



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 7 1985

MEMORANDUM FOR: William J. Dircks
Executive Director for Operations

FROM: Robert B. Minogue, Director
Office of Nuclear Regulatory Research

SUBJECT: CONTROL OF NRC RULEMAKING: RES INDEPENDENT REVIEW
OF ONGOING RULEMAKING SPONSORED BY NMSS

Based on our independent review of the ongoing rulemaking, "Reporting Requirements for Safeguards Events," (10 CFR Part 73), sponsored by NMSS, RES agrees with the recommendations of the Director, NMSS, that this rulemaking effort should continue.

The basis for our recommendation is as follows:

The proposed revision of 10 CFR 73.71 would redefine the reportable safeguards events in less abstract terms to aid the licensee in responding to NRC requirements, remove the current 24-hour telephone notification requirements for certain safeguards events and specify that written reports must be prepared on Form NRC-366 (with safeguards supplement). The proposed rule would also add a new Appendix G to 10 CFR Part 73 to identify all events of significance that must be reported within one hour and other events that must be recorded in a quarterly-submitted safeguards event log.

The staff has found that reports submitted pursuant to 10 CFR 73.71 were non-uniform and thereby difficult to analyze and correlate relative to NRC assessment needs. Unless the reporting requirements are clarified, the usefulness of such reports in developing an adequate data base for generic analysis is limited. The primary benefit of the rule change will be the improved data base for NRC use in assessing both plant specific and generic security systems at licensed nuclear power plants. The improved reporting of safeguards events will enable NRC to better identify and initiate corrective actions as may be required to eliminate unacceptable shortcomings in a timely manner and thereby improve protection of such facilities. Additionally, the elimination of unnecessary reporting which will contribute to a decrease in cost to the NRC of \$25.2K/yr and to the licensees a decrease of \$658.2K/yr industry wide.

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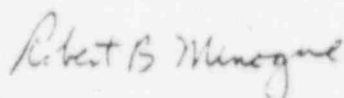
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The alternative of doing away with requiring the reporting safeguards events was not considered since such reporting is believed to be necessary for ensuring adequate safeguards security systems and the associated protection of public health and safety.

The rulemaking is consistent with applicable policies and planning guidance and is a matter of moderate urgency relative to accomplishing the NRC's mandate of protecting nuclear material and facilities.

Sufficient information has been provided in relation to these factors to warrant further development of this specific rulemaking.

The complete RES independent review package has been sent to OEDO (Attention: DEDROGR) and to the Director, NMSS. This package includes some suggested changes in the supporting documentation which we believe will improve the quality of the proposal.



Robert B. Minogue, Director
Office of Nuclear Regulatory Research

AB46-1

RES REVIEW PACKAGE

ROUTING AND TRANSMITTAL SLIP		Date
TO: (Name, office symbol, room number, building, Agency/Post)		Initials
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1.	O. E. Bassett, Member, RIRB	
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<input checked="" type="checkbox"/> Action	File	Note and Return
<input type="checkbox"/> Approval	For Clearance	Per Conversation
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REMARKS

We are at step III.C.2, "RIRB deliberations," of the RES independent review procedures for the attached specific ongoing rulemaking.

Please evaluate the attached draft independent review package and provide RAMRB with your voting sheet indicating your position on the rulemaking.

Your response by c.o.b. will assist in RES' making independent recommendations to the EDO in a timely manner.

"Reporting Requirements for Safeguards Events"

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
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