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February 23, 1994

Mr. David L. Meyer, Chief
Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Meyer:

Below are my comments on draft NUREG-1022, Revision 1, "Event Reporting Guidelines, Second Draft for Comment," which was made available on February 7, 1994 (Federal Register, Vol.59, No.25, p. 5614).

General Comment:

The staff has done a very commendable job, in my opinion, of responding to public and staff comments on the first draft. The document reads well and has simpler explanatory text in many areas. It also clarifies staff positions on issues that needed further resolution (e.g., voluntary reporting, reporting on inadvertent ESF actuations, loss of the off-site power system alone, and inadvertent ATWS system actuations). After incorporating worthwhile public comments, the document should be issued as soon as practical. The consolidation of the previous reporting guidance documents (developed piecemeal over the last ten or so years) into one document alone, plus the new format of side by side rule presentation, will be a big benefit to all parties involved, particularly the NRC staff and the industry.

Specific Comments:

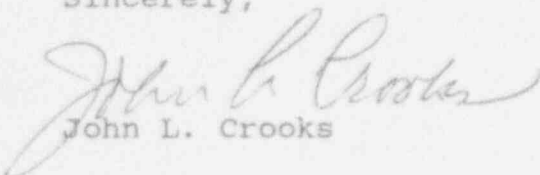
To put the below in perspective, I consider my comments to be minor in nature. In my opinion, the document is ready for issue as is, and nothing should be done to it to jeopardize publication. Another go-around would likely produce diminishing returns.

- (1) This draft does not contain some of the specific definitions of terms that were requested in the workshops (e.g., 3.2.4, Discussion (1), (2), and (3) terms on pages 35-37 [pages 43-45 in first draft]). The text, however, seems generally understandable without them, particularly with the new broader definitions now incorporated.

- (2) Section 3.1.2., Discussion, page 22 - You may want to emphasize that the last part of the event reporting rules (i.e., regardless of operating mode or power level and regardless of) is sometimes not recognized. Experience has shown that some important information was not reported because the problems were found during shutdown (e.g., common cause reactor trip breaker failures), or the system failure occurred in a mode where the system was not required. Maybe, just change the first sentence to "...requires reporting...regardless of...and regardless of...[emphasis added because these parts are sometimes not recognized]."
- (3) Section 3.2.4., Discussion, (4), page 38 - Using TMI as an example of the nuclear power plant being in a condition not covered by the plant's operating and emergency procedures is good, but the threshold for reporting is clearly lower than an accident. I suggest adding one of the two examples on pages 50-51 in the first draft, the LaSalle power instability (if appropriate), or a recently reported valid example.
- (4) Section 3.2.8., Discussion, last sentence in 2nd paragraph on page 52 - Aren't the reactor control rooms non-smoking areas (if they are not they probably should be)? I suggest using examples that don't reference ash trays or cigarettes or deleting the last sentence. Depending on comments from others, you might also revert to the previous position of reporting all control room fires, at least initially via 50.72. Very few such fires should be occurring; if there are many, then the reports are of value to the staff.
- (5) Section 3.3.2 - The ESF section rewrite reads very well and is understandable.
- (6) The reasons for the specific reporting rule were deleted from the Discussion in several specific Sections. For example, the 2nd and 3rd paragraphs under Section 3.3.6., Discussion, on pages 106 of the first draft was deleted. This information was developed in response to the workshops and documented a logic for future users to understand the NRC's needs. I suggest re-adding some explanatory material, unless its contentious, to those specific areas where the explanations do not exist elsewhere (e.g., in the Statements of Consideration or in Appendix A-C).

I appreciate the opportunity to comment as a public citizen. If staff wants to discuss the comments further, please contact me at the above phone number.

Sincerely,


John L. Crooks