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SUBJECT: Comment on proposed "Review of NRC Insp Rept Content, Format & Style."

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U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: *Review of NRC Inspection Report Content, Format, and Style*
(60 FR 28180, May 30, 1995)
Request for Comments

On May 30, 1995, the Nuclear Regulatory Commission published for public comment, "Review of NRC Inspection Report Content, Format, and Style." These comments are submitted on behalf of Florida Power & Light (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

FPL provides the following responses to the questions stated in the notice.

A. Inspection Report Content

1. Focus on safety:

- a. *Are inspection reports appropriately focused on safety issues? Should report writers be required to articulate the safety significance of each finding?*

The inspection reports are focused on safety issues, however much of the significance of the important issues is lost due to the inordinate quantity of miscellaneous discussion which should be removed. The report writers should not be required to articulate the safety significance of each finding as their opinion on safety significance could be based on judgement and not analytical data.

- b. *Is the level of detail for a given issue generally commensurate with the significance of that issue?*

The level of detail is frequently not commensurate with the significance of an issue (see above).

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- c. *What threshold of significance should be used to determine whether or not an observation should be documented in the inspection report? Do existing reports generally use an appropriate threshold of significance?*

There should be no threshold of significance applied to determine whether or not an observation should be documented. The report should be a summary of the activities the inspectors reviewed or monitored, with a discussion of what they observed.

- d. *Are reports, as currently written, too negative in their focus? Should "equal time" be given to discussions of licensee strengths and successes? If so, what criteria should be used to include such findings in inspection.*

The reports are written appropriately. No additional time on strengths and successes is necessary.

2. Supporting Details:

- a. *Do inspection reports generally contain an appropriate level of detail to describe technically complex issues?*

Yes.

- b. *What level of detail should be included for describing an event when that event has already been described separately in a licensee event report?*

The level of detail currently included is adequate to describe the event.

- c. *What level of detail should be used to describe inspection activities when little or no findings have resulted from those activities?*

Very low level of detail: just enough to ensure that the appropriate areas that were inspected are discussed.

- d. *What are the costs and benefits of including, as enclosures to the report, all referenced material to support report findings (e.g., licensee procedures, supporting calculations, or independent studies)?*

High administrative cost, very low benefit to industry.



3. Enforcement Issues:

- a. *What information should be included in inspection reports to support taking enforcement actions?*

The citation should be specific as to what the violation is. The regulation/requirement which was not met should be spelled out clearly and specifically. Any discussion on the safety significance of the issue should be analytically based and should be included in the citation and not in the body of the inspection report.

- b. *Are reports generally clear in stating the circumstances of the violation (e.g., what requirement was violated, how it was violated, who identified it, etc.)?*

Yes.

- c. *Is sufficient detail generally given to substantiate enforcement-related conclusions?*

Sufficient detail is usually given, however, much of it is included in the body of the report and not the citation.

- d. *Should all minor and non-cited violations be documented in inspection reports? What threshold should be used to determine the significance of compliance items that must be documented?*

All violations should be documented, or the regulations changed. Applying a threshold to violations which are judged to not be significant adds a high degree of personal judgement to the process. This results in varying inspection results between inspectors, sites, and regions.

4. Clear Conclusions:

- a. *Are report conclusions generally well-supported by facts? Is the progression of logic generally clear?*

Yes.

- b. *Is a conclusion statement always necessary for each section of the report (e.g., when limited observations or findings were made in a given area)?*

No. In general, the inspector should draw no conclusions other than 'no deviations or violations were identified,' or cite the licensee if a violation was found.

B. Inspection Report Format

1. Consistency:

- a. *Should inspection report formats be consistent from region to region? What benefits or problems would result from adopting a standardized report outline?*

Consistency of regulation is of paramount importance for the nation. The inspection process ensures that the federal standards are applied and met by all licensees. The inspection report provides assurance that the inspection process is ensuring continued compliance with these standards. If the reports are not held to the same standards throughout all the regions, the results of the inspection process cannot be assured to be uniform.

- b. *What are the advantages and disadvantages of combined or integrated inspection reports (e.g., one report per six weeks, per reactor site, covering all areas)?*

The report should address performance by 'management' units; if a dual unit site is managed by one plant manager, one maintenance manager, etc., then one report is appropriate. If each unit has its own organization, separate reports are appropriate. The reports should address specific areas, as assigned by regional headquarters.

- c. *When is the use of "boilerplate" appropriate (i.e., standard phrases or sentences used from report to report to describe similar inspection methods, purposes, or conclusions)? Should more or less boilerplate be used?*

Boilerplate is not appropriate at any time, as it serves no purpose in the context of the inspection report. Additional information is always available for those individuals who are interested in specific details.

2. Readability:

- a. *What features increase or decrease a report's readability or effectiveness in communication?*

The reports should be shorter, but in general they are quite readable

- b. *Do you prefer a narrative or a "bulletized" appearance?*

The current narrative format is preferable. This format has more 'flow' as compared to a bulletized format.

3. Usefulness:

- a. *What features increase or decrease the efficiency of later efforts to retrieve information from a report (e.g., for SALP reviews, regional studies, or external reviews)?*

With the recent explosion in access to electronic versions of the reports, text searches enable recovery of the portions of the reports which are of interest.

- b. *Are there particular parts of the report that could be deleted without decreasing the report quality or detracting from its function?*

Current report break down is adequate.

4. Report Summaries: *What information should be included in a report summary? How should it be presented?*

Report summaries as currently written are good executive summaries.

5. Cover Letters: *How might cover letters be modified to express more clearly the level of concern, or to better convey a particular performance message to a licensee?*

The cover letter is where regional management has the opportunity to state its opinions. The inspection report should be a recital of facts. Much of the subjective opinion within the report should be eliminated, and the substantive opinions should be in the cover letter. No particular prescriptive format should be established as the number of variables is so large.

C. Inspection Report Style

1. Style Variations: *In what ways do variations in writing style influence the effectiveness of inspection reports?*

No significant variations noted.

2. NRC style: *Are there particular features of standard NRC style (e.g., consistent use of past tense or third-person form) that make inspection reports more readable? Less readable?*

The inspection reports, in general, are quite readable.

3. Tone: *Are inspection reports generally written in an appropriate tone?*

The tone is normally appropriate, but subjective opinions should be eliminated from the report.

4. Grammatical Construction: *Are inspection reports generally acceptable in sentence and paragraph construction? Do they give evidence of careful proofreading?*

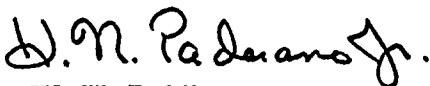
The reports are normally well written.

D. Additional Comments

It would be helpful if the NRC could send inspection reports electronically after they are signed out. This would assist the licensee in expediting a timely response. Mail delays routinely run three to four days.

We appreciate the opportunity to comment.

Very truly yours,



for W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/spt

cc: Nuclear Energy Institute, Inc.

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