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Mr. Benard C. Rusche

FROM:

Duke Power Company  
Charlotte, North Carolina  
Mr. William O. Parker, Jr.

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DESCRIPTION

Ltr. re our 12/1/76 and 12/22/75 ltrs...  
concerning format for annual operating  
reports for Units 1-2-3...

(3-P)

PLANT NAME:

Oconee Units 1-2-3

ENCLOSURE

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ACKNOWLEDGED

## SAFETY

FOR ACTION/INFORMATION

ENVIRO 1/18/77

RJL

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☒ BRANCH CHIEF: Schwencer

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DUKE POWER COMPANY

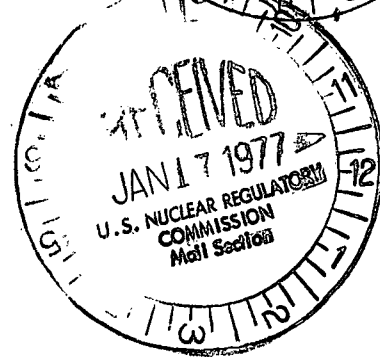
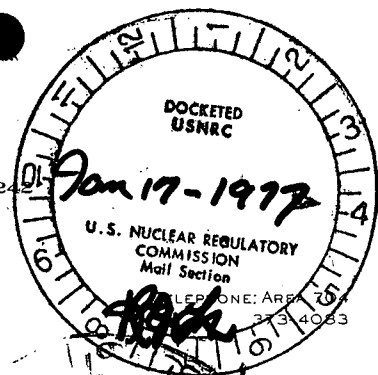
POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28244

WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

January 14, 1977

**Regulatory Docket File**



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

Re: Oconee Nuclear Station  
Docket Nos. 50-~~269~~, -270, -287

Dear Mr. Rusche:

Your letter of December 1, 1976 transmitted a suggested format for annual operating reports for our information and review. Your letter also requested that we advise of whether or not our annual operating report for 1976 would be submitted in conformance with the model format. Pursuant to your request, the suggested format has been reviewed and our response is provided below.

While the concept of a standard format could be valid, we are distressed and perturbed by the apparent increase in, and duplication of, reporting that would ensue if the proposed "format" guide were adopted. This is particularly disturbing since the suggested format, in many instances, has no identifiable relationship to the NRC's nuclear safety responsibility. That much of the information requested is not within the Commission's legitimate purview is further evidenced by a comparison with Regulatory Guide 1.16, Revision 4, and Technical Specifications established pursuant thereto.

Regulatory Guide 1.16 underwent several revisions, in a relatively short period of time, resulting in Revision 4 being issued in August, 1975. Revision 4 contains specific information on the content of an annual operating report. While not necessarily agreeing that all information requested by the Regulatory Guide has safety significance, we did, in response to a request from the NRC, propose changes to the Oconee Technical Specifications consistent with the provisions of the Guide. In issuing the resulting license amendment on December 22, 1975 the Commission stated that the change would serve to delete any reports no longer needed for assessment of safety-related activities. Our present review of the suggested format guide results in concurrence with that previous NRC statement. That is, that information requested by the current proposed format, which is in excess of that to be provided pursuant to the Oconee Technical Specifications, is indeed not needed for assessment of safety-related activities.

Specific comments on the suggested annual operating report format are as follows:

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1. With regard to the "Introduction" section, Regulatory Guide 1.16 does not provide for and no need is perceived for reporting personnel changes. However, if such are to be reported, a tabular presentation is considered more appropriate and meaningful.
2. The "Highlights" section appears to be unnecessary, as detailed information is presented elsewhere in the report, and specifying that licensees provide an "executive summary" is not appropriate.
3. The narrative approach to "Summary of Operating Experience" is verbose and impractical. Tabulations, histograms, charts, etc. are not concise and meaningful and are utilized in other reports currently provided to the NRC such as the monthly operating status reports.
4. There is no requirement or justification for identifying in the manual operating report amendments to facility operating licenses or Technical Specifications. Such amendments have been approved and issued by the NRC and documented in the Federal Register. We see no purpose in a licensee reporting to the Commission license amendments approved and issued by the Commission.
5. Reporting of facility or procedure changes and tests and experiments requiring prior NRC approval is not required or justified. Such changes, tests and experiments have already been approved and issued by the NRC and documented in the Federal Register. We see no purpose in a licensee reporting to the Commission an action which was predicated upon prior Commission approval.
6. There is no necessity nor justification for including licensee event reports (i.e., reportable occurrences) in the annual operating report. Such reports have previously been filed with and processed by the NRC and are available through such mechanisms as the Commission's monthly Licensee Event Report System.
7. The "Other Events of Interest" section represents an extension of reporting requirements which is unjustified and is not appropriate via the mechanism of a "format" guide. For example, the section addresses steam generator inspection results and containment penetration leak rate test results.

In summary, it is considered that the suggested annual operating report format represents an attempt to require each licensee to provide an annual tabulation of all information relative to a particular reactor, whether or not such information is useful or had previously been provided to the NRC. Such an approach without concurrent reappraisal and alteration of the NRC's other (duplicative) reporting mechanisms is unjustified.

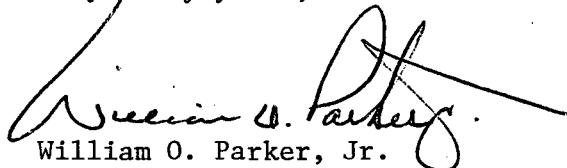
Mr. Benard C. Rushe

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Accordingly, in order to avoid an unnecessary extension of paperwork, the 1976 annual operating report for Oconee Nuclear Station will provide that information required by the Oconee Technical Specifications, consistent with the provisions of Regulatory Guide 1.16, and will present such information in as meaningful a format as practical.

Very truly yours,

A handwritten signature in dark ink, appearing to read "William O. Parker, Jr.", with a long horizontal flourish extending to the right.

William O. Parker, Jr.

DCH:ge