

2731 - 42 Street
Two Rivers, WI 54241

March 30, 1978

Mr. Joseph Hendrie
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Hendrie:

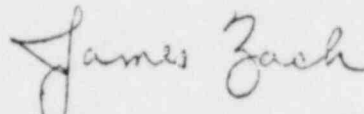
Is it not time to reevaluate some of the Technical Specifications for nuclear power plants which cause nuisance reports? For example, many plants have to report whenever the radioactivity in the primary coolant exceeds 1.0 $\mu\text{Ci}/\text{gram}$ Dose Equivalent Iodine-131 (DEI-131). It is a well-documented fact that a shutdown and/or primary system depressurization causes coolant activity to increase temporarily. However, at the same time, the source of the activity (nuclear fissions) has been stopped. So, time after time, licensees report that there was no safety hazard and no corrective action required.

Setpoint drift is another example of the source of many reports. The bottom line for these is usually two other channels would have performed satisfactorily so the health and safety of the public was not affected.

Why does the Nuclear Regulatory Commission not evaluate these reports and seeing their import, change the Technical Specifications? In the above example, the specification could be applicable only in cases when the reactor is at power. There are many other instances in which Licensee Event Reports must be filed which only serve to congest the mails and keep reproducing machines busy.

I have no objection to reporting unusual or serious situations. But is this not a bit ridiculous?

Very truly yours,


James J. Zach

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POOR ORIGINAL