

BALTIMORE GAS AND ELECTRIC COMPANY

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ELECTRIC PRODUCTION DEPARTMENT  
CALVERT CLIFFS NUCLEAR POWER PLANT  
LUSBY, MARYLAND 20657

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DOCKET NUMBER  
PROPOSED RULE PR-20+50 (4)  
(45 FR 13434)

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Docket Nos. 50-317  
50-318

Attention: Mr. Samuel J. Chilk  
Secretary of the Commission

DOCKET NUMBER  
PROPOSED RULE PR-61 (2)  
~~(45 FR 13104)~~

This refers to an amendment to the NRC regulations published in the Federal Register on February 29, 1980. This amendment added new section 50.72, "Notification of Significant Events."

As required, we have implemented the regulation at our Calvert Cliffs Plant and, based on our experience, offer comments as follows:

1. In general, the initial purpose for the direct phone line is substantially diluted by a number of relatively mundane reporting requirements contained in the new section. The initial OIE Bulletins and letters directed that reports to the NRC Operations Center be made for situations which could impact the public health and safety. In our estimation, these circumstances might include plant conditions which require engineered safety features to function or which result in actual radiation releases in excess of Technical Specification limits. Instead, the reporting requirements set forth by new section 50.72 seem to be aimed at situations which may attract news media interest, as well as situations of a more severe nature. In lowering the reporting threshold to this extent, a mechanism which could have a very useful purpose, such as obtaining assistance when it is actually needed, has been transformed to a device by which the NRC staff can keep themselves informed of relatively trivial occurrences at the licensed plants. If, in fact, it is absolutely necessary that items of lesser importance be reported, we do not feel that they should be "mixed in" with the requirement to report items of actual potential hazard to the public; a separate and distinct reporting mechanism should be established.

Acknowledged by card. 5/7/80 mdr

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2. Whenever reports are made over the dedicated phone, it is our policy that the Shift Supervisor, as the senior member of the shift organization, make these reports. This policy assures that complete and accurate reports are made. It has been our recent experience that the personnel manning the Operations Center are required to obtain answers for a checklist; many of the checklist items do not pertain to the situation being reported. For instance, a straight-forward plant trip requires answers regarding engineered safety features, reactor coolant parameters, etc. Answering this list of questions is time-consuming for a valuable member of the shift organization. A similar checklist is used by the OIE Resident Inspector, once again at the expense of members of the shift, if the inspector is on-site at the time of the reported incident. Such duplicity of reporting requirements is overly burdensome and distracting.

We appreciate the opportunity to have our comments considered in this recent rulemaking; should you have questions regarding these comments, we would be pleased to discuss them with you.

Very truly yours,

*L B Russell*

L. B. Russell  
Chief Engineer  
Calvert Cliffs Nuclear Power Plant

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