

SUSAN PERKINS-GREW

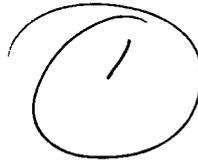
Senior Director, Emergency Preparedness
and Risk Assessment

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8016
spg@nei.org
nei.org



NUCLEAR ENERGY INSTITUTE

5/2/2014
79FR 25158



RECEIVED

2014 MAY 27 PM 12:00

RULES AND DIRECTIVES
BRANCH
USNRC

May 23, 2014

Ms. Cindy K. Bladey
Office of Administration
Mail Stop: 3WFN, 06-44M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Draft NUREG-1022, "Event Reporting Guidelines: 10 CFR 50.72(b)(3)(xiii)," Revision 3, Supplement 1 (*79 Federal Register 25158*, Docket ID NRC-2011-0237)

Project Number: 689

Dear Ms. Bladey:

The Nuclear Energy Institute (NEI)¹ and the industry hereby submit the attached comments pursuant to Federal Register notice, "Event Reporting Guidelines," *79 Fed. Reg. 25158*, dated May 2, 2014.

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM -03

Add=

A. Lewin (AXLH)

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Ms. Cindy K. Bladey
May 23, 2014
Page 2

Please contact David Young at (202) 739-8127; dly@nei.org if you require information concerning these comments.

Sincerely,



Susan Perkins-Grew

Attachment

c: Mr. Robert E. Kahler, NSIR/DPR/IRIB, NRC
Mr. Stephen F. LaVie, NSIR/DPR/IRIB, NRC
Mr. Aron Lewin, NRR/DIRS/IRIB, NRC
NRC Document Control Desk

**NEI and Industry Comments on “Event Reporting Guidelines”
(Material in NEI 13-01)**

Change to RAL 3.1, Table B1, statement “b.”

Change to read, “The capability to perform EMERGENCY ASSESSMENT was not restored within the RESTORATION TIME specified in Table B1-1.”

Add to Basis for Table A

“The inability to assess EALs at an ERF is evaluated in accordance with Tables B1 and B2, since this is a sub-function of EMERGENCY ASSESSMENT (e.g., the loss of a computer system that displays plant data). Table A primarily addresses the loss of a plant structure or piece of equipment that provides a parameter value or other information necessary for an EAL assessment (e.g., a tank level instrument or a radiation monitor).”

Add to Basis for Tables B1 and B2

“The inability to obtain a parameter value or other information necessary to perform an emergency classification or RADIOLOGICAL ASSESSMENT due to the loss of a structure or piece of equipment in the plant is assessed in accordance with Tables A and C (i.e., the datum source such as a tank or radiation level is unavailable). Tables B1 and B2 are evaluated when an ERF computer system used to collectively acquire, process or display data used for EMERGENCY ASSESSMENT, including emergency classification or RADIOLOGICAL ASSESSMENT, is affected.”

Add bracketed text to Basis for Tables B1 and B2

“As used in these Tables, an inability to perform EMERGENCY ASSESSMENT should not be assumed to have occurred simply because a structure or equipment design parameter is exceeded or feature nonfunctional. Rather, the decision should be based on whether or not ERO personnel could effectively perform EMERGENCY ASSESSMENT functions within the facility, using the equipment and data available. This decision should consider both the ability to activate the facility as well as the capability for protracted operation under emergency conditions. [For example, the loss of a facility’s protected ventilation system would not preclude the ability to perform EMERGENCY ASSESSMENT provided that procedures described contingency measures that could be implemented in the event of a radiological release.]”

Add bracketed text to Basis for Tables B1 and B2

“The availability and temporary use of an ALTERNATE FACILITY is a consideration in both Tables B1 and B2. An acceptable ALTERNATE FACILITY must meet the requirements of 10 CFR 50, Appendix E, sections IV.E.8.a and 8.c. An “alternative facility,” established in accordance with Appendix E section IV.E.8.d, may be considered an ALTERNATE FACILITY for reporting assessment purposes if it also meets the applicable requirements of sections IV.E.8.a and 8.c. [An ALTERNATE FACILITY need not meet the same design or operating requirements applied to a normally used ERF (e.g., it may not possess a protected ventilation system.)]

A report is not required if the lost capability affects only an ALTERNATE FACILITY, and the primary ERF remains available.”