

DS09



NUCLEAR ENERGY INSTITUTE

1994 APR -5 PM 1:34

10165

D. Allison
S9RR5614

2/7/94

(4)

April 5, 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, D.C. 20555

SUBJECT: Draft Report, NUREG-1022, Revision 1, "Event Reporting Guidelines,
Second Draft Report for Comment"

Dear Mr. Meyer:

These comments are submitted on behalf of the Nuclear Energy Institute (NEI)¹ in response to the subject draft NUREG-1022, Revision 1. We commend the staff in their responsiveness to the industry's comments. In general the direction the staff has taken will provide a positive enhancement to the reporting of safety significant events. In addition to the following general comments, Enclosure 1 provides specific comments on the draft NUREG.

The staff has performed a major rewrite of the first draft of NUREG-1022 that addresses many of the concerns and comments from industry, including the use of unclear examples, emphasis on enforcement actions, and voluntary LER reporting. We

¹ NEI is the successor organization to the Nuclear Management and Resources Council (NUMARC). NUMARC was the organization of the nuclear industry responsible for coordinating the efforts of all utilities licensed by the NRC to construct or operate nuclear power plants, and of other nuclear industry organizations, in all matters involving generic regulatory policy issues and the regulatory aspects of generic operational and technical issues affecting the nuclear industry. NEI's members include every utility licensed to operate a commercial nuclear power plant in the United States, the major nuclear steam supply system vendors, major architect/engineering firms, fuel fabrication facilities, materials licensees and other holders of NRC licenses, and other individuals and organizations involved in the nuclear energy industry.

9404070118 940405
PDR NUREG
1022 PDR

Mr. David L. Meyer

April 5, 1994

Page 2

wish to reemphasize the importance in providing clear examples and guidance in order to minimize differing interpretations of reporting requirements.

As part of both the industry's and the NRC's efforts to identify and remove requirements marginal to safety, requests of licensees to provide voluntary reports should be deleted from the proposed Revision 1 to NUREG 1022. The emphasis on reporting should be on safety significant issues rather than "staff interest" or making sure that "important information" was not missed. If there are situations where some safety-related events are not being reported, then appropriate action should be taken by the staff to assure that this information is reported. There is a significant effort underway within the NRC and the industry to reduce unnecessary reporting requirements. Requesting licensees to voluntarily report events that are not required to be reported under the current regulations significantly undermines that effort. Additionally, requesting voluntary reporting can create interpretation problems between regional and resident inspectors and licensee regarding whether something should be voluntarily reported. Based on these issues, we strongly recommend that all reference to voluntary reporting be removed from the NUREG prior to issuance for industry use.

As an example, there is still disagreement in the area of Engineered Safety Features (ESF) actuations. A major concern continues to be the staff discussions regarding voluntary LER reporting of certain system actuations that may or may not be ESF actuations. The wording of the regulation (10CFR50.73) and the associated Statements of Consideration imply that the reports are reports of safety significance, as identified by their characterization as being ESF systems. Systems that are not labeled as ESF systems do not, by their definition, meet the safety significance test of reporting criteria.

There is still some concern about the vague and conflicting guidance given concerning reporting of conditions prohibited by Technical Specifications (10 CFR 50.73(a)(2)(i)(B)). It is recommended that the staff review associated LERs filed under this regulation, and assess if any events of safety significance have been reported. Based upon this review, and the proposed rewrite of the Administrative Section under the Improved Standard Technical Specifications, it may be possible to publish straightforward guidance that this reporting requirement does not apply to the administrative technical specifications.

Mr. David L. Meyer

April 5, 1984

Page 3

We appreciate the opportunity to comment on the NRC's revised draft. If there are any questions regarding these comments, please call Jim Eaton, Warren Hall or me.

Sincerely,

Warren J. Hall
for

Thomas E. Tipton
Vice President & Director
Operations, Management and
Support Services

TET/JHE:amw

Enclosure

SECTION	COMMENT
General Comment	<p>Since the new 10 CFR 20 regulations have been implemented, the reference to the old revision numbering of 10 CFR 20 should be eliminated. Even if a licensee has the old 10 CFR 20 tables in their Technical Specifications, the reporting criteria is based on the new 10 CFR 20 tables.</p> <p>The new revision to NUREG-1022 should be reviewed against the new Improved Standard Technical Specifications contained in NUREGs-1430 through 1434. In some cases such items as Allowed Outage Times and Limiting Conditions for Operation are incorrectly referenced.</p> <p>It is clear that this revision updates and supersedes the previous revision and supplements to NUREG-1022. However, there are many references to NUREG-1022, Revision 0, and its supplements. Utilities should not have to reference revisions or guidance in order to make reportability determinations. It is suggested that these references be removed so that Revision 1 is a stand-alone document.</p>
Reporting of "voluntary" LERs	There are several instances where the staff requests licensees to report voluntary LERs. Such a request is not appropriate for regulatory guidance.
Section 2.5, <u>Engineered Safety Features</u>	The staff's intent in requesting voluntary reports on systems that may be classified as ESF systems, but are not identified as such by licensees, puts 10 CFR 50.72 and 10 CFR 50.73 reports in the realm of equipment status reports, not as indicators of safety significant events. This is beyond the intent of the regulations. If the staff has a requirement for equipment status reports, it should be required by appropriate regulations.

<p>Section 2.7, <u>Multiple Component Failures</u>, page 13</p>	<p>The third paragraph states that "A single component failure in a safety system is reportable if it is determined that the failure mechanism could reasonably be expected to occur in one or more redundant components ..." This is a very subjective determination and additional clarification should be added that emphasizes there must be firm evidence that the redundant components could have failed. Surveillance testing, as an example, that uncovers additional failures, is an example of firm evidence.</p>
<p>Section 2.7, <u>Relief Valve Testing</u>, page 13 and 14</p>	<p>The current text requires additional clarification. It appears to imply that any discrepancy involving more than one relief valve should be reported. There are both Technical Specification limits and Safety Analysis Report (SAR) limits involved that must be considered. Specifically, the 1 percent drift requirement is a post surveillance and maintenance value, and the SAR and operability value is 3 percent. It may be possible to have relief valves out of tolerance for technical specification purposes, but still not be beyond the specific safety function criteria of 3 percent. Additional discussion is required.</p>
<p>Section 2.10, <u>Retraction/Cancellation of Event Reports</u>, page 15</p>	<p>The second paragraph in this section would suggest that retraction submittals are a request made to the NRC. The third sentence should be changed to state "Sound logical bases for the withdrawal should be communicated with the withdrawal."</p>
<p>Section 2.11, <u>Time Limits for Reporting</u></p>	<p>The time limits for LER reports required by 10 CFR 50.73 discuss the differences between Event Date, Discovery Date, and Report Date. But it discounts the appropriate supervisor and manager reviews necessary to determine reportability, especially with respect to conditions determined to be reportable as a result of engineering analysis. We suggest that the definition of 'Discovery Date' should be clarified as follows:</p> <p style="padding-left: 40px;">The Discovery Date is when someone in the plant recognizes that a reportable event has occurred, or determines that an existing condition is reportable (starts the 30-day clock and should be entered in Item 5 of the LER (event date) if the event date cannot be clearly defined).</p>

<p>Section 3.2.1, <u>Plant Shutdown Required by Technical Specifications</u>, page 24</p>	<p>The second paragraph should be rewritten to clarify that it is actual negative reactivity to reduce power (from at-power conditions) that constitutes the initiation of a nuclear plant shutdown.</p> <p>In addition, the second paragraph should also include a discussion on deliberate temperature reductions for required actions that begin in MODES 3 or 4 with completion in MODES 4 or 5.</p>
<p>Section 3.2.2, <u>Technical Specification Prohibited Operation or Conditions</u>, Discussion, Page 27</p>	<p>The introductory paragraph references TS 3.0.3 and 4.0.5. The terminology and references in the Improved Standard Technical Specifications (NUREGs-1430 through 1434) use a different terminology. This Section should be reviewed against the Improved Standard Technical Specifications and consistent terminology used to support the existing and improved technical specifications.</p>
<p>Section 3.2.2 (2) and (3), page 28</p>	<p>There are several discussions using the term 'firm evidence' on this page. In determining that a condition prohibited by technical specifications has occurred, the key factor is not whether or not the condition existed prior to discovery, but on how long the condition existed, in order to determine whether the Required Action from the Technical Specifications have been met.</p> <p>To clarify the discussion, it is recommended that the phrase "... it is assumed that there was firm evidence that a condition prohibited by TS existed before discovery." in the third paragraph be revised to state ... "it is assumed that there was firm evidence that the condition existed, prior to discovery, for a time longer than permitted by the TS." The third sentence in the first paragraph in subsection (3), TS Surveillance Requirements, should be revised to state, "It should be assumed that the discrepancy occurred at the time of its discovery unless there is firm evidence, based on a review of relevant information (e.g., the equipment history and cause of failure), to indicate how long the discrepancy has existed." The second paragraph in subsection (3) should be deleted.</p>

<p>Section 3.2.2 (2), fourth paragraph on page 28</p>	<p>The purpose of this discussion is unclear. Operability decisions are made under somewhat different circumstances and time constraints than reportability. Once the operability call is made, decision relevant factors should be investigated to determine the appropriate response, including reporting.</p>
<p>Section 3.2.2 (3), page 28</p>	<p>Technical Specification Surveillance Requirements reference TS 4.0.2, which is no longer correct in regards to the Improved Standard Technical Specifications. The reference should be reviewed and made applicable also to those plants that have adopted the Improved Standard Technical Specifications. In addition, the third paragraph discusses actions to be taken following missed surveillances. These are also specifically addressed in the Improved Standard Technical Specifications, and the current NUREG-1022 discussion is not applicable for those plants that have adopted them. The document should reflect both existing and improved technical specifications.</p>
<p>Section 3.2.2 (5), page 29</p>	<p>The distinction between operations prohibited by Technical Specifications and straightforward administrative matters in determining reportability is not clear. To enhance the discussion, the following text is suggested to replace existing text on page 29:</p> <p>“Section 6 of the STS, or its equivalent, has a number of administrative requirements such as organizational structure, the required number of personnel on shift, the maximum hours of work permitted during a specific interval of time, and the requirement to have, maintain, and implement certain specified procedures. Failure to meet such administrative requirements is reportable only if it results in a violation of equipment operability requirements, or had a significant detrimental impact on the ability to safely operate the plant. If not, it can be considered an administrative matter, and need not be reported.”</p>
<p>Section 3.2.2 (6), page 30</p>	<p>It would be appropriate to emphasize in the discussion the fact that it is the details surrounding the event that require the entry into STS 3.0.3 that are the items of interest for the report, not the mere fact that STS 3.0.3 was entered. In addition, the STS 3.0.3 reference is no longer consistent with the Improved Standard Technical Specifications.</p>

Section 3.2.2 (7), page 30	The discussion references STS 4.0.5, addressing ISI and IST testing, which is no longer applicable to licensees who adopt the Improved Standard Technical Specifications. This should be noted in the discussions as an option.
Section 3.2.2, Example (4), page 31	In both paragraph 4 and 5, the guidance uses the terms 'substantial breakdown' and 'general failure.' This leads to some subjectivity in determining the reportability of these events, and without a clear meaning the potential for disagreements between licensees and inspectors concerning reportability is high.
Section 3.2.2, Examples, page 30 through 32	The examples contain several references to old standard technical specification terms that are no longer applicable to plants who adopt the Improved Standard Technical Specifications. This point needs to be made clear in the discussion.
Section 3.2.4, <u>Operating Plant in a Degraded or Unanalyzed Condition</u> , Discussion item (1)(f), page 35	Items (ii) and (iii) depict loss of containment isolation valve function and MSIV function as a loss of containment function or integrity. Loss of individual valve function does not meet the definition of being unanalyzed or outside design basis due to suitable redundancy in the safety function. In addition, individual containment isolation valves and MSIVs are controlled by appropriate required actions in the technical specifications. These two examples require additional discussion and clarification in order to make them applicable to this reporting criteria.
Section 3.2.4, Discussion item (b), page 36	The example given of the LaSalle power level oscillations as described in the paragraph seem to fit the discussion of the power plant being in an unanalyzed condition. Additional clarification is needed to ensure this is the appropriate reporting criteria.

<p>Section 3.2.4, Discussion (3), second paragraph, page 37</p>	<p>The discussion in this paragraph should more closely reflect the concept that being outside the design basis of the plant renders the system or train inoperable. It is suggested that the following text be substituted for the paragraph starting with the second sentence:</p> <p>“For example, in a two–train ECCS system, one train might be found with a design flaw that rendered the train inoperable or with a component that would never have functioned because it was installed incorrectly and a test that would reveal the problem was not performed. This would be considered outside the design basis of the plant because, for an extended period of time, the system did not have suitable redundancy. However, minor infractions such as (1) cases of technical inoperability, where a component is declared inoperable because a surveillance test is overdue, or (2) cases where the LCO allowed outage time is slightly exceeded, are not reportable under this paragraph. (These conditions may, however, be reportable as conditions prohibited by the Technical Specifications, 10 CFR 50.73[a][2][i][B]). Note that failures, specification problems, and loss of safety margins that apply to individual components, are not reportable unless they affect the ability to satisfy plant safety functions such that they place the plant outside its design basis. Thus reporting at component, system or structure level is dependent on if the event actually placed the plant outside its design basis.”</p> <p>In addition, there should be some additional discussion on the concept of an extended period of time as it applies to loss of redundancy. Some attempt at a definition or bounds to the concept of "extended period of time" should be given.</p>
<p>Section 3.2.4, Example (1), page 38</p>	<p>This example is actually an example of voluntary reporting, inadequate equipment control and entering a condition prohibited by technical specifications. It appears to be inappropriate for this section.</p>

<p>Section 3.2.4, Example (2), page 39</p>	<p>It is suggested that the example discussion on page 39 be rewritten as follows to emphasize the relationship between being outside the design basis and inoperable.</p> <p>“... leakage rate would be less than the capacity of the drywell nitrogen supply header valves, the 100-day supply of nitrogen was not adversely affected, and the systems in question remained capable of performing their intended safety functions. Thus the event was determined to be not reportable and the ENS notification was retracted.”</p>
<p>Section 3.2.7, <u>Loss of Emergency Assessment, Response or Communications</u>, page 46</p>	<p>The Emergency Operating Facility (EOF) should not be included in the second bullet under the discussion. Generally, the EOF is an off-site facility, with its own separate communication systems. All communication systems and assessment activities for off-site notifications and assistance can be performed via the Technical Support Center (TSC). It is recommended that the bullet be clarified to explain that the loss must encompass the capabilities of all Emergency Response Facilities.</p>
<p>Section 3.2.7, Example (1), page 48</p>	<p>It is suggested that the last sentence in the second paragraph be changed as follows to provide additional clarification:</p> <p>“No LER is required because there is no corresponding 10 CFR 50.73 requirement. Additionally, since the storm did not affect plant operations, the condition is not reportable as an external threat (10 CFR 50.73(a)(2)(iii)).”</p>
<p>Section 3.2.8, <u>Internal Threat Plant Safety</u>, page 50</p>	<p>In the second paragraph or is suggested that the word "particularly" be changed to "including" word 'particularly' tends to overemphasize, rather than encompass all applicable portable events.</p>

<p>Section 3.2.8, page 51</p>	<p>The discussion on the use of protective equipment and radiation work permits hampering or delaying safe operation of the plant needs further clarification. The use of radiation work permits is an accepted method of operation in many instances, and there must be a stronger tie to the hampering or delaying of actions that would normally be taken without the permits or protective clothing. Also, the time-critical aspect must be emphasized, as there are very few actions that are taken even in an emergency that are done without some deliberation and planning.</p> <p>For clarity the second bullet on page 51 should be rephrased as follow:</p> <p>“Precautionary evacuations are not reportable unless there is significant hampering. Actions such as room evacuations ...”</p>
<p>Section 3.3.1, <u>Shutdown Plant Found in Degraded or Unanalyzed Condition</u>, page 54</p>	<p>It is not clear that the number of defects directly related to a degradation in the fuel clad safety barrier, other than it was a high number. Reactor coolant fission product activity levels would be a more direct indication of degradation in this case.</p>
<p>Section 3.3.2, <u>Actuation of an Engineered Safety Feature or Reactor Protection System</u>, fourth full paragraph, page 57</p>	<p>This discussion requires additional clarification. In addition to shifting alignment of makeup pumps or closing a containment isolation valve for normal operations, starting a second HPI/makeup pump for normal post-trip inventory control would also be a deliberate manual action of ESF equipment in response to an actual plant condition. That is not an ESF actuation.</p>
<p>Section 3.3.2, page 58</p>	<p>In the first paragraph on the top of page 58, the discussion is not clear and should be rewritten. If the signal was valid enough such that all channels should have actuated, the event is reportable.</p>

<p>Section 3.3.2, last paragraph, page 59 to page 60</p>	<p>The staff is requesting licensees to voluntarily report actuation of all the systems identified in Table 2, regardless if the licensee has classified the system as an ESF or part of the Reactor Protection System (RPS). The reason given is to promote consistent reporting for a minimum set of safety systems. If a system has not been classified as an ESF system by a licensee, then actuation of that system does not meet the safety significance threshold of the regulation. The staff appears to be attempting to obtain system performance data, regardless of whether the system is safety significant or not. This extends the purpose of ESF reporting into an area not envisioned by the requirements of the rule. It is our opinion the Maintenance Rule will provide for appropriate system performance monitoring for those systems identified by Table 2. To discuss reporting of voluntary events, in this case even as a request and with the admittedly stringent controls given in the discussions on voluntary reporting, circumvents and extends the bounds of the NUREG.</p> <p>In addition, the discussion on voluntarily reporting systems identified in Table 2 does not explicitly eliminate invalid actuations consistent with other discussions. Additional clarification should be provided concerning voluntary reporting of invalid actuations for systems that are not considered ESF systems. Also, Control Room Emergency Ventilation is specifically exempted by regulation from invalid actuation notification, but there is no discussion of this in the Table or text.</p>
<p>Section 3.3.3, page 66</p>	<p>It is suggested that the first sentence in the second full paragraph be revised as follows, "These criteria cover an event or condition where structures or systems could have failed to perform their safety function ..." This is to more closely match the discussion in the regulations.</p>
<p>Section 3.3.3, page 66</p>	<p>The fifth paragraph defines the term 'safety function' and includes the phrase "required by the regulations." Additional discussion that relates safety function to that required by current licensing basis would clarify this discussion. Suggest replacing the word "regulation" with "current licensing basis."</p>

<p>Section 3.3.3, page 68</p>	<p>In the first bullet, replace the phrase "... generic problem (i.e., has common-mode failure implications)." in the first paragraph with the phrase "... a generic problem that could prevent fulfillment of the safety function." This clarification is to focus the reporting on the loss of safety function.</p> <p>In the second bullet, the phrase "an event or condition that disabled multiple trains of a system" may also be reportable under 10 CFR 50.73(a)(2)(vii). Some clarification or additional discussion is warranted.</p> <p>Additionally, it is suggested that the second sentence be rephrased to clarify the relationship to safety function as follows:</p> <p>"an event or condition where one train of a system is disabled if; (1) the underlying cause that disabled one train of a system could have failed a redundant train and (2) there is evidence that the system would not have been able to complete its safety function if called upon."</p>
<p>Section 3.3.3, page 69</p>	<p>In the first full paragraph, replace the fifth bullet with "the entire system or structure is specified as ESF or safety related if the plant safety analysis report relied on it to perform in order to ensure fulfillment of a safety function." This clarification is to properly focus the reporting criteria on the loss of safety function.</p>

<p>Section 3.3.3, <u>Examples</u>, page 70</p>	<p>An example is needed that clarifies the discussion on page 66, fourth paragraph, concerning additional single random failures not being assumed in that system. For example, during cold shutdown, two trains of a decay heat removal system are required to be operable, with one train in service. If the in-service train is inadvertently secured, one should not have to assume a failure to put the standby train in service. This condition would not be reportable under this criteria.</p> <p>Additionally, Examples (2) and (3) on pages 70 and 71, as written, imply that if a system is included in the Technical Specifications, it has a safety function as defined earlier. This may not be the case and the discussion should be clarified or rewritten to focus the reporting on the loss of the safety function required in an accident situation described in the safety analysis report.</p>
<p>Section 3.3.7, <u>News Release or Other Government Notification</u>. Example (3), page 89</p>	<p>A more realistic example of a fire that related to health and safety of the public would be a fire on the refueling bridge during fuel movement that necessitated contacting the local fire department.</p>
<p>Section 3.3.7, third paragraph, page 88</p>	<p>The discussion seems to indicate it is the <u>expectation</u> of public or media attention that warrants notification of the NRC. The paragraph should be clarified to emphasize it is notification of events related to health and safety for which a news release is planned that is the primary focus of reporting.</p>
<p>Section 4.1, <u>Emergency Notification System</u>. (3), Testing, page 96</p>	<p>This type of discussion is to related to event reporting guidelines. It is suggested that this information be transmitted to licensees via an update to the Information Notice, rather than in the NUREG.</p>
<p>Section 5.1.1, <u>Submission of LERs</u>, page 101</p>	<p>The discussion could be clarified by discussing the 30-day period ending on a non-working day, such as Saturday, Sunday, or a holiday. Also, to separate the clerical function from the review and approval, suggest that the word "mailed" be replace by "signed" in the first sentence in the first paragraph.</p>

<p>Section 5.1.10, <u>10 CFR 73.71 Reports</u>, page 105</p>	<p>Item 17 is not a block to mark, but rather the narrative description or text. It would be clearer to change the first sentence in the second paragraph to the following: "If the LER contains proprietary information, indicate such in the TEXT, item 17, of the LER form."</p>
<p>Section 5.2, <u>LER Content Requirements and Preparation Guidance</u>, page 105</p>	<p>NRC Form 366 should be updated to reflect the reporting requirements in 10 CFR 20 that were effective on January 1, 1994. In addition, the last sentence in the first paragraph, the underlined term 'all' would be clearer if modified by the term 'applicable.'</p>
<p>Section 5.2.1, (2), <u>Narrative Description or Text (NRC Form 366A, Item 17)</u>, page 110</p>	<p>For clarification, replace the first two paragraphs with the following:</p> <p>"Include the root cause(s) identified for each component or system failure (or fault) or personnel error. Contributing factors may be discussed as appropriate. For example, a valve stem breaking could have been caused by a limit switch that had been improperly adjusted during maintenance; in this case the root cause might be determined to be personnel error and additional discussion could focus on the limit switch adjustment. If the personnel error is determined to have been caused by deficient procedures or inadequate personnel training, this should be explained.</p> <p>If the cause of the failure cannot be readily determined and the investigation is continuing, the LER should indicate what additional investigation is planned. A supplemental LER should be submitted following the additional investigation if substantial information is identified that would significantly change a reader's perception of the course or consequences of the event, or if there are substantial changes in the corrective actions planned by the licensee."</p>
<p>Section 5.2.1, (4), <u>Corrective Actions</u>, page 115</p>	<p>The fourth paragraph states "Note any pertinent industry supported studies." This could be interpreted to include proprietary studies such as vendor analyses or design documents or documents such as INPO's Significant Operating Experience Reports and Significant Event Reports. The paragraph should be rephrased to clarify that only items that are publicly available and applicable to the LER event should be included.</p>

<p>Section 5.2.1, (4), <u>Corrective Actions</u>, page 115</p>	<p>The first paragraph requires that all corrective actions be reported, including those being tracked by the licensee's internal tracking system. This may be an extensive requirement that includes minor items or items not directly related to the event. Suggest the wording clarify that only major corrective action items that are directly related to the event be included in the LER. In addition, it should be emphasized that corrective actions are not considered commitments by many licensees, since a commitment is a management prerogative and not appropriate for LER purposes.</p> <p>The third paragraph requires the same information from the HPES evaluation. This also may be an extensive report with items and observations that do not directly relate to the event. There is no benefit in requiring additional HPES information, and the requirement should be deleted from the Section.</p>
<p>Section 5.2.4, <u>Other field on the form</u>, page 118</p>	<p>The text refers to the back side of the form. Most licensees use a text continuation or failure continuation pages, which would actually be number "2 of _."</p>
<p>Section 5.2.4, page 119</p>	<p>In addition to the guidelines for numbering presented in the first paragraph, security events reported pursuant to 10 CFR 73.71 should use a report number starting with the letter 'S.' If these events are reported on an LER form, it may be appropriate to include this guidance.</p>
<p>Editorial Comments on Various pages</p>	<p>Page 14, third paragraph – In the first sentence in subparagraph 3, replace "... seriously compromises plant safety" with "... significantly compromises plant safety."</p> <p>Page 24, fourth paragraph under <u>Discussion</u> — In the first sentence, replace "...plant enters the first shutdown condition ..." with "... plant enters the first sub-critical condition ..."</p> <p>Page 25, Example (3) — Replace the title with "Failure that was or could have been corrected before expiration of an LCO time limit requiring a plant shutdown."</p>

<p>Editorial comments (continued)</p>	<p>Page 29, subsection (5), first paragraph – The last sentence should read “ ... then <i>it is</i> reportable.”</p> <p>Page 30, Discussion (8) — Replace the phrase “When fire protection systems are covered by TS (e.g., through an LCO) ... ” with the phrase “When operability requirements for fire protection systems are specified in a TS LCO.”</p> <p>Page 31, Example (5) — The first sentence should read “Examples of potentially reportable conditions ... ”</p> <p>Page 32, Example (6) — In the first sentence, the phrase “ ... within the required time frame” should be modified by the phrase “specified in the TS LCO.”</p> <p>Page 37, subsection (3), second paragraph — The third sentence should read “ ... because, for <i>an extended period of time</i>, the system ...”</p> <p>Page 41 – The partial sentence at the top of the page should be modified to state “ ... transportation accident which occurs near the site, creating an actual threat to plant safety, should be reported.”</p> <p>Page 41, third full paragraph — The second sentence should read “ ... operate <i>safely</i>, the threat is ... ”</p>
---	---

<p>Editorial comments (continued)</p>	<p>Page 44, first paragraph under <u>Discussion</u> — Replace the third sentence with “Those events that result in either a valid automatic or manual actuation of the ECCS with discharge into the RCS or would have resulted in a valid activation of the ECCS with discharge into the RCS or would have resulted in activation of the ECCS if some component had not failed or an operator action had not been taken are reportable.” Also, in the fourth sentence, replace the phrase “ ... a valid ECCS signal was generated by plant conditions ... ” with the phrase “ ... a valid ECCS signal was generated by plant conditions and would have resulted in ECCS discharge into the RCS.”</p> <p>Page 44, second paragraph — Replace the last sentence with “However, such events may be reportable under other criteria, 10 CFR 50.72(b)(2)(ii) and 10 CFR 50.73(a)(2)(iv).” Also, in the second sentence, replace “ ... preplanned test” with “...preplanned sequence.”</p> <p>Page 63, Example (9) — In the third paragraph, replace the phrase “...unexpected ESFs...” with the phrase “...unexpected ESF actuations ...”</p> <p>Page 75, second paragraph under Comments: — The correct reference in brackets should be 10 CFR 50.72(a)(2)(v) or 10 CFR 50.72(a)(2)(vii).</p> <p>Page 75, first bullet — The second sentence should read “ ... reported if they <i>are</i> experienced ... ”</p> <p>Page 76, subsection 15, first paragraph — Delete the words “annual inspection” in the third sentence.</p> <p>Page 81, Example (3) — In the second paragraph, revise the last sentence to read, “The potential existed for numerous snubbers in several systems to fail following a seismic event, rendering independent trains inoperable.”</p> <p>Page 84, second paragraph under the <u>Discussion</u> — the word “divide” should be “multiply” for normalizing a 15 minute release.</p>
---	--