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SUBJECT: Comment on proposed "Review of NRC Insp Rept Content, Format & Style." Insp detail should be brief & ref previous rept by section or at min IR number.

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(5)

David Meyers, Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
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Dear Sir:

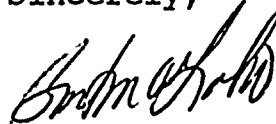
This letter is Arizona Public Service's (APS) response to the request for comment concerning Nuclear Regulatory Commission (NRC) Inspection Reports. APS comments are brief and follow the format numbering in the Federal Register dated May 30, 1995 pages 28180 and 28181.

- A.1.a. Not always. If a problem is formal during an inspection that is not directly related to health and safety of the public, it should be mentioned but not tracked as an issue for the inspector to follow up.
- A.1.d. Report the facts, the concern of too negative or equal time dilutes the issue. The report should focus on regulatory issues. Too often the IR's drive the business end of the utility because of comments inspectors make.
- A.1.b. The detail should be brief and reference the previous report by section or at a minimum IR number.
- B.1.a. Yes, all regions should use a similar format which will assist utilities trying to trend information.
- B.1.b. With a seasoned inspector focused on protection of the health and safety of the public "pulling the reins" the integrated IR's could be more comprehensive and concise.
- B.1.c. More standardization or boilerplate where applicable would ease the utilities ability to understand exactly what NRC wants accomplished. There would be much less reaching between the lives.

- B.2.b. APS would favor a "bulletized" approach to inspection reports.
- C.1. APS would favor a deletion of the "we are deeply concerned comments" in the IR cover letters unless there is a clear direct tie from the actual adverse condition and the health and safety of the public.
- C.2. The particular inspector should take ownership in the IR of their findings especially in team inspections to facilitate the licensee addressing issues.
- C.4. APS feels that the points are generally made and the extra expense and delays which are added to the report to correct a few types are not warranted.

APS appreciates the opportunity to comment. If there are any questions concerning the comments please contact Burton Grabo, Section Leader of 602-393-6492.

Sincerely,



Burton A. Grabo
Section Leader
Nuclear Regulatory Affairs

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