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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-0014

Comment on FR Doc # 2018-25273

Submitter Information

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General Comment

See attached file(s)

Attachments

NSPM Comments on Immediate Notification PRM

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February 4, 2019

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NRC-2018-0201

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff.

Comments on the Elimination of Immediate Notification Requirements for Non-Emergency Events (Docket ID NRC-2018-201)

By Federal Register (FR) notice (83 FR 58509) dated November 20, 2018, the Nuclear Regulatory Commission requested comments on a proposed rule petitioned by the Nuclear Energy Institute (NEI) to eliminate immediate notification requirements for non-emergency events. In the FR notice the NRC staff asked respondents to consider five specific questions when commenting on the petition.

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, operator of the Monticello and Prairie Island Nuclear Generating Plants, appreciates the opportunity to comment.

NSPM wholly supports NEI's petition. The current immediate notification requirements for non-emergency events are redundant to the existing communications that currently take place between licensees and resident inspectors and are not necessary for the NRC to meet the intent to take necessary action associated with § 50.72.

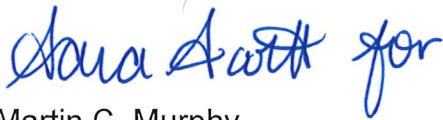
The process of engaging site resources to evaluate potentially reportable non-emergency conditions that have no or minimal nuclear safety consequences creates an unwarranted burden on licensees such as NSPM. As stated in NEI's November 26, 2018, letter regarding the OMB clearance "Comments on Information Collection: NRC Form 361, Reactor Plant Event Notification Worksheet; NRC Form 361A, Fuel Cycle and Materials Event Notification Worksheet; NRC Form 361N, Non-Power Reactor Event Notification Worksheet (NRC Docket ID NRC-2017-0060) [83 FR 48472]", the actual time in man-hours licensees expend on making a § 50.72 notification far exceeds the 30 minutes estimated by the NRC when the time to prepare, vet, and validate the non-emergency reports is included. These notifications are a distraction and burden for the reactor control room staff, whose primary responsibility is to monitor and respond to plant conditions. Site support organization resources, such as Engineering, are similarly burdened and distracted through the evaluation of these non-emergency conditions to ensure complete and accurate reports.

While NSPM appreciates the NRC's desire for public openness, publishing the non-emergency notifications daily is not integral to the stated purpose of § 50.72. Moreover, the notifications generally lack detail to allow a member of the public to understand the event's significance. The resident inspector's knowledge and site experience allows them to be a more effective information conduit associated with these non-emergency issues when communicating with NRC decision makers.

The remedies proposed by NEI are consistent with the NRC's Principles of Good Regulation. NEI's proposed change does not impinge on the independence of the agency or adversely affect the agency's openness (the NRC will continue to make any subsequent § 50.73 licensee event reports publicly available). The proposed change will improve efficiency for licensees, provide clarity regarding notification requirements, and will ensure any necessary agency actions will continue to be based on the best available information.

NSPM recognizes that alternate usage and reliance on the 50.72 non-emergency reports may have developed over time; however, it believes that the merits of the reporting requirements in 50.72 should be scoped and revised with the NRC's core mission in mind. Thus, the NRC should be focused on eliminating portions of 50.72 that "serve no safety function and are not needed to prevent or minimize possible injury to the public or to allow the NRC to take necessary action." Ancillary uses of the information that have developed over the course of time should be addressed outside of the regulatory framework, which, again, should be focused on meeting the NRC's core mission.

If there are any questions or if additional information is required please contact Mr. Leonard Sueper at (612) 330-6917.

A handwritten signature in blue ink, appearing to read "Martin C. Murphy for".

Martin C. Murphy
Director, Nuclear Licensing and Regulatory Services
Northern States Power Company – Minnesota