

Regulatory Docket File

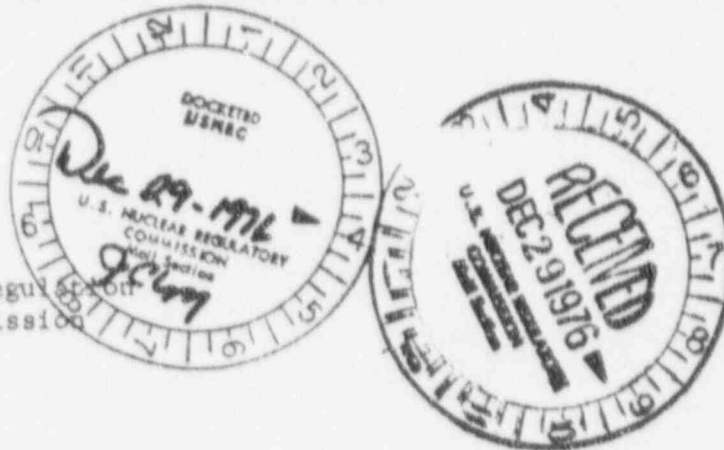
NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS, MINNESOTA 55401

December 27, 1976

Mr Ben C Rusche, Director
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555



Dear Mr Rusche:

Docket No. 50-263	License No. DPR-22
50-282	DPR-42
50-306	DPR-60

Annual Operating Report Format

Your letter dated December 1, 1976 transmitted a model Annual Operating Report format. You requested that we review the proposed format to determine if it is an appropriate model for our 1976 Annual Operating Report and advise you if we will submit our 1976 report in conformance with that format.

We are deeply disturbed by the apparent increase in, and duplication of, reporting that would be created by the adoption of the proposed format for Annual Operating Reports. Early this summer, the Atomic Industrial Forum, Inc., (AIF) distributed to a number of licensees a copy of a draft format for Annual Operating Reports that had been conveyed to the AIF by the NRC for comment. The format included amplification and repetition of information that is already docketed with the NRC. We, and a number of other utilities, responded to AIF with extensive comments on this proposed expansion in reporting. In July, 1976 utility and AIF representatives met with the NRC and discussed these comments in detail. It was our understanding that the NRC acknowledged most of these comments as being reasonable requests for elimination of duplicative reporting. We did not, as implied in your letter, agree that the Annual Operating Report should "include all the suggested information" contained in the originally proposed format. The latest format, transmitted with your letter of December 1, 1976 is not significantly different from the original.

Regulatory Guide 1.16 has undergone four revisions over a two-year period, the latest being Revision 4 which was issued in August, 1975. Under the Regulatory Guide Discussion section, it states that the revisions "...reflected results of a staff review of operating information needed to permit assessment by the Commission of safety-related activities during the operating phase of plant life".

The latest Regulatory Guide revision contains very specific information on the content of the Annual Operating Report. We, along with other licensees, were asked to submit proposed technical specifications for the reporting of operating information based upon Regulatory Guide 1.16. License Amendments were issued on

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January 22, 1976 and January 23, 1976 for the Monticello and Prairie Island Plants respectively, which incorporated the reporting that is detailed in Regulatory Guide 1.16, Revision 4. The safety evaluation accompanying these license amendments stated, "The proposal would formalize present reporting and would delete any reports no longer needed for assessment of safety-related activities."

With this background, it is very disturbing to receive a format for the Annual Operating Report which deviates substantially from regulatory guidance and the technical specification requirements. This is particularly displeasing when the effort appears to be an addition to the already burdensome reporting requirements to, and extensive requests for information from, the NRC. It also appears to be inconsistent with statements by NRC Commissioners on the progress in reducing reporting requirements and submission of duplicative information. We fail to see how the additional information can be productively utilized for the assessment of safety-related activities.

The following are items requested in the Annual Operating Report format that are above and beyond current technical specification annual reporting requirements (Regulatory Guide 1.16) and which have already been docketed by the licensee as a result of other requirements: amendments to facility license or technical specifications; facility or procedure changes which required NRC approval; tests and experiments which required NRC approval; a listing of all Licensee Event Reports; and electric power generation and unit shutdown and forced power reduction data. Most of this information is already collected and retrievable through the NRC Management Information and Program Control data bank or published and given wide distribution on a monthly basis (i.e., Graybook and LER listing). Other information that is recommended by the suggested format to be included in the Annual Operating Report, but which is not contained in our technical specifications or in Regulatory Guide 1.16, is as follows: a table of corrective maintenance of safety-related equipment (this was eliminated from our technical specification by the January License Amendment based upon Regulatory Guide 1.16); the results of Eddy Current testing and other surveillance tests (exception reporting for tests which fail to meet acceptance criteria already exists under the Reportable Occurrence requirements--we strongly object to reporting of successful surveillance tests); loss of condenser capability and failed turbine assemblies, none of which is considered to be safety-related equipment nor is required to be reported as a Reportable Occurrence; and information on plant organization and personnel.

We are particularly disheartened by the prospect of another Regulatory Guide being issued covering the content of the Annual Operating Report when we already have "standardized" reporting requirements in Regulatory Guide 1.16, Revision 4 and which have been reflected in the technical specifications. There has not been much of an opportunity for licensees to submit Annual Operating Reports under the provisions of their new technical specifications based upon the August, 1975 revision to Regulatory Guide 1.16.

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We offer the following information in response to your question as to the format of our 1976 Annual Operating Report submittal. Shortly after the issuance of the new reporting requirement technical specifications in January, 1976, we issued a letter to the Monticello and Prairie Island Plants which explained the new reporting requirements. In regard to the Annual Operating Reports, the letter said, "it is suggested that you examine these requirements in detail so that you can set up the required formats as early as possible for keeping track of the information during 1976; then, at the end of the year you will have minimum difficulty in extracting the information that is needed for the Annual Operating Report". On November 16, 1976 we issued a letter to both nuclear plants which outlined the format and content of the Annual Operating Report. This would allow the plant personnel to begin assembling the necessary information to allow a more flexible scheduling of work priorities prior to the required submittal date. The format we selected is as follows:

- i Title Page
- ii Table of Contents
- I Narrative Summary of Operating Experience - Units 1 and 2
- II Outages and Forced Power Reductions - Units 1 and 2
- III Number of Personnel and Man/rem Exposure by Work and Job Function
- IV Fuel Performance
- V Changes, Tests and Experiments (Annual 50.59(b) reporting)
- VI Miscellaneous (other technical specification unique reporting requirements)

We asked the plant to provide the exact information under each item as contained in the technical specifications.

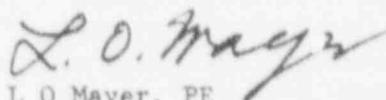
In summary, we are now subjected to a steadily increasing and duplicative reporting burden. As licensees for two nuclear plants, we transmitted 266 separate reports to the NRC in 1975 (307 already in 1976), almost all of which consisted of 40 copies of multi-page reports. We believe that the NRC should allow several years of reporting under the current "standardized" technical specification requirements to determine whether any additional information is needed for the assessment of safety-related activities. We believe that it would be inappropriate, at this point, to revise the directions that were issued to our plant personnel in February and November, 1976 for preparation of the

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Annual Operating Report; therefore, we will submit these reports on the basis of the outline listed above and which is in full conformance with the technical specification requirements.

Yours very truly,



L O Mayer, PE
Manager of Nuclear Support Services

LOM/ak

cc: J G Keppler
MIPC
G Charnoff
MPCA
Attn: J W Ferman
AIF
Attn: Ron Burdge

50-283/282/306

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Minneapolis Minnesota 55401
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12-27-76DATE RECEIVED
12-29-76☒ LETTER
☐ ORIGINAL
☒ COPY☐ NOTORIZED
☒ UNCLASSIFIED

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NUMBER OF COPIES RECEIVED

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DESCRIPTION Ltr. Ref our 12-01-76 ltr furnishing information from NSP Annual Operating Report... ENCLOSURE

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ACKNOWLEDGEDPLANT NAME: MONTICELLO
PRAIRIE ISLAND UNITS 1 & 2

SAFETY

FOR ACTION/INFORMATION

ENVIRO

Jcm 12-29-76

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