

From: [Munson, Jeremy](#)
To: [Kotzalas, Margie](#); [Zimmerman, Jacob](#)
Cc: [Naquin, Ty](#)
Subject: Re: Response: FYI & Query: ISG-12, 10 CFR Part 70, Appendix A - Reportable Safety Events
Date: Monday, April 29, 2019 7:48:02 AM

We recently revised MC 0616 for a similar issue regarding whether DFFI need to inspect/document and close non-safety related concurrent reports. This type of thing, since not an IROFS, should not necessarily be subject to inspection/documentation unless it is somewhere indirectly referenced in the ISA (such as an enabling event or initiating event). The revision to 0616 **allows DFFI to determine the severity of the concurrent report and determine whether they need to follow-up/inspect/document.**

Regarding whether a concurrent report is required, the expectation (and intent of the requirement) is that any time a licensee submits a report to an agency other than the NRC that they also report to us. That ensures that we are kept in the loop for all events that are externally reported even if they aren't necessarily NRC jurisdiction. Note that this does have public knowledge and interest in mind. The above revision further emphasizes that **any report (whether important to the NRC or not) should be reported to the NRC via a concurrent report so that we are aware of the communication between the licensee and the other government agency, and then we can determine the severity and appropriate response.**

For this particular situation, an informal "courtesy" notification to the Hanover County Fire Chief would not necessarily require a concurrent report. However, a formal notification **would** require a concurrent report.

ISG-12 is quite old and has problems beyond this one issue. I would suggest revising it, but since it is an INTERIM staff guidance, it would probably be best to incorporate it into a NUREG or some other permanent document.

Jeremy

From: Kotzalas, Margie
Sent: Friday, April 26, 2019 12:51:51 PM
To: Zimmerman, Jacob
Cc: Naquin, Ty; Munson, Jeremy
Subject: Response: FYI & Query: ISG-12, 10 CFR Part 70, Appendix A - Reportable Safety Events

Hi Jake. I am just now getting to your email after being out for several weeks. I have discussed this topic with DFFI in the past. Let me talk to DFFI again and with Mike to see what our thoughts are.

Margie

From: Zimmerman, Jacob

Sent: Friday, April 12, 2019 11:30 AM

To: Kotzalas, Margie <Margie.Kotzalas@nrc.gov>

Cc: Naquin, Ty <Tyrone.Naquin@nrc.gov>

Subject: FYI & Query: ISG-12, 10 CFR Part 70, Appendix A - Reportable Safety Events

Importance: High

Hi Margie

FYI: A question has come up about ISG-12 ([ML14157A067](#)) and an issue with GNFA that I would like to get your input on.

Approximately every calendar quarter, GNFA staff conduct maintenance on their riser for the fire suppression system. According to the licensee, the maintenance is a matter of a few hours and they establish compensatory measures during this period, to include limiting combustibles in the area and posting a fire watch. The fire suppression system is not an IROFS.

New Hanover County would be responsible for and respond to any reports of fire on the GNFA site. The Fire Chief for New Hanover County has requested a courtesy notification (e.g, email or phone call) from GNFA whenever the maintenance is performed. GNFA is seeking clarification on whether this new request would require a concurrent report to the NRC every time the email or telephone notification to the Fire Chief is made for this quarterly maintenance activity.

Based on my reading of FCSS-ISG-12, Rev. 1, Section 3.5, "Concurrent Reports," I don't believe this routine maintenance activity and the new courtesy notification to the Fire Chief meets the criteria for a concurrent report to the NRC. However, this example is not specifically called out in Section 3.5.2, "Other Government Notifications," and thus is left to interpretation and uncertainty for the licensee. The conservative response would be for GNFA to notify the NRC (i.e., Headquarters Operations Center) every quarter when the maintenance activity occurs and the Fire Chief is provided a courtesy notification, but I don't think it is necessary or an appropriate use of licensee and NRC resources.

Query:

What is your opinion on this specific issue?

Considering ISG-12 was first issued in 2010 and Rev 1 issued in 2014, should we consider engaging industry on this and see if there is a need to provide further clarification?

Thanks,

Jake

Jacob I. Zimmerman, Chief

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