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 (45 FR 13434)

May 9, 1980



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

Attention: Docketing and Service Branch

Subject: Final Rule on Immediate Reporting of Significant  
 Events at Operating Nuclear Power Reactors 45 FR 13434  
 February 29, 1980.

Dear Sir:

Commonwealth Edison has reviewed the subject rule and  
 provide the attached comments.

We appreciate having been given the opportunity to  
 comment.

D. L. Peoples  
 Director of  
 Nuclear Licensing

attachment

Acknowledged by card... 5/16/80...mdv

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Comments on Rule 10 CFR 50.72 - Notification of  
Significant Events

Item 1 - Emergency Plan Events

Application of this item prior to the time when emergency plans are revised to conform to NUREG-0610 appears premature. This will result in the reporting of events of minor significance from existing plans which were developed to alert or notify corporate personnel for information only. This item should not be applied until emergency plans are revised which in our case would be no earlier than July 1, 1980. In the interim, notification would be in accord with past guidelines.

Item 5 - Events Leading to Shutdown from LCO Condition

These items should only be reportable if shutdown is required and actually occurs. Operation below the most conservative LCO condition is allowed by Technical Specifications and is dependent in most cases upon verifying redundant equipment operable through performance testing. Since testing conditions vary and proof of operability of redundant equipment may proceed during the entire grace period (usually 4 hours) even though shutdown is initiated, this item will result in notification of events where shutdown doesn't occur, are fairly frequent, and of low interest. For these controlled situations, notification is for interest only and should be limited to actual shutdowns.

Item 7 - Events Resulting in Engineered Safety Features Actuation

Since this event as stated includes actuation of the Reactor Protection System, most trips will be reported whether ESF actuates or not. This item should be clarified to require notification only of actual events and eliminate unit or reactor trips and spurious ESF events since these are of low interest or are reportable elsewhere if significant (i.e. - per item 11). If not changed, reporting of these events per the NRC gray book requirements should be eliminated to minimize redundant reporting.

Item 9 - Reporting of Fatalities or Serious Injuries

Clarification is required to define the word 'serious'. This is being interpreted by region inspectors as any time an ambulance or emergency vehicle is called to transport an accident victim. Since this type criteria is strictly subjective and conservative in approach, the unnecessary reporting of minor injuries will result.

Item 10 - Personnel Contamination

The same comment regarding the definition of 'serious' as in Item 9 applies.

Item 12 - Strikes of Guards or Operating Personnel

This item should be revised to limit reporting so that wildcat stikes or picketing that does not prevent shift turnover are not reportable. Since picketing is usually limited to one plant entrance it alone is not indicative of a serious effect on plant operation. Stikes, especially wildcat type, can often be handled expeditiously and resolved such that the operating shift is relieved within a reasonable period beyond their normal shift (i.e. - 4 hours).