



Additional Reporting Requirements of 10 CFR 70.74

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Statement of Problem

- Reportable events listed in Appendix A of 10 CFR Part 70
- Appendix A replaces existing reporting requirements (e.g., NRC Bulletin 91-01)
- Different parts of Appendix A become applicable at different times:
 - October 18, 2000
 - Upon complete submittal of ISA Summary
- Different schedules for submitting partial/complete ISA Summaries
- Need to clarify when various reporting requirements of Part 70 are applicable
- NOTE: *Guidance letters sent to individual Part 70 licensees in early 2001*



Additional Reporting Requirements

- Summary of 10 CFR Part 70, Appendix A requirements:
- After October 18, 2000:
 - (a)(1): inadvertent nuclear criticality
 - (a)(2): acute intake of 30 mg soluble uranium
 - (b)(4): natural phenomenon/external event that has affected or may have affected the safety function, availability, or reliability of an IROFS
- Upon complete submittal of the ISA Summary:
 - All other provisions.
- “Complete submittal” = ISA Summary including the entire facility with all licensed processes, pursuant to 10 CFR 70.62(c)(3)(ii).



NRC Bulletin 91-01

- Requires reporting of events involving the loss of double contingency control (in response to 1991 GE Event)
- Remains in effect until:
 - complete submittal of the ISA Summary; and
 - NRC licensing action to delete existing commitments to Bulletin 91-01
- Between October 18, 2000 and NRC licensing action (following complete submittal of ISA Summary):
 - Both Bulletin 91-01 and paragraphs (a)(1), (a)(2), and (b)(4) of Part 70 Appendix A apply
 - Single report sufficient if same event reportable under Appendix A ((a)(1) or (b)(4)) and Bulletin 91-01
- New facility: all provisions of Appendix A apply upon licensing.



Conclusions

- Existing reporting requirements remain in effect until NRC licensing action (following complete submittal of the site-wide ISA Summary)
- Some Appendix A reporting requirements already in effect
- Remaining Appendix A reporting requirements will take effect upon complete (not partial) submittal of ISA Summary, no later than October 18, 2004
- Many existing provisions of Bulletin 91-01 subsumed under Appendix A