

ARIZONA



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April 30, 1980

DOCKET NUMBER
PROPOSED RULE PR-20+50 (7)
(45 FR 13434)



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: "Immediate Reporting of Significant Events at Operating
Nuclear Power Plants" (50.72) (45 FR 13434)

Dear Sir:

On Friday, February 29, 1980, the NRC published in the Federal Register a rule on "Immediate Reporting of Significant Events at Operating Nuclear Power Plants" (50.72) (45 FR 13434). Although the rule was made effective immediately, comments were invited for consideration.

Arizona Public Service Company respectfully submits the attached comments and trusts this information will be of aid to you in reconsidering or modifying this rule.

Thank you for your consideration.

Very truly yours,

LKM:RWK:mc
Attachment

Acknowledged by card. 5/13/80...mdx

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Attachment

- A. The reporting criteria are ambiguous and difficult to interpret. We believe that clarification of the events listed would greatly reduce confusion and frustration in their use and promote a more positive attitude toward reporting significant events.
- B. 50.72 is worded to require notification within one hour of the occurrence of the event. However, many of the items listed actually consist of a double condition; that is, the event and a result (event requiring initiation of, event that results in, etc.). It is not clear whether the one hour requirement begins when the event occurs or when the result occurs. It is suggested that the rule be reworded to clarify that notification is required within one hour after the manifestation of a significant result.
- C. The following comments address each of the twelve listed events.

Event:

1. Any event requiring initiation of the licensee's emergency plan or any section of that plan.

Comment:

Paragraph B, above, applies in that the event cannot be reported until it has progressed to the point which requires initiation of a section of the emergency plan.

Event:

2. The exceeding of any Technical Specification Safety Limit.

Comment:

This item is unambiguous and is satisfactory as is.

Event:

3. Any event that results in the nuclear power plant not being in a controlled or expected condition while operating or shutdown.

Comment:

Paragraph B applies, and further clarification is needed in terms of the parameters/equipment which are not in a controlled or expected condition. This requirement should not apply to every parameter or piece of equipment in the plant, nor should it apply to slight changes in significant plant parameters. Further guidance is required.

Event:

4. Any act that threatens the safety of the nuclear power plant or site personnel or the security of special nuclear material, including instances of sabotage or attempted sabotage.

Comment:

Paragraph B applies, and further clarification is needed to define what constitutes a threat to safety or security.

Event:

5. Any event requiring initiation of shutdown of the nuclear power plant in accordance with Technical Specification Limiting Conditions for Operation.

Comment:

Paragraph B applies.

Event:

6. Personnel error or procedural inadequacy which, during normal operations, anticipated operational occurrences, or accident conditions, prevents or could prevent, by itself, the fulfillment of the safety function of those structures systems, and components important to safety that are needed to (i) Shutdown the reactor safely and maintain it in a safe shutdown condition, or (ii) Remove residual heat following reactor shutdown, or (iii) Limit the release of radioactive material to acceptable levels reduce the potential for such release.

Comment:

This item is highly complex and subject to interpretation. This item has the potential for much confusion and must be clarified and simplified before it is adequate for its intended use.

Event:

7. Any event resulting in manual or automatic actuation of Engineered Safety Features, including the Reactor Protection System.

Comment:

Paragraph B applies, and the item must be reworded to exclude normal, planned actuations which are part of surveillance testing or normal operations.

Event:

8. Any accidental, unplanned, or uncontrolled radioactive release. (Normal or expected releases from maintenance or other operational activities are not included).

Comment:

The word "any" is not adequate to identify the initiation of such an event. Guidance must be provided to clarify the notification requirement or provide a threshold.

Event:

9. Any fatality or serious injury occurring on the site and requiring transport to an offsite medical facility for treatment.

Comment:

As presently worded, this item would also require immediate notification for injuries sustained during construction of additional units at the site of a licensed unit. The item also makes no distinction between events related to plant operation and those which are not related (e.g. a clerk trips on the sidewalk and breaks her arm). This must be clarified to specify its relationship to plant operation and protection of the health and safety of the public.

Event:

10. Any serious personnel radioactive contamination requiring extensive on site decontamination or outside assistance.

Comment:

Inclusion of the word "serious" raises questions, rather than clarifying the item. Clarification is needed of what meaning is intended.

Event:

12. Strikes of operating employees or security guards, or of picket lines by these employees.

Comment:

This item is not clear as to the type of employees or the number of employees required to be affected in order to notify the NRC. There should be a specified minimum number of shift operators and of security guards, with notification required if this number is not met. As presently worded, the number could be two or all.

In conclusion, the desired end result of such notifications and their intended use must be kept clearly in mind when specifying the requirements for such notifications. Clarity of these requirements is necessary for useful and consistent reporting, and to avoid trivializing such reports.