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TO: Mr. Don K. Davis

FROM: FPL  
Miami, Fl. 33101  
Robert E. Uhrig

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DESCRIPTION *Ref their 8/12/77 ltr...*  
Furnishing response to ltr dtd 08/12/77  
requesting to replace the reference to  
Regulatory Guide 1.16 in Technical Specification  
6.9.1 with the words from Regulatory Guide  
1.16...

ENCLOSURE

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REGULATORY DOCKET FILE COPY



October 24, 1977  
L-77-327

Office of Nuclear Reactor Regulation  
Attention: Mr. Don K. Davis, Acting Chief  
Operating Reactors Branch #2  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



Dear Mr. Davis:

Re: St. Lucie Unit 1  
Docket No. 50-335  
Reporting Requirements

Your letter of August 12, 1977 requested that we replace the reference to Regulatory Guide 1.16 in Technical Specification 6.9.1 with the words from Regulatory Guide 1.16. Sample technical specifications were enclosed for our use.

Although your proposal would delete mandatory reporting of Events of Potential Public Interest and use of reporting forms contained in the referenced Regulatory Guide, it would also require changes in several implementing procedures and in the plant staff training program. The procedures and training program would have to be revised to delete reference to Regulatory Guide 1.16 and include reference to the new Technical Specification 6.9.1. Additionally, we believe that revision of the Technical Specifications as you have suggested would unnecessarily burden them and would result in unnecessary duplication. We would view the matter differently if Regulatory Guide 1.16 were to be also deleted. After reviewing these considerations, we find that we prefer the existing "reference" format of Technical Specification 6.9.1, and do not plan to propose its amendment at this time. We are, however, available for further discussion of this issue of updating and clarifying technical specification reporting requirements. One alternative would be to revise the established Regulatory Guide 1.16, thereby achieving the goal of deleting unnecessary reporting requirements while, at the same time, minimizing the amount of written material in the Technical Specifications.

Your letter also discussed NUREG-0161, "Instructions for Preparation of Data Entry Sheets for Licensee Event Report (LER) File." We would like to take this opportunity to comment on NUREG-0161:

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- (1) NUREG-0161 states that background and any other supplementary information required for a full understanding of the event should be provided as an attachment to the LER form. This, being a non-specific open-ended requirement, is subject to interpretation. "Sufficient information for full understanding" depends on the reader's background.
- (2) The main purpose of the LER form is to provide information on off-normal events to a computer data bank. Since attached information is not used for this purpose, the attachment becomes of secondary importance and need not be the subject of special instructions.
- (3) Compatibility with the Nuclear Plant Reliability Data System (NPRDS) does not necessarily make the new LER form less burdensome, as claimed in the Introduction to NUREG-0161. The responsibilities for compiling NPRDS reports and LER's reside with different groups within Florida Power & Light Company. Increased coordination of these responsibilities would actually increase the work load. In addition, the new LER forms are longer and more detailed, and will not be easier to complete than the current forms.
- (4) The "PROCEDURES" section on page 3 of NUREG-0161 claims that "the procedures described herein do not impose any additional reporting requirements." This will be true as long as NUREG-0161 instructions are interpreted as "guidelines" and not "requirements."
- (5) One effect of NUREG-0161 will be to expand one report into two reports, i.e., the LER abstract which is intended to stand alone, and the separate narrative attachment. This considerably increases the work needed to file a Reportable Occurrence report.

Technical Specification 6.9.1 requires that Reportable Occurrences be reported in accordance with Regulatory Guide 1.16, Revision 4.

The Guide specifies that written followup reports should include, as a minimum, a completed copy of a Licensee Event Report form, to be supplemented by additional narrative material to provide complete explanation of the circumstances surrounding the event. Our current practice of continuing the Event Description and Cause Description on a separate page whenever more space is needed satisfies the Technical Specification requirements. A separate narrative attachment that restates the LER form in greater detail is therefore unnecessary.

Office of Nuclear Reactor Regulation  
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Although we have objections to NUREG-0161 as described above, we do intend to implement the new LER form with the understanding that our Reportable Occurrence reports will maintain their present overall format, and that NUREG-0161 will not become an auditable requirement. Also, rather than change our reporting practices in mid-year, it would be simpler for us to continue using the current LER form for the remainder of 1977 and begin using NUREG-0161 for general guidance in implementing the new LER forms after January 1, 1978

Very truly yours,



Robert E. Uhrig  
Vice President

REU/MAS/cpc

cc: Mr. James P. O'Reilly, Region II  
Robert Lowenstein, Esquire