

From: [Morris, Scott](#)
To: marvlewis@juno.com
Subject: Response to Your July 8 2014 email to NRC Chairman Macfarlane
Date: Wednesday, August 27, 2014 6:03:24 PM
Attachments: [image001.png](#)

Dear Mr. Lewis,

I am writing in response to your email to Chairman Macfarlane dated July 8, 2014, in which you questioned the U.S. Nuclear Regulatory Commission's (NRC's) processes and procedures for reactor licensee event reporting. As you likely already know, the NRC requires formal (verbal and written) reports to be submitted per 10 CFR 50.72 and 50.73 in order for the staff to be made aware of events where Commission action may be needed to maintain or improve reactor safety, or to respond to heightened public concern. Because rule language cannot be precise enough to cover all of the potential situations that might be governed by a rule, supporting regulatory guidance documents are typically needed. NUREG-1022, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73," is just such a document and contains guidelines that the NRC staff considers acceptable for licensee use in meeting the requirements of 10 CFR 50.72 and 50.73. Much of the guidance found in NUREG-1022 has been in effect for over thirty years and we have confidence that it continues to ensure that sufficient information is provided to the NRC in order to carry out its safety mission.

Thank you for your input and your continued interest in the NRC's regulatory process.

Sincerely,

Scott A. Morris

Director, Division of Inspection & Regional Support

U.S. Nuclear Regulatory Commission / Office of Nuclear Reactor Regulation

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Marv Lewis <marvlewis@juno.com>

Tuesday, July 08, 2014 9:28AM

CHAIRMAN Resource; Lewin, Aron; et@propl.org; best@matrr.org; arjun@ieer.org; babsjewell@yahoo.com; catalyst@actionPa.org; dianed@nirs.org; gretel@bestmatrr.org; kitbob@erols.com; kevin@beyondnuclear.org; Lois@ieer.org; michaelbft48@comcast.net; nukenet@energyjustice.net; nirsnet@nirs.org; phyllis.criswell@gmail.com; paul@beyondnuclear.org; russell.honicker@gmail.com; RulemakingComments Resource; radwaste@rwma.com; traci@energyjustice.net

Don't tell?

The Honorable Allison MacFarlane,
Dear Chairman,

Mr Aron Lewin helped me greatly by giving me the bridge line and password to listen to the 7-3-14 public meeting on the changes contemplated for 10 CFR 50.72(b)(3)(xiii) in 79FRN 25158158 of May 2, 2014. This change would put draft Nureg 1022 Revision 3, of September 1 "Event Reporting Guidelines" as the 'go to' guidelines for telling what is wrong with an operating nuclear power plant to the NRC. Draft Nureg 1022 is 100 + pages on what should be reported and what can be left unreported. In this day when Government goes to extraordinary lengths to obtain data and information, the chance that a regulatory guidance that emphasizes withholding data and information should be promoted to a 'go to' reference is contradictory to good practice on its face. The NRC should attempt to get as much data and information reported to itself as possible. Considering computer capabilities, archiving electronically is attractive, easy and inexpensive. Making this data available to all comers would promote safety. Hiding this data would promote the worst performers. Which does the NRC prefer: Promoting safety or the worst performers?

Respectfully submitted,
Marvin Lewis, P. E. (Retired.)
7-8-2014.