

# FORD 1

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SUBJECT: Comment opposing rev 1 to draft NUREG-1022, "Event Reporting  
 Sys-10CFR50.72 & 50.73: Clarification of NRC Sys & Guidelines  
 for Reporting."

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John L. Crooks

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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January 30, 1992  
GO2-92-027

Docket No. 50-397

Mr. David L. Meyer, Chief  
Regulatory Publications Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Meyer:

**SUBJECT: WNP-2, OPERATING LICENSE NPF-21,  
WASHINGTON PUBLIC POWER SUPPLY SYSTEM'S COMMENTS  
ON DRAFT NUREG-1022, REVISION 1**

On October 7, 1991, the U. S. Nuclear Regulatory Commission (NRC) issued for public comment a draft report, NUREG-1022, Revision 1 "Event Reporting Systems--10 CFR 50.72 and 50.73: Clarification of NRC Systems and Guidelines for Reporting." The notice of availability in the Federal Register (56 FR 50598) requested comments by December 6, 1991. Because of the importance of the proposed NUREG and the time required to develop meaningful comments, the Nuclear Management and Resources Council (NUMARC) request an extension of the comment period to the end of January 1992. This extension was granted on November 25, 1991 (56 FR 59303).

The Washington Public Power Supply System (Supply System), an NRC licensee, appreciated the opportunity to review and comment on this proposal NUREG. Our comments in this letter will not be detailed. We have participated in the preparation of comments being submitted on behalf of the industry by NUMARC and support those comments as representing our own concerns. In addition, we have participated in comments being submitted by the legal firm Winston and Strawn on behalf of several of their clients, including the Supply System. These comments also reflect our concerns. The purpose of this separate letter is to underscore the concern that we have, as an NRC licensee, with the proposed revision to NUREG-1022.

The Supply System attended the NRC Region IV and V event reporting workshop in November 1990 and felt encouraged by the NRC presentation that improvements, such as relaxation to reduce unnecessary reporting, would be realized with the revision to NUREG-1022. Following our review, we are disappointed to find that the revision has not only failed to reduce unnecessary reporting but has increased the reporting that would be required. At a time when utilities across the country are looking at ways to reduce operating costs and concentrate their

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Mr. David L. Meyer, Chief

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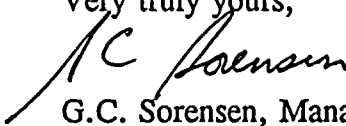
**WASHINGTON PUBLIC POWER SUPPLY SYSTEM'S COMMENTS  
ON DRAFT NUREG-1022, REVISION 1**

resources on meaningful activities which will enhance safety and improve performance, the issuance of revised guidelines which increase the requirement for reporting with no apparent safety benefit is a difficult pill to swallow. The Supply System has spent in excess of 100 manhours reviewing the draft NUREG, developing comments and interfacing with outside organizations in the preparation of comments.

We encourage the NRC to seriously consider the industry comments on NUREG-1022, Rev 1 and make changes as necessary to meet the stated goal that "reporting requirements should not interfere with ensuring the safe operation of a nuclear power plant. Licensee's immediate attention must always be given to operational safety concerns" (NUREG-1022, Rev 1, Page 1).

We appreciate the opportunity to participate in the review of the draft NUREG-1022, Rev 1 and trust that our input will be of benefit to your process.

Very truly yours,



G.C. Sorensen, Manager  
Regulatory Programs (Mail Drop 280)

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