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SUBJECT: Comments on draft rev 1 to NUREG-1022. Encourages NRC to work w/industry to develop comprehensive program that will fulfill collective needs.

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Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON DRAFT REVISION 1 TO NUREG 1022
PLA-3721 FILE A17-11

Dear Mr. Meyer:

Pennsylvania Power and Light Company has participated as an active member of the BWR Owners' Group (BWROG) subcommittee on Operability/Reportability. As a result, we endorse the detailed comments on Revision 1 to NUREG 1022 provided by the BWROG. In addition, we believe that due to the significant changes contained in this revision to NUREG 1022, several general comments are appropriate.

Of particular concern is the approach presented to reporting of engineering and design related conditions. Such conditions are often discovered during engineering reviews or design bases reconstitution efforts. These efforts are undertaken by utilities as initiatives to develop valuable reference documents to support various plant activities and to enhance existing design control and configuration management practices. These efforts will identify many questions, concerns, cases of missing information and potential discrepancies. Experience indicates that the vast majority of these issues have little or no safety significance, are routinely dispositioned by utilities, and represent issues of little applicability to other utilities. Establishing a threshold for reporting these conditions that focuses on potential issues, applies to deviations in documentation and is geared at individual components will significantly increase the number of ENS phone call reports and LERs with little commensurate increase in plant safety. To the contrary, we believe that establishing a low threshold as contained in Revision 1 to NUREG 1022 will distract NRC and industry from issues of true safety significance by diluting the LER database and further taxing existing NRC and industry resources.

The product of the NRC's reevaluation of reportability guidance is strikingly different from the industry concerns that initiated it (i.e., the 1989 Regulatory Impact Survey). Therefore, it is evident that the NRC has developed overriding concerns on reporting. The result appears to evolve the LER system toward a broader role as an operating experience program. PP&L strongly endorses the need for an effective, industry-wide operating experience program. However, the LER

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system is, and should continue to be only one input. We encourage the NRC to work with industry to develop a comprehensive program that will fulfill our collective needs. Excessive reporting is an inappropriate means to achieve this objective; it undermines the trust of our publics and diverts resources from activities of greater safety significance.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)
Mr. J. J. Raleigh, NRC Project Manager - OWFN
Mr. G. S. Barber, Sr. Resident Inspector - SSES



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