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William S. Orser
Senior Vice President

Detroit
Edison

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5201

James Shapake

57 FR 27394

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David L. Meyer
U. S. Nuclear Regulatory Commission
Chief, Rules and Directives Review Branch,
Division of Freedom of Information and
Publications Services, Office of Administration
Washington, DC 20555

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC Licensee No. NPF-43
 - 2) Comments on Review of Reactor
Licensee Reporting Requirements
(57 FR 27394, June 19, 1992)
 - 3) Comment Period Extended
(57 FR 34486, August 7, 1992)

Subject: Comments on Reactor Licensee Reporting Requirements

On June 19, 1992, the NRC issued for public comment, "Review of Reactor Licensee Reporting Requirements". The NRC staff is seeking comment from licensees in connection with all reporting requirements (e.g., 10 CFR, Regulatory Guides, Technical Specifications). This review was conducted in response to a request from the chairman of the NRC.

Attached are Detroit Edison's comments and suggestions concerning this NRC effort to reduce the burden of reporting requirements. Detroit Edison supports this effort. Detroit Edison also supports the NUMARC comments submitted on behalf of the industry.

Should you have any questions concerning the attached comments, please call Mr. Joseph Pendergast, Compliance Engineer at (313) 586-1682.

Sincerely,

William S. Orser

Attachment

cc: T. G. Colburn
A. B. Davis
M. P. Phillips
S. Stasek
Region III
NUMARC

USNRC
OFFICE OF ADMINISTRATION

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Fax Rec'd 5-30-92 11:00 am

NRC Committee to Review Generic Requirements (CRGR) Comments

Detroit Edison agrees with the Committee to Review Generic Requirements on 10 CFR part 50 regulations. The CRGR recommended four rulemaking actions are:

- 1) Change the frequency of safety analysis report updates from once each year to once each refueling cycle (10 CFR 50.71). This has been approved in Federal Register 57 FR 39353, dated August 31, 1992.
- 2) Change the frequency of reporting changes at power reactors from once each year to once each refueling cycle (10 CFR 50.59(b)). This has been approved in Federal Register 57 FR 39353, dated August 31, 1992.
- 3) Eliminate certain Licensee Event Reports (10 CFR 50.72 and 10 CFR 50.73).
- 4) Change the frequency of reports on power reactor radiological effluents from twice each year (10 CFR 50.36a) to once each year.

In addition, Detroit Edison recommends the following changes to the reporting requirements.

Suggested changes to 10 CFR

- 1) 10 CFR 73.71(b)(1) requires 1-hour NRC notification for certain security events. Other security events of less safety significance are required to be logged in the safeguards event log and submitted to the NRC every three months. 10 CFR 73.71(b)(1) should have 1-hour notification for significant security events that actually occurred or require prompt notification. Other security events of less significance will be logged in the safeguards event log which is maintained by the licensee and available for NRC review during routine inspections. Unless there is an unseen practical use the NRC makes of the log information, the requirement to submit the log quarterly should be eliminated.
- 2) 10 CFR 50.72(b)(1) requires 1-hour notification for "Non-Emergency events". Detroit Edison suggests that since these events are "non-emergency" then there would be little or no safety impact if these events were reported as 4-hour notifications. A 4-hour notification would provide additional time to better assess the significance of the event.
- 3) With respect to the reporting requirements of 10 CFR 50.72 and 10 CFR 50.73, Detroit Edison recommends that the NRC continue to work with the General Electric Boiling Water Reactor Owners Group to resolve comments on NUREG 1022 Revision 1.

- 4) 10 CFR 50.46(a)(3)(ii) states that with respect to ECCS cooling performance analysis that for each change to or error discovered in an acceptable evaluation model or in the application of such a model that affects the temperature calculation, the applicant or licensee shall report the nature of the change or error and its estimated effect on the limiting ECCS analysis to the Commission at least annually as specified in 50.4. If the change or error is significant, the applicant or licensee shall provide this report within 30 days and include with the report a proposed schedule for providing a reanalysis or taking other action as may be needed to show compliance with 50.46 requirements. Any change or error correction that results in a calculated ECCS performance that does not conform to the criteria set forth in 10 CFR 50.46(b) is a reportable event as described in 10 CFR 50.72 and 10 CFR 50.73. Therefore, the requirements of 50.46(a)(3)(ii) are redundant and should be considered a candidate for elimination.
- 6) 10 CFR 26.71(d) requires a semi-annual report of the Fitness-For-Duty program performance. Detroit Edison suggests that this be made an annual report.

Suggested changes to the Technical Specifications

In general Detroit Edison suggests deletion of all special reports not required by the improved Technical Specifications. Licensee Event Reports would be required if any appreciable safety significance were the issue. Resident inspectors review plant Deviation Reports and Limiting Condition for Operation entries.

Suggested changes to Regulatory Guide 1.16

The Annual Operating Report submitted in accordance with Regulatory Guide 1.16 is required to contain information redundant to the Monthly Operating Report, submitted in accordance with Regulatory Guide 1.16. The reports both contain summaries of unit shutdowns and power reductions. The Annual Operating Report and Monthly Operating Report also contain information in the unit shutdown and power reduction section that has usually been provided via the Licensee Event Report system. Regulatory Guide 1.16, section 1.b., "Annual Operating Report" states "...some repetition of previously reported information may be involved." These two reports should not contain the same information.

Suggested changes to the Operating License

Appendix B of the Fermi 2 operating license, "Environmental Protection Plan (non-radiological)" section 3.2 requires reporting related to the NPDES permits and state certification shall be reported to the NRC within 30 days following the date the change or renewal is approved. This information could be supplied with the Annual Environmental Operating Report.