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57 FR 27394

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6/19/92  
USNRC  
OFFICE OF ADMINISTRATION

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September 30, 1992 '92 OCT 13 P2:02

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

Subject: NRC Reporting Requirements

Dear Mr. Meyer:

Con Edison is pleased to provide comments in response to the NRC Request for Public Comment concerning licensee reporting requirements, which appeared in the Federal Register dated June 19, 1992 (57 FR 27394). In that request, comments were invited regarding reduction or elimination of some reporting requirements to relieve unnecessary burdens on power reactor licensees without reducing protection for public health and safety. In a letter dated July 29, 1992 from Mr. W. T. Russell (NRC) to Mr. Thomas E. Tipton (NUMARC) the comment period was extended to September 30, 1992.

We applaud this NRC initiative, and hope that the NRC's regulations and guidance will be changed to reduce substantially the burden of preparing and submitting reports that do not contribute to the protection of the public health and safety and the common defense and security.

Our specific comments regarding certain reporting requirements are based on their perceived impact on Indian Point Unit 2.

In Attachment 1, specific reports are identified which we feel are good candidates for NRC review as to the value of their content for regulatory purposes. Estimates of the resources needed to produce some of these reports for Indian Point Unit 2 and suggestions for burden reduction are included. With these suggestions alone, over one man-year of effort could be saved at Indian Point Unit 2.

Although we can identify costs or burdens of satisfying the many NRC reporting requirements, we can not be certain of the value derived or the use made of these reports by the NRC. We therefore urge the NRC to review the complete list of reporting requirements compiled by NUMARC and to prioritize them from a value/impact perspective. The goal should be

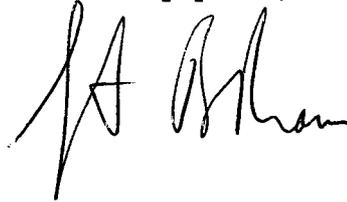
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simplification, consolidation, reduction or elimination of as many reporting requirements as possible while still maintaining regulatory efficiency and protection of the public health and safety. The NRC's considerations in this regard should also recognize that significant amounts of data will continue to be accessible through Resident Inspector requests and inquiries, thereby reducing the need for submittal of formalized reports.

We also endorse the comments being submitted this week by the Nuclear Management and Resources Council (NUMARC).

Should there be any questions regarding these comments, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety & Licensing, at (914) 526-5127.

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'J. M. Evans', written in a cursive style.

bcc: J. M. Evans  
J. Eaton, NUMARC  
File NM-92-172

ATTACHMENT 1

In this Attachment, specific reports are identified for which we recommend elimination, reduction in frequency, or simplification or reduction of content. The Table below summarizes the potential annual savings estimated for Indian Point Unit 2 if these recommendations were implemented, to the extent that we are able to quantify.

SUMMARY OF ESTIMATED POTENTIAL ANNUAL SAVINGS IN MAN-WEEKS

<u>Report</u>	<u>Elimination</u>	<u>Frequency Reduction</u>
Radioactive Effluent Release Report	N/A	13
Personnel Exposure and Monitoring Report	N/A	8
Fitness for Duty Program Performance Data	6	3
Inservice Inspection Report of Results	2	N/A
Updated Final Safety Analysis Report	N/A	17
Report of Changes, Tests and Experiments	17	9
	—	—
Total	25	50

## RADIOLOGICAL REPORTS

### Radioactive Effluent Release Report

Reference: 10 CFR 50.36 and Technical Specifications

We agree with the recommendation of the NRC Committee to Review Generic Requirements that the frequency of this report should be changed from twice each year to once each year. We estimate that this reduction would save approximately three man-months of effort each year for Indian Point Unit 2. Along with NUMARC, we further recommend that the NRC assess the value of the scope of information required for this report, and retain the requirement only for information whose value has been demonstrated by experience.

Estimated Annual Savings From Frequency Reduction:  
13 man-weeks

### Radiological Environmental Operating Report

Reference: Technical Specifications

We recommend, as above, that the NRC assess the value of the scope of information called for in this report, and eliminate the requirement for any information whose value has not been demonstrated by experience.

### Personnel Exposure and Monitoring Report

Reference: 10 CFR 20.407 and NRC Regulatory Guide 1.16

This is an annual report whose value we recognize. However, we recommend that the NRC review the need for the detailed categorization of exposure data by work activity, occupation and employer type. The delay of typically two years between NRC receipt of this data from individual licensees and publication in NUREG 0713 suggests that the NRC may not view this compilation as a high priority. We estimate an expenditure of approximately two and one-half man-months per annual report for Indian Point Unit 2. Much of this could be saved by reduction in the required complexity of this report.

Estimated Annual Savings From Complexity Reduction:  
8 man-weeks

## SECURITY

### Safeguards Event Log Entries Report

Reference: 10 CFR 73.71

We endorse NUMARC's recommendation to eliminate this report. However, if the NRC decides to retain a reporting requirement, then we recommend that the required reporting frequency be reduced from four times each year to the same frequency as the Fitness For Duty submittal required by 10 CFR 26.71(d). This frequency is currently twice each year, but is recommended below to be changed to once each year. We note that there exists typically a six to nine month interval from NRC receipt of the Safeguards Event Log Entries Report from individual licensees to NRC's publication of compiled data. This suggests that timeliness would not be adversely impacted in a significant way by annual or semi-annual rather than quarterly reporting. In addition, evaluation of trends is more meaningful when based on events over six months or a year rather than only three months.

### Fitness For Duty Program Performance Data

Reference: 10 CFR 26.71(d)

We endorse NUMARC's recommendation to replace this reporting requirement with a record retention requirement. However, if the NRC decides to retain a reporting requirement, we recommend a reduction in amount of data and reporting frequency. During program start-up, this report served a useful purpose by facilitating inter-utility comparisons. This aided the establishment of consistent, high-quality programs. However, since this program has now been in effect for several years we recommend that the NRC evaluate the utility of the data required to be reported, and eliminate the requirement to report any information not found to be of continuing value. If the reporting requirement is retained, the change in report frequency from twice each year to once each year would be appropriate and is recommended. We estimate approximately three man-weeks for each preparation of this report for Indian Point Unit 2.

Estimated Annual Savings From Elimination: 6 man-weeks

Estimated Annual Savings From Frequency Reduction:

3 man-weeks

## TESTS AND INSPECTIONS

### Inservice Inspection Report of Results

Reference: 10 CFR 50.55a and ASME Boiler and Pressure Vessel Code paragraph IWA-6230

We endorse NUMARC's recommendation that this report requirement be eliminated. We see no evidence of significant NRC review or utilization of this report, and the inspection results are available and auditable at the plant site. We estimate approximately two man-weeks for the preparation of this report for Indian Point Unit 2.

Estimated Annual Savings From Elimination: 2 man-weeks

#### Integrated Leak Rate Test Report

Reference: 10 CFR 50 Appendix J and Technical Specifications

We recognize the value of preparing an overview summary report of the voluminous data resulting from this test. However, we are not aware of NRC review or use of this report. We recommend that the reporting requirement be changed to a record retention requirement. The test results will remain available and auditable at the plant site.

#### DESIGN CHANGES

##### Updated Final Safety Evaluation Report (UFSAR)

Reference: 10 CFR 50.71

We agree with the recommendation of the NRC Committee to Review Generic Requirements to reduce the frequency of this report from once each year to once each refueling cycle. Since the majority of plant modifications, and especially safety related ones, are made during refueling outages, an update frequency the same as the refueling frequency is more appropriate and efficient. We estimate that the preparation of this update utilizes approximately eight man-months for Indian Point Unit 2. Because our fuel cycle is twenty-four months, annual savings from this change would be four man-months.

Estimated Annual Savings From Frequency Reduction:  
17 man-weeks

##### Report of Changes, Tests and Experiments

Reference: 10 CFR 50.59b

We endorse the NUMARC recommendation to consider elimination of this report due to its redundancy with the FSAR update. However, if the NRC decides to retain this reporting requirement, we recommend a reduction in the amount of information and frequency of the report. The length of the report can be reduced without reducing its value by establishing a threshold which would require inclusion of only those changes, tests and experiments having safety significance. In addition, we agree with the recommendation of the NRC Committee to Review Generic Requirements to reduce

the frequency of this report from once each year to once each refueling outage. The reason for this change in frequency is the same as that for the UFSAR discussed above. We estimate that the preparation of this report utilizes approximately four man-months for Indian Point Unit 2. Because our fuel cycle is twenty-four months, annual savings from the frequency change would be two man-months.

Estimated Annual Savings from Elimination: 17 man-weeks  
Estimated Annual Savings From Frequency Reduction:  
9 man-weeks