

Westinghouse
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Water Reactor
Divisions

Nuclear Technology Division
DOCKETED
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Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Comments on the Proposed Rule for the Licensee Event Report System

Dear Mr. Chilk:

Westinghouse has reviewed the proposed rule for the "Licensee Event Report System" published in the Federal Register of May 6, 1982. The proposed rule would add a new Section 50.73 to the CFR's to codify LER initiation and content.

Westinghouse screened all LER's from plants with the Westinghouse NSSS for a period of 14 months and from experience concurs with the elimination of LER's on minor technical specification infringements. The Westinghouse criteria for selecting significant events were in part similar to the nine criteria of the proposed rule, i.e., an unreviewed condition, actual operation of safety systems, maloperation that could compromise safety, also an isolated single failure within design base was not considered significant. Westinghouse assumes that the nine criteria of the proposed rule will reduce the volume of paper work and increase the efficiency of event review. Westinghouse also assumes that the criteria will be on a trial basis to evolve interpretation and change recommendations through use.

It is noted that some gross failures or degradations that are determined by surveillance may not enter the LER system if they are not an event that happens to actuate or affect a safety system or become obvious during normal operation, i.e., material degradation, fuel damage, single component failure. It is recognized that major surveillance findings will be noted and dealt with by other means, but how will a major but passive fault enter the LER system?

It is noted that part (b)(2)(v) of the proposed rule requires the utility to use the IEEE Energy Industry Identification System for coding the affected systems or component functions. Since some utilities and vendors already have implemented alpha numeric identifier systems, it is recommended that data entry on the LER allow the use of existing systems. The NRC or others that engage in data entry programs could translate from the various identi-

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Acknowledged by card... 8/26/82 emp

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Mr. Samuel J. Chilk

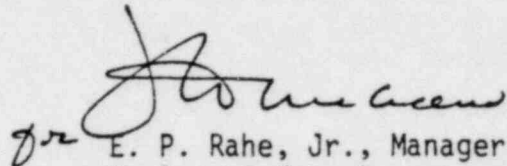
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August 5, 1982
NS-EPR-2634

fier systems to a compatible entry. Westinghouse is aware of the desire and even the need to have a clean and universal identifier system for functions and components. Westinghouse encourages the use of NPRDS or the IEEE, but mandatory imposition of a universal system is not recommended.

Comments or requests for clarification on the Westinghouse position can be addressed to R. D. Burch (412/373-5750).

Very truly yours,


E. P. Rahe, Jr., Manager
Nuclear Safety Department

RDB/bek