

March 22, 1994

MEMORANDUM FOR: Theodore R. Quay, Director
Project Directorate V
Office of Nuclear Reactor Regulation

FROM: Patrick W. Baranowsky, Chief
Trends and Patterns Analysis Branch
Division of Safety Programs
Office for Analysis and Evaluation
of Operational Data

SUBJECT: REPORTING MULTIPLE FAILURES AND RELATED EVENTS AT WNP-2
UNDER 10 CFR 50.73

This memo is in response to a note from Jim Clifford, NRR/PDV, concerning questionable reporting practices under 10 CFR 50.73 at WNP-2.

In LER 397/93-010, Revisions 0 through 5, the licensee is assuming a flexibility in reporting that is not appropriate. Over an extended period of time (two years), the licensee has utilized LER revisions to report events, such as conditions prohibited by Technical Specifications, which were discovered as a result of discovering inadequate test procedures in a "surveillance improvement program".

The WNP-2 practice is based on the guidance in NUREG-1022, Supplement 1, Answers to Questions 14.13 and 14.14. This guidance was intended to cover an activity such as an outage or test program lasting on the order of several weeks (Answer 14.13) or 60 days (Answer 14.14). The guidance was not intended to cover activities lasting for extended periods, such as two years. (The current (second) draft of NUREG-1022, Rev. 1, which was noticed for comment on February 7, 1994, essentially repeats the guidance of Questions 14.13 and 14.14 in on pages 11 and 12, with additional discussion on page 109.)

Furthermore, the licensee, in a letter submitted on November 9, 1993, stated its intention of reporting on an approximately quarterly basis. There is no provision in the LER rule or in NRC event reporting guidance that allows delaying reportable events until the end of a quarter.

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Memo

As stated in NUREG-1022, revisions should not be used to report new events months after the original event. Events of this type should be reported as new LERs, not as revisions to previous LERs. The flexibility provided by NUREG-1022, Supplement 1, should not be used as a mechanism to avoid submitting separate reports.

/s/
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