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SUBJECT: Comment on "Review of NRC Insp Rept Content, Format & Style." NRC insp repts should provide balanced perspective, reflecting licensee strengths & positive aspects of programs & activities reviewed.

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RULES REVIEW & DIR. BR.
USNRC

Docket No. 50-397

David Meyers, Chief
Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration
Mail Stop: T-6D-59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Subject: **WNP-2, OPERATING LICENSE NPF-21
COMMENTS ON FEDERAL REGISTER NOTICE (60 FR 28180), REVIEW
OF NRC INSPECTION REPORT CONTENT, FORMAT, AND STYLE**

In the subject Federal Register notice, the NRC requested comment on whether the content, format and style of inspection reports are appropriate and how they may be improved. The Supply System has reviewed the subject notice and we have developed the following comments:

- NRC inspection report writers should ensure that all relevant facts are included in the description of an issue, especially when the staff has taken a position differing from that of licensee management. Taken alone, a report that presents only the facts favorable to the NRC's position on an event or issue deprives a third party of the ability to make an independent judgment. Although a licensee can respond to such omissions on the docket, there is no guarantee that inspection report users will be able to correlate the additional docketed information with the inspection report.
- NRC inspection reports should provide a balanced perspective, reflecting licensee strengths and positive aspects of programs and activities reviewed. Currently, inspection reports tend to be predominantly negative, which may give the public, et al, an incorrect perception of licensee performance.
- Many inspection reports could be streamlined by eliminating detailed technical or design information available in other documents. By including only the pertinent facts of the inspection or issues, readability could be enhanced and preparation time and costs minimized. Additionally, by including only the relevant facts, inspection reports could avoid subjective assessments and unsupported conclusions.

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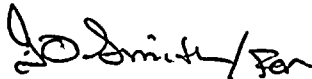
COMMENTS ON FEDERAL REGISTER NOTICE (60 FR 28180), REVIEW OF NRC INSPECTION REPORT CONTENT, FORMAT AND STYLE

- Inspection reports should provide an adequate context for violations, with a clear assessment of safety significance. An assessment should include whether the violations are isolated with respect to overall licensee performance.

The Supply System appreciates the opportunity to comment on the subject federal notice. We feel that our comments, if incorporated into the NRC inspection report process, will enhance the reports themselves and improve NRC and licensee communication.

If you have any questions or require further information regarding our comments, please contact me or P. R. Bemis at (509) 377-4027.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

AGC/ml

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