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50-250/251
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TO: Mr. George Lear

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

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DESCRIPTION
Furnishing comments in response to NRC's ltr dated 07/29/77 which forwarded new "instructions for Preparation of Data Entry Sheets for Licensee Event Report File", NUREG-0161, July 1977...

2p **ACKNOWLEDGED**

DO NOT REMOVE

PLANT NAME: TURKEY POINT UNITS 3 & 4
jcm 09/08/77

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September 1, 1977
L-77-275

Office of Nuclear Reactor Regulation
Attention: Mr. George Lear, Chief
Operating Reactors Branch #3
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Lear:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
NUREG-0161

Regulatory

File CY

Your letter of July 29, 1977 forwarded new "Instructions for Preparation of Data Entry Sheets for Licensee Event Report (LER) File", NUREG-0161, July 1977. Your letter also requested that we review the instructions and notify you if we did not anticipate being able to use the revised form.

We have reviewed NUREG-0161 and have the following comments:

- (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.

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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 6.9.2 specifies the reports required to describe Reportable Occurrences. Specifications 6.9.2.a (prompt reports) and 6.9.2.b (30-day reports) state, in part, that written followup reports shall 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 not necessary.

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. Thus, we plan to use 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