



**NRMA**

**Nuclear Records Management Association, Inc.**

USNRC

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH *emp*

Secretary of the Commission  
Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

DOCKET NUMBER

PROPOSED RULE

PR-50  
(47 FR 19543) **47**

SUBJECT: Comments on Proposed Rule - Licensee Event Report System

Dear Sir:

The following comments are offered on the Proposed Rule, Federal Register Vol. 47, No. 88 dated May 6, 1982, relative to 10CFR50 Licensing Event Report System. The Board of Directors of the Nuclear Records Management Association views the proposed rule as having an adverse effect on present recordkeeping requirements and being inconsistent with the intent of the Paperwork Reduction Act.

Specifically, 10CFR50.73(a)1 of the proposed rule requires the reporting of engineering safety features and reactor protection system actuation. If the proposed rule is, as stated, to capture significant events, normal plant trips which follow the anticipated design basis do not warrant the generation of an LER. The generation of an LER would result in redundant reporting as this information is reported to the NRC as part of the Monthly Operations Report and daily to the NRC Incident Response Center.

Submittal of a report in less than 30 days after the discovery of the event will undoubtedly result in a substantial number of supplemental reports. Further, the staff has indicated it may be necessary if the 30-day reporting period is established to require a "mini" report in a shorter time frame. This will result in a substantial increase in reporting. If this information is required, it should be provided under 50.72 (Immediate Reporting Requirement) which is currently under review.

The proposed rule states that the commission has the right to direct a utility to make an engineering evaluation of any event it chooses. This is not a requirement of the present rule and virtually gives the staff an unlimited license to request costly and timely engineering studies at the licensee's expense. The proposed rule also includes a provision for the staff to ask for supplemental information which would be used for such engineering studies. If the staff determines that a study is required, the staff should perform the study, not the licensee.

If you have any questions on these comments, please contact me at (713) 839-2802.

Respectfully,

*Thomas E. Amerine*

Thomas E. Amerine  
President, Nuclear Records  
Management Association

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Acknowledged by card. *8/11/82 emp*