



PO Box 1551
411 Fayetteville Street Mall
Raleigh NC 27602

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March 19, 2004

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

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69FR 7661

(1)

**Subject: Comments on Notice of Clarification to Steam Generator Tube Integrity
Event Reporting Guideline in NUREG-1022, "Event Reporting
Guidelines 10 CFR 50.72 and 50.73" (69 FR 7661; February 18, 2004)**

Ladies and Gentlemen:

The subject Federal Register notice indicates that the NRC intends to issue errata to NUREG-1022, Revision 2 to ensure that the NRC receives timely notification of serious steam generator tube degradation. In particular, the clarification changes the event reporting criteria for a Degraded or Unanalyzed Condition in Section 3.2.4(A)(3). The notice did not indicate whether the new criteria would require the re-evaluation of the reportability of an existing steam generator tube degradation that was previously evaluated based on the criteria that were in effect before issuance of the errata.

We suggest that a retroactive application of the new event reporting criteria to previously evaluated events would add burden to the licensees but would not provide timely notification to the NRC.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

Tony Groblewski
Supervisor - Regulatory Affairs

HAS

E-RFDS = ADM-03

Call = S. Lee (SSL)

Ken Karwoski (KSK1)

Template = ADM-013