

PUBLIC SUBMISSION

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Docket: NRC-2018-0201

Elimination of Immediate Notification Requirements for Non-Emergency Events

Comment On: NRC-2018-0201-0002

Elimination of Immediate Notification Requirements for Non-Emergency Events

Document: NRC-2018-0201-DRAFT-0012

Comment on FR Doc # 2018-25273

Submitter Information

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General Comment

See attached file(s)

Attachments

STARS Comments to NRC Docket 2018-0201 Non-Emergency Event Reporting Final

STARS-19001

February 4, 2019

Ms. Annette L. Vietti-Cook, Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-001
ATTN: Rulemaking and Adjudications Staff

Subject: STARS Alliance LLC Comments on Docket No. PRM-50-116; NRC-2018-0201
Elimination of Immediate Notification Requirements for Non-Emergency Events

Dear Secretary

STARS Alliance LLC appreciates the opportunity to comment on the petition for rulemaking (PRM) advocating for the elimination of requirements to immediately notify NRC headquarters of non-emergency events at commercial nuclear power plants. STARS LLC supports the PRM for the reasons stated. The following responds to the specific questions contained in the Federal Register Notice dated November 20, 2018:

- 1. The NRC publishes the event notifications it receives from licensees on the NRC's public website every weekday. Do you or does your organization regularly review these event notifications? If so, please describe your use of this information and explain how the elimination of all non-emergency event notification requirements would affect you or your organization.**

STARS regulatory affairs staff and the staff at each station regularly reviews industry event notifications. This information is generally only used for awareness of reportable industry events, and we infrequently contact the reporting station for additional details. Nearly all these events of interest are available from alternate sources. For example, third party vendors review the "Power Reactor Status Report" that shows the daily power level of each reactor and provides an explanation for changes in their daily e-mails to subscribing utilities. Also, NRC resident inspectors post "Preliminary Notification (PN) Reports" to the NRC Events website for more significant events, and these PNs are summarized in the daily e-mails. Therefore, discontinuing these non-emergency event notifications would not have an adverse effect on our organization.

- 2. If all non-emergency event notification requirements were removed from § 50.72, the NRC would still receive licensee event reports within 60 days of discovery of the event as required by § 50.73 unless there is no corresponding § 50.73 report. These reports typically contain a more detailed account of the event and are released to the public in ADAMS after receipt. There is no corresponding § 50.73 report for § 50.72(b)(2)(xi) for a news release or notification to other government agencies, § 50.72(b)(3)(xii) for transportation of a radioactively contaminated person, and § 50.72(b)(3)(xiii) for major loss of emergency assessment capability. Would the public release of licensee event reports alone meet your needs? Please explain why or why not.**



Licensee Event Reports (LERS) and NRC inspection reports, when applicable, typically provide a more detailed, albeit high level explanation, and are more effective in meeting licensee's needs because the LERS and inspection reports contain a much more complete explanation of the event, cause(s), significance and corrective actions. Licensees occasionally obtain additional details from the associated root cause evaluation reports to gain a better understanding of the event and corrective actions. Events that do not require LERS are generally of little or no interest. Licensees rely on a variety of proven and effective industry working groups to share issues of generic interest.

- 3. The petitioner asserts that the nonemergency notifications under § 50.72 “create unnecessary burdens for both the licensee and the NRC staff, and should be eliminated.” What specific provisions in § 50.72, if any, do you consider to be especially burdensome (e.g., the timing requirements for submittal of event notifications, certain types of event notifications)? Please provide a supporting justification, as appropriate.**

The most significant burden of non-emergency event reporting involves the associated disruption to control room operators and support staff. The primary burden is screening issues and selecting the specific reporting criteria within the required time. To ensure no reportable event is overlooked, operating crews must screen a large number of issues and document their decisions under time pressure. They must remain proficient at selecting appropriate and consistent thresholds and selecting all the correct reporting criteria. Furthermore, they are simultaneously responsible for informing senior management, NRC Resident Inspectors in addition to responding to the issue. The high performance of the current reactor fleet gives operating crews relatively few issues that meet a reportability threshold, and hence more difficult to maintain proficiency without recurring training. However, this screening and training burden has little if any safety benefit. The NRC Resident Inspectors are already responsible for elevating these events to their management for awareness and potential response, making the 50.72 reporting an unnecessary and redundant burden.

- 4. The petitioner asserts that § 50.72 non-emergency notifications are contrary to the best interests of the public and are contrary to the stated purpose of the regulation. Do you agree with this assertion? Please explain why or why not.**

STARS Alliance agrees with the petitioner that § 50.72 non-emergency notifications are contrary to the best interests of the public and are contrary to the stated purpose of the regulation, for the reasons stated in the petition.

- 5. Are there alternatives to the petitioner's proposed changes that would address the concerns raised in the petition while still providing timely event information to the NRC and the public? Please provide a detailed discussion of any suggested alternatives.**

STARS Alliance agrees with the proposed changes in the petition. Resident Inspectors can and do provide timely event information to the NRC and the public.

If you have any questions, please contact me at 314-225-1483, or steve.meyer@starsalliance.com.

Sincerely,

Lawrence Parker

for

Steve Meyer

Regulatory Affairs Functional Area Manager, STARS Alliance LLC