

2742 - 42 Street
Two Rivers, WI 54241

June 17, 1981

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, DC 20555



Dear Mr. Denton:

NUISANCE LICENSEE EVENT REPORTS

Over three years ago (March 30, 1978), I sent a letter to then (and now) Chairman Joseph Hendrie concerning the number of "nuisance" licensee event reports required by NRC. Acting Director of Nuclear Reactor Regulation, Edson Case, responded on May 4.

I had pointed out that minor setpoint drifts in one of three or four redundant monitoring channels do not affect the health and safety of the public; but they do account for an inordinate number of LER's. Mr. Case correctly stated one cause of reports as the setting of setpoints close to the Technical Specification value to minimize the danger of spurious trips. He agreed with me that usually there are additional channels which would have typically responded correctly. But he refused to take credit for those channels to justify elimination of LER's. He correctly observes that, "... frequency of unacceptable instrument drift occurrences ... will not be corrected by eliminating the requirement to report violations of Technical Specification safety system limits."

I would counter with an observation of historical trends of the frequency of LER's. The frequency of drift will not be corrected by maintaining the requirement either.

The other area of concern was the reporting of greater than 1 $\mu\text{Ci/cc}$ dose-equivalent iodine (DEI). I will not dispute that the concentration of fission products in the coolant is of safety significance. My point is the reporting limit is set too low. I fully understand the phenomenon of iodine spiking and potential repercussions with respect to steam generator tube ruptures. But if there is a spike to 1.5 $\mu\text{Ci/cc}$ DEI and no tube leak, there is no impact on the health and safety of the public. If the spike is to something greater than 10 $\mu\text{Ci/cc}$ DEI, I would interpret that as unusual and worthy of some type of report.

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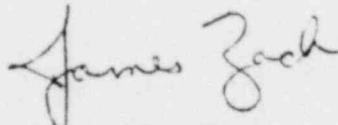
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Mr. Case noted that, "... The reporting requirements are necessary to provide ... an adequate data base..." That, in my opinion, is not the function of LER's. If it were, the data base should be more than adequate by now.

The concept of reporting iodine concentrations has little relationship to whether there is an observed increase in fission product concentration in the coolant. For example, there are Technical Specifications in effect which require sampling at a given frequency. Be it reported or not, plant personnel are aware of the concentration. In addition, the NRC is mandating failed fuel monitors on the primary system and has always had monitoring on the condenser air ejector. If coolant activity increases by a significant amount to where it is a safety concern, the failed fuel monitor is the first line of defense since it is real time.

My interest in this area of "nuisance" reporting was piqued by Mr. William Dirck's Policy Issue of February 24 to the Commissioners relating to the "Feedback of Operating Experience." He noted that there are 10-15 per day or about 5,000 per year. This amount of paper required the establishment of a separate division (AEOD) in NRC to sift through the reports to try to find something significant. The utility industry--not to be outdone--countered with NSAC to duplicate NRC's efforts. If nuisance reports were eliminated, I as a Senior Reactor Operator and a responsible member of management at a nuclear power plant, may be able to look at all reports myself and determine what is important to my situation rather than receive filtered material which is not timely.

Very truly yours,


James J. Zach

Enclosures

Copy to The Vice President of the United States
George Bush
The Honorable William Proxmire, Senator
from Wisconsin