) is not only unnecessary and a burden on the utility, it is specifically not required by Regulatory Guide 1.16, Revision 4. Item C.1.b (2) (b) of that Regulatory Guide requires only a reference to an LER, not a complete repetition of the information contained therein. Updated information for LER's is transmitted to the Commission as the data becomes available and should not be withheld for an annual submittal.

January 7, 1977

Page 21.

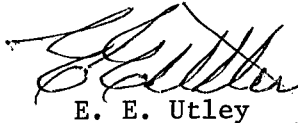
Regulatory Guide 1.16 is quoted as having required this section on "Other Events of Interest;" it does not, in fact, contain any such requirement. Also, you propose that tests identified in Section C.1.b (4) be reported regardless of purpose or results. In fact, a reasonable interpretation of this section of Regulatory Guide 1.16 will show that the intent of the paragraph was to deal with the determination and reporting of fuel rod failures. The tests are mentioned only as examples of the type of tests which might provide utilities with information on fuel failures. If these tests are performed and no failures are found, no report is required. As written, the proposed format did not limit the reporting of results of such tests to fuel failures nor even to the reactor system.

Page 29.

It is noted that no Regulatory Guide or other reference is provided to demonstrate why information on electrical generation is required yet again. If no specific requirement for electrical power information in the content of an annual operating report can be quoted, it is not required. This information is readily available to the NRC staff in the "Grey" book (NUREG - 0020). No useful purpose can be served by requiring the utility to recompile and resubmit data already in the possession of the NRC.

For the reasons indicated above, CP&L does not believe that the proposed model annual operating report is appropriate for its 1976 annual reports. Our reports will be in compliance with Regulatory Guide 1.16, Revision 4 and the unit technical specifications. However, we recognize the potential usefulness of a standard report and are willing to cooperate in any way with the staff to develop an appropriate model.

Yours very truly,



E. E. Utley
Senior Vice President
Power Supply

CSB/RGB/c11