



Wisconsin Electric POWER COMPANY
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December 8, 1980

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Denton:

CONSOLIDATION OF REPORTING REQUIREMENTS

In our letter to the Secretary of the Commission dated June 4, 1980, we provided comments on 10 CFR 50.72 concerning the immediate reporting of significant events at operating nuclear power reactors. Included in our comments was a request that a consolidated listing of the many diverse NRC reporting requirements be developed. We mentioned that Regulatory Guide 10.1 had at one time provided such a listing but had not been revised since 1977. To date, we have observed no NRC action on this comment.

In light of the recently proposed NRC policy statement on enforcement actions, we believe there is an even more pressing need for consolidated guidance from the NRC regarding all aspects of reportability. The proposed policy statement directs that any failure to provide full, complete, timely, and accurate information and reports be treated as a violation and carry the same severity level enforcement action as the matter not properly reported. Given the confusion and conflicts in present reporting requirements, we believe the lack of a simplified and straightforward reporting requirements listing will unavoidably result in automatic licensee fines and licensing actions. We, therefore, again urge the NRC staff to clarify and consolidate all licensee reporting requirements so as to eliminate insofar as possible misunderstanding, misinterpretation, or incorrect application of the diverse reporting requirements.

Very truly yours,

C. W. Fay, Director
Nuclear Power Department

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