POLICY ISSUE

(NEGATIVE CONSENT)

April 1, 1994

SECY-94-093

FOR: The Commissioners

FROM: James M. Taylor
Executive Director for Operations

SUBJECT: NRC STAFF ASSESSMENT OF REPORTING REQUIREMENTS FOR POWER REACTOR LICENSEES

PURPOSE:

To inform the Commission about the activities of the task force formed to assess reporting requirements for power reactor licensees, including plans for evaluating the need or frequency for reporting requirements contained in the regulations, technical specifications or industry codes and standards, commensurate with the implementation plan for the Regulatory Review Group recommendations (SECY-94-003).

SUMMARY:

This paper describes the activities of a task force to determine if some reporting requirements imposed on power reactor licensees can be reduced in scope or eliminated. As part of this effort, the task force selected a test group of 11 reporting requirements for review to develop a means for documenting staff rationale when assessing reporting requirements. The approach for continuing the effort to assess reporting requirements that the industry and the NRC staff identified for possible deletion or revision is discussed; the schedule for accomplishing this is compatible with Topic Area No. 59 (Reporting Requirements) of the implementation plan for the Regulatory Review Group recommendations. Also, the staff will initiate rulemaking or take other appropriate regulatory actions based on the recommendations of the Regulatory Review Group and the Reporting Requirements Task Force, and will investigate the efficacy of applying electronic transmission techniques for data, reports and test results.

NOTE: TO BE MADE PUBLICLY AVAILABLE WHEN THE FINAL SRM IS MADE AVAILABLE

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BACKGROUND:

In mid-January 1992, the Chairman asked the staff to review the reporting requirements imposed on power reactor licensees to determine if some requirements could be reduced in scope or eliminated. Shortly thereafter, two Presidential directives, dated January 28, 1992, requested that the Commission and other energy and environmental agencies work together to streamline regulatory requirements and set aside a 90-day period for the evaluation of existing regulations. The Commission directed the Committee to Review Generic Requirements (CRGR) to use appropriate inputs from the public, the NRC staff, and other Federal agencies to conduct a special regulatory review addressing the spirit of the concerns raised by the President. After completing its review, the CRGR recommended revising the regulations in eight areas (SECY-92-141, dated April 17, 1992) for which the CRGR could clearly make a determination in the allotted 90 days that a reduction in the regulatory burden could be achieved without in any way reducing the public health and safety or common defense and security.

In conducting its review, the CRGR issued a Federal Register notice on February 24, 1992 (57 FR 6299), seeking public comment, and also sought comments from the NRC staff; the CRGR held a public meeting to discuss the comments that were received. Among other concerns, the industry considered the magnitude of reporting requirements to be burdensome and some reporting requirements to be unnecessary. In addition, the industry expressed concern over NRC guidance documents issued to provide interpretations of reporting requirements in the regulations and over reporting requirements contained in license documents such as the technical specifications. Because many of the comments received were outside the scope or criteria of the special CRGR review, their resolution was deferred to other agency initiatives for evaluating reporting requirements. Therefore, the staff decided to expand the scope of this effort, and consider the potential for reducing reporting requirements in a comprehensive and integrated manner.

In a memorandum from the Executive Director for Operations, dated May 7, 1992, the staff described plans for (1) soliciting the views of the nuclear power industry and other interested parties on reducing reporting requirements and (2) issuing a report with staff recommendations on modifying certain reporting requirements and conducting an expanded review of the reporting requirements for power reactor licensees. Public comment was obtained through the issuance of a Federal Register notice (57 FR 27394, dated June 19, 1992); the comment period expired September 30, 1992. Enclosure 1 identifies those who commented and characterizes the comments that were received.

A multi-office task force was established to support this effort. The members of the task force are given in Enclosure 2. To facilitate staff involvement, the task force developed a User Need Statement form for the staff to use in developing the justification for reporting requirements. To affirm the utility of the User Need Statement, the task force identified a test group of 11 reporting requirements for evaluation by the staff. Enclosure 3 includes (1) a list of the 11 reporting requirements that comprise the test group,

along with the User Need Statements prepared by the cognizant line organizations, (2) a compilation of the results from the User Need Statements and (3) comment resolution statements for those public comments received in response to the Federal Register notice that are related to the test group of reporting requirements. The task force met in January 1993 to discuss various approaches for continuing the review of the reporting requirements and to evaluate the need to modify the User Need Statements.

In January 1993, the Executive Director for Operations established the Regulatory Review Group (RRG). The RRG conducted a disciplined review of power reactor regulations and related processes, programs and practices. The findings and recommendations of the RRG focused on identifying specific problems, their cause, and achievable solutions. In August 1993, the RRG issued its final report containing recommendations aimed at reducing the regulatory burden on power reactor licensees and strengthening NRC administrative practices. The RRG report discussed several key areas in which changes in the way NRC conducts business could significantly reduce industry and NRC staff costs without adversely affecting the level of safety at operating plants. In examining agency administrative practices, one of the areas proposed by the RRG for possible efficiencies was the area of reporting requirements.

The staff prepared an implementation plan for the recommendations of the RRG (SECY-94-003, dated January 7, 1994). The plan contains general implementation strategies, priorities, major milestones and target schedules for the timely resolution of the recommendations. In this regard, the resolution approach being recommended by this task force for the review of the reporting requirements for power reactor licensees is compatible with the implementation plan for the RRG recommendations.

DISCUSSION:

Public comments that have been received in response to Federal Register notices soliciting the views of the nuclear power industry and other interested parties on reducing regulatory burdens and reporting requirements suggest a need for the NRC staff to look at power reactor reporting requirements. The comments stated that the NRC staff is in a better position than the industry to judge whether certain reporting requirements are still needed. If the NRC is to conduct a comprehensive review of its reporting requirements, which would involve substantial resources from the line organizations, the NRC must adopt an efficient and effective approach.

Irrespective of the approach that is adopted to reassess reporting requirements, the staff will need to document the rationale for the conclusions it reaches. This will help ensure that safety objectives are adequately addressed and that consistent decisions are made. Therefore, a User Need Statement was prepared for use in documenting the justification for reporting requirements and recommendations for change. The utility of the User Need Statement was affirmed by having the task force members apply it to a test group of 11 reporting requirements. The User Need Statements were then

sent to the appropriate line organizations for further development. If the views of the task force differed from those expressed by the responsible line organization, the task force discussed them with the line organization, and the User Need Statement was revised to reflect a staff concensus.

The User Need Statement is considered to be an effective tool for use by the staff to document, in a consistent manner, the rationale for retaining reporting requirements or recommending changes, including the deletion of reporting requirements. However, in applying the User Need Statement to the test group, the task force noted that there were various interpretations of the information requests. As a result, the User Need Statement was revised to enhance its usability; the revised form is provided in Enclosure 4.

The reporting requirements comprising the test group were selected because (1) they came from several sources (namely, the regulations, the technical specifications, and Section XI of the ASME Code, which is incorporated by reference into 10 CFR Part 50); (2) they were addressed by the Nuclear Management and Resources Council (NUMARC) in their response to the June 19, 1992 Federal Register notice; (3) they involve several NRC line organizations; (4) a spectrum of recommendations concerning the disposition of the reporting requirements would likely result; and (5) they would give an indication of the level of effort needed to prepare User Need Statements for other reporting requirements.

The results of the task force review of the test group of reporting requirements are presented in Enclosure 3. The line organizations or the task force recommended that four of the reporting requirements be eliminated (Items 1, 4, 5, and 7 in Table 1 of Enclosure 3), that five of the reporting requirements be revised or further explained to reduce their scope (Items 2, 8, 9, 10 and 11), and that two of the reporting requirements be retained as currently stated (Items 3 and 6).

Several insights were gained from the evaluation of the 11 test case reporting requirements that will be factored into the follow-on effort addressed in this paper to reduce regulatory burden; for example:

1. The line organizations are best qualified to prepare the justification for the retention, elimination, or revision of reporting requirements; they can provide a safety perspective that is essential to sound decisionmaking.

2. There is frequently more than one organization using the information being reported, and it is not always obvious which line organization should be asked to exercise control over the destiny of a reporting requirement. Therefore, the use of a short term task group to assign organizational ownership for each reporting requirement is desirable.

3. The NRC should investigate the application of electronic transmission techniques for data, reports, and test results as part of its strategic information technology planning process.

Following is a discussion of the approach and schedule for continuing the effort to assess reporting requirements for power reactor licensees which the industry and the NRC staff identified for possible deletion or revision. The line organizations will be required to allocate resources to conduct detailed reviews of the reporting requirements within their purview and proceed with rulemaking or other appropriate licensing actions (e.g., generic letters for line item improvements to the Standard Technical Specifications that pertain to reporting requirements) to reduce reporting burdens.

No oversight group will be associated with this approach, although an initial effort by a small task group will be necessary to (a) compile the reporting requirements identified by the Regulatory Review Group and the respondents to the aforementioned Federal Register notices as being unduly burdensome, duplicative, or otherwise unnecessary and in need of revision, (b) assign office/division ownership to the reporting requirements contained in the regulations, the Technical Specifications, generic communications, plant operating licenses and licensee controlled documents, and (c) prioritize office/division assignments and propose interim milestones for assignments that are compatible with the overall schedule (discussed below) to permit periodic assessments of progress.

The overall schedule for the effort will be in keeping with the implementation plan for the Regulatory Review Group recommendations. The line organizations will complete the assessment of the body of reporting requirements identified in the public comments and in the Regulatory Review Group implementation plan (SECY-94-003) by December 1995. The Office of Nuclear Regulatory Research (RES) will prepare draft rule changes for presentation to the Commission prior to the end of June 1996, and will publish final versions prior to the end of December 1996. The line organizations will undertake other appropriate licensing actions to address changes in the reporting requirements that do not involve rule changes prior to the end of December 1996.

In parallel with the effort to continue the review of NRC reporting requirements to eliminate duplicate requirements and information/data requirements without a clear nexus to safety, NRC staff will take the following actions based on the recommendations of the Regulatory Review Group and the Reporting Requirements Task Force:

- The Office of Nuclear Regulatory Research (RES) will be requested to initiate rulemaking to address the following matters:

  1. Eliminate 10 CFR 73.71(c)(2), which requires the quarterly submittal of safeguards event logs.

  2. Revise 10 CFR 55.25 to eliminate the notification of operator incapacity due to a disability or illness and refer to a similar reporting requirement under 10 CFR 50.74(c) for this requirement.

3. Revise 10 CFR 50, Appendix J to eliminate the requirement to submit the summary technical reports of preoperational and periodic leakage rate tests; rather, require the reports to be made available at the plant sites for NRC review.

The proposed schedule for accomplishing the above rulemaking actions is compatible with the plan for implementing the RRG recommendations (SECY-94-003), namely, the staff will provide draft rule changes to the Commission prior to the end of September 1994 and will publish final rule changes prior to the end of February 1995.

- Since the ASME Code is endorsed by NRC regulations (see 10 CFR 50.55a), the NRC will take a proactive role through its representatives on the ASME Code committee to modify code reporting requirements to reduce licensee burden; in particular, the NRC will propose to eliminate the need to submit inservice inspection (ISI) reports to the NRC following each refueling outage (ASME Code Section XI, Article IWA-6000).

- RES will be requested to revise the monthly operating report (Regulatory Guide 1.16), which plant Technical Specifications require licensees to submit, to eliminate currently reportable information that is not essential to the Performance Indicator Program or that may be available from another source.

  The proposed schedule for accomplishing this will be in keeping with the implementation plan in SECY-94-003; the staff will publish a draft of the revised regulatory guide prior to the end of June 1994, and the final regulatory guide will be published prior to the end of January 1995.

This review of the reporting requirements for power reactor licensees is in keeping with the expectations of the industry, as expressed in the letters received in response to Federal Register notices. These letters contain a recurring theme, namely, that while the nuclear power industry can provide its views on the impact of certain reporting requirements, it is up to the NRC to properly identify the information that is required to fulfill its obligation to protect the health and safety of the public and to propose appropriate changes. Therefore, the expectation of the industry is that the NRC will continue to conduct reviews of its reporting requirements and evaluate the need for prescribed reports and the information they contain.

COORDINATION:

The Office of General Counsel has reviewed this paper and has no legal objections.

RECOMMENDATIONS:

That the Commission note that, absent other directions after 10 working days:

1. The line organizations will proceed to assess the reporting requirements for power reactor licensees which the industry and the NRC staff have identified for possible deletion or revision, and to initiate proposed rulemaking or other appropriate regulatory actions on a schedule that is compatible with SECY-94-003 recommendations for Topic Area No. 59.

2. RES will be requested to initiate a combined rulemaking, and cognizant line organizations will initiate appropriate generic communications based on the initial recommendations of the Regulatory Review Group and the Reporting Requirements Task Force.

3. NRC staff will investigate the efficacy of applying electronic transmission techniques for data, reports, and test results. This will be done in conjunction with the development of the information technology plan for the agency.

James M. Taylor
Executive Director
for Operations

Enclosures:
1. Respondents to Federal Register Notice Solicitation for Public Comment
2. Task Force to Review Reporting Requirements for Power Reactor Licensees
3. Test Group of Reporting Requirements Selected for Evaluation
4. User Need Statement for NRC Power Reactor Reporting Requirements

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Monday, April 18, 1994, that the Commission, by negative consent, assents to the action proposed in this paper.

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RESPONDENTS TO FEDERAL REGISTER NOTICE SOLICITATION FOR PUBLIC COMMENT

In response to the Federal Register notice soliciting public comment (57 FR 27394, dated June 19, 1992), the NRC received comments from 15 respondents. Their comments are characterized below.

1. Letter from Marvin I. Lewis, dated July 27, 1992.

   Respondent expressed general dissatisfaction with NRC attempts to reduce the reporting burden imposed on licensees. Respondent contends that "the reduction or elimination of paperwork for licensees does not provide any protection of the health and safety of the public."

2. Letter from Winston & Strawn on behalf of the Nuclear Utility Backfitting and Reform Group (NUBARG) and Public Service Electric and Gas Company, dated September 30, 1992. The comments submitted were endorsed by the Boiling Water Reactor Owners Group.

   NUBARG commented that a number of NRC reporting requirements are duplicative and non-essential, but chose to focus on a few widely applicable reporting requirements that it feels should be revised or eliminated. NUBARG also proposed specific changes to these reporting requirements that include the following:

   (a) Further amending 10 CFR 50.71(e) by allowing licensees to update the Final Safety Analysis Report (FSAR) on a schedule that has been negotiated with the NRC or absent such an agreement, in accordance with current provisions but with additional relaxations on filing within 9 months after refueling outage instead of present requirement of 6 months after refueling outage. Corresponding changes to other regulations that address updating the FSAR would also have to be made.

   (b) Amending 10 CFR 50, Appendix I, to delete the 30-day report in favor of referencing more explicit reporting requirements found elsewhere in the regulations, facility Technical Specifications and Offsite Dose Calculation Manual (ODCM), and changing the threshold for reporting from exceeding the annual design objective by one-half to exceeding specific regulatory limits found in the regulations, facility Technical Specifications and ODCM.

   (c) Amending 10 CFR 21.7 to exempt Part 50 power reactor licensees from reporting "failures to comply" under Part 21 since other reporting provisions, e.g., 10 CFR 50.9, 50.72, 50.73, and 73.71, are more effective in ensuring that a failure to comply with applicable regulations when substantial safety hazards are involved would be reported.

(d) Amending 10 CFR 50.4 to require applicants to submit only the original and three copies of an application for a construction permit or operating license, or amendments to such applications, rather than the original and 37 copies.

NUBARG commented that 10 CFR 50.72 and 50.73 should be amended to clarify reporting obligations. This would ease the reporting burden on licensees by consolidating existing NRC guidance and simplifying reportability evaluations.

NUBARG also commented that the NRC should periodically re-evaluate the justification for each reporting requirement, and that the backfitting rule (10 CFR 50.109) should be applied to the promulgation of all new reporting requirements.

3. Letter from the Nuclear Management and Resources Council (NUMARC), dated September 30, 1992.

NUMARC submitted a substantial set of comments, and like several other respondents, encouraged the NRC to conduct a comprehensive review of all existing reporting requirements to determine the need for the reports and the information they contain.

The NUMARC submittal describes in detail specific areas of reporting requirements that NUMARC recommends for further detailed evaluation. The areas of discussion are as follows:

(a) reporting requirements for a typical nuclear power plant (181 reporting requirements from 10 CFR were listed);

(b) specific recommendations for changes to regulations (44 reporting requirements from 10 CFR were listed);

(c) specific reporting requirements and comments on technical specifications (sample list of 45 reporting requirements from technical specifications that most licensees have in common);

(d) specific comments on 10 CFR 50.72 and 10 CFR 50.73 reporting requirements, and draft NUREG-1022, Revision 1, "Event Reporting Systems, 10 CFR 50.72 and 50.73;"

(e) specific comments on 10 CFR 21, reporting of defects and noncompliances;

(f) specific reporting requirements and comments on 10 CFR 73.71, reporting of safeguards events.

NUMARC also recommended that the NRC reassess the number of copies of documents that are required to be submitted under 10 CFR 50.4, and to investigate the use of electronic means to transmit routine reports.

4. Twelve other industry respondents* provided comments generally endorsing the comments provided by NUBARG (item 2 above) and/or NUMARC (item 3 above). Some of these 12 commenters further emphasized changes to reporting requirements of the following regulations:

10 CFR 26.71	Recordkeeping Requirements of Fitness-for-Duty Rule
10 CFR 50.36	Technical Specifications Reporting Requirements
10 CFR 50.46	Reporting the Errors Discovered in Models for Evaluating the Emergency Core Cooling Systems
10 CFR 50.72	Immediate Notification Requirements
10 CFR 50.73	Licensee Event Reports
10 CFR 73.71	Reporting of Safeguards Events

Duke Power Company further emphasized the following candidates for reducing reporting requirements:

1. Routine reports that are submitted for information only
2. Reports of the results of routine and pre-planned surveillance and/or testing
3. Reports of events with low threshold
4. Duplicate reporting requirements

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* 1. Letter from **Omaha Public Power District**, dated August 17, 1992.

2. Letter from **Detroit Edison**, dated September 30, 1992.

3. Letter from the **BWR Owners Group**, on behalf of its member utilities, dated September 30, 1992.

4. Letter from **Virginia Power**, dated September 30, 1992.

5. Letter from the South Carolina Electric and Gas Company, dated September 29, 1992.

6. Letter from Entergy Operations, Inc., dated October 5, 1992.

7. Letter from Florida Power and Light Company, dated September 30, 1992.

8. Letter from Georgia Power Company, dated September 29, 1992.

9. Letter from Yankee Atomic Electric Company, dated October 1, 1992.

10. Letter from Duke Power Company, dated September 28, 1992.

11. Letter from Southern Nuclear Operating Company, dated September 25, 1992.

12. Letter from Consolidated Edison Company of New York, Inc., dated October 13, 1992.

ENCLOSURE 1

TASK FORCE TO REVIEW REPORTING REQUIREMENTS

FOR POWER REACTOR LICENSEES

1. Brian K. Grimes, Task Force Chair
   Division of Operating Reactor Support, NRR

2. James W. Shapaker
   Division of Operating Reactor Support, NRR

3. Mohan C. Thadani
   Project Directorate II-4, NRR

4. Abraham L. Eiss
   Program Management, Policy Development and Analysis Staff, NMSS

5. Joan Higdon
   Division of Fuel Cycle Safety and Safeguards, NMSS

6. Cheryl A. Trottier
   Division of Regulatory Applications, RES

7. Marcel R. Harper
   Division of Safety Programs, AEOD

8. Brenda J. Shelton
   Division of Information Support Services, IRM

9. James C. Linville
   Region I

10. Richard V. Crlenjak
    Region II

11. Robert W. De Fayette
    Region III

12. Phillip H. Harrell
    Region IV

13. Dennis F. Kirsch/Lewis F. Miller
    Region V

ENCLOSURE 2

TEST GROUP OF REPORTING REQUIREMENTS SELECTED FOR EVALUATION

1.	ASME Code	Inservice Inspection summary report, required by IWA-6220 to be submitted within 90 days of the completion of each refueling outage (DE/NRR)
2.	10 CFR 50.59(b)(2)	Annual reports of facility changes, tests, and experiments (recently changed to refueling basis) (ADPR/NRR)
3.	10 CFR 70.9(b)	Notification within two working days of information having significant implication for public health and safety or common defense and security (FCSS/NMSS)
4.	10 CFR 73.71(c)(2)	Quarterly safeguards event log entries report (DRSS/NRR and FCSS/NMSS)
5.	10 CFR 50.74	Notification of change of operator status due to transfer, termination or disability (DRCH/NRR)
6.	10 CFR 50, Appendix I, Section IV.A.3	Report on higher than normal release rates (DRSS/NRR)
7.	10 CFR 50, Appendix J, Section V.B	Containment Integrated Leak Rate Test summary technical report (DSSA/NRR)
8.	TS 4.4.5.5(a)	Summary report of SG tubes plugged (DE/NRR)
	TS 4.4.5.5(b)	Results of SG tube inservice inspection (DE/NRR)
	TS 4.4.5.5(c)	Special Report of SG tube inspection results that fall in Category C-3 (DE/NRR)
	TS 4.4.5.5(d)	Results of SG tube inspection for which alternate tube plugging criteria were used (DE/NRR)
9.	TS 6.9.1.3	Cycle Startup Report (DSSA/NRR)
10.	TS 6.9.1.4	Annual Operating Report (DRSS/NRR)
11.	TS 6.9.1.8	Monthly Operating Report (including refueling data and PORV/safety valve challenges) (DSP/AEOD)

ENCLOSURE 3

Table 1 (ENCLOSURE 3)

SUMMARY OF ANALYSIS OF SELECTED REPORTING ISSUES

ISSUE NUMBER	REPORTING REQUIREMENT	LINE ORGANIZATION RECOMMENDATION	TASK FORCE RECOMMENDATION
1	ASME Code Section XI, Article IWA-6000: Requires summary ISI report to be submitted within 90 days of the completion of each refueling outage; ASME Code endorsed by NRC regulations (see 10 CFR 50.55a).	DE/NRR: The NRC should take a proactive role through its representatives on the ASME Code committee to modify code reporting requirements, to (1) reduce licensee burden and (2) eliminate need to send ISI report to the NRC.	Agree
2	10 CFR 50.59(b)(2): Requires report of changes, tests and experiments to be submitted to the NRC annually or at such shorter intervals as may be specified in the license.	ADPR/NRR: This reporting requirement should not be eliminated. The staff should notify the licensees by a generic letter that the submittal of these reports may be timed to coincide with the FSAR update, and what scope and format is most useful to the staff.	Agree
3	10 CFR 70.9: Requires that the Commission be notified of information identified by the applicant or licensee as having for the regulated activity a significant implication for public health and safety or common defense and security. (A comparable statement appears in 10 CFR 50.9 for Part 50 applicants/licensees.)	FCSS/NMSS: Recommend no change since the rule is not applicable to information which is required to be provided to the Commission by other reporting or updating requirements (e.g. 10 CFR 50.9)	Agree

SUMMARY OF ANALYSIS OF SELECTED REPORTING ISSUES
(CONTINUED)

ISSUE NUMBER	REPORTING REQUIREMENT	LINE ORGANIZATION RECOMMENDATION	TASK FORCE RECOMMENDATION
4	10 CFR 73.71(c)(2): Every three months each licensee shall submit one copy of all safeguards event log entries not previously submitted to the NRC.	DRSS/NRR and FCSS/NMSS: Continuing to require power reactor licensees to record security event information is appropriate. However, public health and safety would not be compromised if safeguards event logs were no longer submitted to the NRC.	Agree
5	10 CFR 50.74: The licensee will notify the NRC within 30 days of operator licensing issues covered by 10 CFR 55 regarding: (a) permanent reassignment to nonlicensed duties; (b) termination of operating license; (c) disability or illness as described in 10 CFR 55.25.	DRCH/NRR: Revise 10 CFR 55.25 to eliminate the notification of operator incapacity due to a disability or illness and refer to a similar report required under 10 CFR 50.74(c) for this requirement.	Agree

SUMMARY OF ANALYSIS OF SELECTED REPORTING ISSUES
(CONTINUED)

ISSUE NUMBER	REPORTING REQUIREMENT	LINE ORGANIZATION RECOMMENDATION	TASK FORCE RECOMMENDATION
6	10 CFR 50, Appendix I, Section IV.A.3: Requires repo ting of effluent releases to unrestricted areas during any calendar quarter which result in exceeding one-half the design objective annual exposure, within 30 days from the end of the calendar quarter in which the release occurred.	DRSS/NRR: Do not change this reporting requirement because it is the principal means by which NRC learns about radiological effluent management problems at plant sites; elimination of this report can have adverse impact on public health and safety.	Agree
7	10 CFR 50, Appendix J: Requires preoperational and periodic leakage rate tests to be the subject of a summary technical report submitted to the Commission, as specified in 10 CFR 50.4, about 3 months after the conduct of each test.	DSSA/NRR: Reporting of leakage rate tests to the NRC may be eliminated, but test reports should be made available at plant sites for NRC review.	Agree

SUMMARY OF ANALYSIS OF SELECTED REPORTING ISSUES
(CONTINUED)

ISSUE NUMBER	REPORTING REQUIREMENT	LINE ORGANIZATION RECOMMENDATION	TASK FORCE RECOMMENDA-TION
8	TS 4.4.5.5 a, b, c, & d: These technical specifications relate to reports of steam generator tube plugging, results of inservice inspections, and special reports of certain inspections where alternate tube plugging criteria were used.	DE/NRR: The information required in these reports is necessary in order to monitor the industry trends. Recommend that guidance be developed to streamline reporting burden, and that electronic receipt of information be evaluated.	Agree
9	TS 6.9.1.3 - Cycle Startup Reports: This technical specification requires that licensees report the results of their Power Ascension Testing Program to the NRC.	DSSA/NRR: Pertinent information is entered into an NRC database and calculational discrepencies are investigated. Recommend that guidance for a simpler, tabular format be developed, and TS be changed to eliminate misunderstanding when report is required.	Agree
10	TS 6.9.1.4 - Annual Operating Report: This technical specification requires licensees to provide an annual report covering the activities of each operating unit. The report includes occupational radiation exposure data categorized by work and job functions.	DRSS/NRR: Retain TS reporting requirement; it is the only source of dose information categorized by work and job function that is available to the NRC. Evaluate electronic means of data transfer to ease reporting burden.	Agree

SUMMARY OF ANALYSIS OF SELECTED REPORTING ISSUES
(CONTINUED)

ISSUE NUMBER	REPORTING REQUIREMENT	LINE ORGANIZATION RECOMMENDATION	TASK FORCE RECOMMENDATION
11	TS 6.9.1.5 - Monthly Operating Reports: Licensees are required to submit Monthly Operating Reports to the NRC, summarizing the plant operating statistics, planned outages and power reductions, and other information, such as unit capacity and limiting power generation.	DSP/AEOD: Monthly Operating Reports (MORs) should not be deleted and the frequency of reporting should not be changed. These reports are the only source of much of the information needed to document plant performance history. The elimination of this requirement will not result in significant cost savings.	Retain MORs, but eliminate reportable items that are not essential to Performance Indicator Program, or that are available from another source. (Note: IRM indicates that other items in MORs may need to be retained based on prior information requests from staff/public; when TS is revised, IRM must prepare User Need Statement justifying retention of other reportable items.)

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

   Section XI of the ASME Code is incorporated by reference into 10 CFR 50 and the Standard Technical Specifications. Licensees have referenced the subject reporting requirements in their FSAR, Quality Assurance Manual and other documents.

   Article IWA-6000 of ASME Section XI requires that a summary report be submitted to the regulatory* and enforcement* authorities having jurisdiction at the plant site within 90 days of the completion of each refueling outage. This summary report must describe the inservice inspection (ISI), tests, repair or replacement of ASME Code Class 1, 2, and 3 components that were conducted during the outage.

2. Type of report: routine report

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now

   One of the original objectives of the reporting requirement was to involve the Authorized Inspection Agencies* and the Authorized Nuclear Inservice Inspector (ANII)* in the oversight process. This was accomplished by the requirement in Article IWA-6000 that a form NIS-1, "Owner's Report for Inservice Inspection," be signed by the Owner and ANII to certify that the examinations and corrective actions in the summary report were completed.

   Another purpose of the report is to assure the integrity of code components by reviewing examinations performed, conditions observed, and corrective measures recommended and taken.

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*Definitions from Article IWA-9000, "Glossary," are attached.

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)
   The RIDS Code for the report is A047D.
   -- Regional Administrator
   -- Resident Inspector
   -- Records Management
   -- NRR Project Manager

5. Organization(s) using the report

   The organizations using the report are the Materials Section of the Engineering Branch of the Division of Reactor Safety in the regions and the Materials and Chemical Engineering Branch in the Office of Nuclear Reactor Regulation.

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

   -- There are no prescribed plant specific/generic actions taken by the staff upon receiving the reports, but, as appropriate, may be used to verify that examinations are appropriate and repairs are adequate.

7. Identify routine analyses performed/staff reports generated, based on the report received

   Currently these reports are occasionally reviewed by inspectors in the office to prepare for core ISI inspections, or reviewed at the site during the inspections.

8. Estimate the resources (staff hours/contract dollars) expended per report

   A maximum of one hour per report is expanded upon receipt.

9. Identify similar/related reporting requirements

   It may be possible to encompass the steam generator tube summary reports required by Standard Technical Specifications 4.4.5.5.a and 4.4.5.5.b into the ISI summary report. However, the ASME Code and some licensees consider the examination of steam generator tubes to be exclusively a Technical Specification requirement. Therefore, data on steam generator tubes are not contained in all ISI summary reports submitted for PWR plants.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

- Based on existing ASME Code requirements, licensees may prepare and publish the summary report regardless of NRC requirements. The report may be required to meet certain state boiler code laws and insurance requirements.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective

    - There is currently an ASME Code committee working to standardize the report format, reduce the report volume and require a detailed report only after each 40 month period with a shorter summary report after each inspection.

    - The use of an electronic form could simplify and streamline reporting.

    - Eliminate the report to the NRC; this would require either a rule change to 10 CFR 50.55a(g) to exempt licensees from an ASME Code requirement, or ASME Code committee action to revise the reporting requirements.

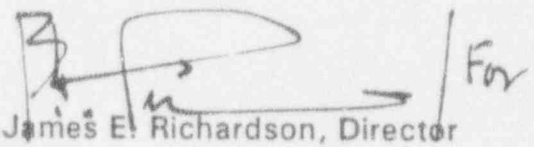
12. NRC resource cost or savings based on modifying the reporting requirement

    The current savings to NRC would be about 2 staff weeks of inspector review time per year for all plants.

    NRR believes that we should be spending more staff time reviewing and trending data to properly fulfill our role as the code regulatory authority. However, we have gotten by without such trending for many years and have managed to characterize generic ISI program concerns without it to date.

13. Management Recommendation(s)

    The NRC should take a proactive role through its representatives on the ASME Code committee to modify the reporting requirements to (1) eliminate the requirements to send the ISI Report to the NRC and (2) reduce licensee burden while continuing to meet safety objectives and the needs of state authorities, insurance agencies and other parties having an interest in the process. (See Item 11).



James E. Richardson, Director
Division of Engineering
Office of Nuclear Reactor Regulation

ATTACHMENT

Definitions from IWA-9000, "Glossary," of ASME Section XI

Authorized Inspection Agency -- an organization that is empowered by an enforcement authority to provide inspection personnel and services as required by this Section.

Authorized Nuclear Inservice Inspector -- a person who is employed and has been qualified by an Authorized Inspection Agency to verify that examinations, tests, and repairs (that do not include welding or brazing) are performed in accordance with rules and requirements of this Section.

enforcement authority -- a regional or local governing body, such as a State or Municipality of the States or a Province of Canada, empowered to enact and enforce Boiler and Pressure Vessel Code legislation.

regulatory authority -- a federal government agency, such as the United States Nuclear Regulatory Commission, that is empowered to issue and enforce regulations affecting the design, construction, and operation of nuclear power plants.

TEST CASE 2

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

   In 10 CFR 50.59(b)(2), NRC requires that the licensee shall submit a report containing a brief description of any changes, tests, and experiments, including a summary of the safety evaluation of each.

2. Type of report:

   a. Routine Report (Documents summaries of safety analysis reports supporting the design changes, tests, and experiments performed by the licensee)

      (i) Required once per refueling outage.

      (ii) Desired as a companion to FSAR update report

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now

   The FSAR update reports document the latest material developed since the FSAR was submitted or last updated. The FSAR is to be revised to include the effects of all NRC approved changes made in the facility or procedures as described in the FSAR, all changes made as a result of safety evaluations performed by the licensees in support of conclusions that changes did not involve unreviewed safety issues, and all changes made as a result of analyses of new safety issues performed at the NRC's request. The changes are reported in the form of revised FSAR pages.

   For the changes that licensee analyses show do not involve unreviewed safety issues, the licensees are required to maintain a record of the safety analyses and their summaries supporting such changes, and are required to submit the summaries to the NRC as required by 10 CFR 50.59(b)(2).

   Frequently it is difficult to decipher a change from FSAR update submittal pages because the changes are documented in different parts of the FSAR. The reports in accordance with 10 CFR (50.59(b)(2) serve a useful purpose of clearly describing the change that caused the FSAR update without prior NRC review and providing a summary of why the change did not involve an unreviewed safety issue. The Project Managers who read the FSAR updates find this information to be very useful for

understanding the safety implications of the changes made to the facilities without prior NRC approval and why NRC should not be concerned.

If, in the process of reading the 10 CFR 50.59(b)(2) reports and the FSAR updates, a Project Manager finds the safety justification of a design change not intuitively obvious, he or she can discuss the concerns with the Headquarters technical staff, visit the site and inspect the licensee's detailed report or ask the Resident Inspector's help to resolve the concerns. Without the benefit of this report the Project Manager, who is the only NRC person handling the FSAR updates, would exercise a less effective safety overview of the activities for which the licensees determine that prior NRC review and approval is not required.

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)

Copies are sent to Project Managers, Regional Offices and Resident Inspectors. A copy of NRC RIDS distribution list is attached (RIDS distribution code for the reports is IE47).

5. Organization(s) using the report

The Project Managers review the reports to determine the adequacy of the licensees' safety analyses supporting the conclusions that prior NRC approvals were not needed. An inspection module was recently approved by NRC to aid the Project Managers in the audits of the licensees' analyses. Resident Inspectors and special inspectors review the reports when their planned inspections have a bearing on the material covered by these reports (e.g., design change inspections).

The 10 CFR 50.59(b)(2) reports also provide NRC useful insights with respect to licensee control of the licensing basis and help assure that the underlying safety interests are adequately maintained by the licensees.

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

Project Managers read the reports to determine if the changes made without prior NRC approval seem reasonable. If any concerns arise, a more detailed audit of the licensee's safety analysis is performed to resolve the safety concerns. Similarly, the Resident Inspectors receive the reports and review them in support of their inspections. Special inspectors for design change inspections review these reports to identify potential inspection areas.

7. Identify routine analyses performed/staff reports generated, based on the report received

   The NRC Project staff prepares overview reports of the review of 10 CFR 50.59(b)(2) submittals. Detailed reports are prepared if the staff identifies concerns which are later confirmed by NRC audits of the licensees' detailed safety analysis reports available at the sites.

8. Estimate the resources (staff hours/contract dollars) expended per report

   NRC resources required to perform the reviews are estimated to be one staff-week per report.

9. Identify similar/related reporting requirements

   Related Report: FSAR update (10 CFR 50.71(e))

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

    The potential safety benefits of the reporting requirement were summarized in item 3 above. The 10 CFR 50.59(b)(2) report is the only easily accessible means NRC has to maintain a safety overview on the licensee activities which are not submitted for prior NRC review and approval. Monitoring the safety analysis reports on a regular basis at sites without knowing what to look for is quite difficult. Only the Resident Inspectors can engage in such an activity. If this requirement were imposed on the Resident Inspectors there would be a significant resource impact on the resident staff. Therefore, eliminating this report would either have an adverse impact on the NRC's mission of maintaining a safety overview on the nuclear power plant facilities or would cause a significant impact on the NRC resources of resident staff.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification

    This report could be coordinated with the FSAR updates. It is not clear how this would reduce any burden on the licensees. Coordination with the FSAR updates would benefit the NRC staff, because all changes to the FSAR pages could be correlated with the summaries of safety analyses which support them. The staff would be able to satisfy itself that the modifications are not likely to involve unreviewed safety issues.

This report could be required to be a brief, but complete, summary of changes, safety justifications and references to FSAR changes not submitted for prior NRC approval. This information will also be useful to the licensees in submitting accurate descriptions of the subsequent changes of the affected systems submitted for NRC review and approval.

12. NRC resource cost or savings based on modifying the reporting requirement

The staff is not proposing any changes which could affect the NRC resources. However, as a result of a recent NRC review of the regulatory requirements and rule changes (57 FR 39353), the frequency of reporting has been changed from annually to each refueling outage. Any savings in the NRC resources will result from those changes only.

13. Management Recommendation(s)

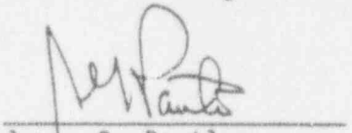
The reporting requirements of 10 CFR 50.59(b)(2) should not be eliminated, because these reports provide NRC with a docketed summary of changes which do not require prior NRC approval. The information is important for maintaining an oversight of the safety of the operating power reactors, helping to assure that the licensing basis of the operating reactors is being maintained and documented, and assuring that the summaries will be available to the public. Therefore, the reporting requirements are important for the NRC mission. However, some guidance on the format of these reports is needed to make these reports more uniformly responsive to the NRC's mission.

To be most useful to NRC for their intended function, these reports should include a brief summary of the design change describing what was done. One-line statements of changes are generally not adequate to meet the objectives of the report. Similarly, elaborate descriptions are not needed and would be counterproductive because they would hamper easy scanning of the records. A sample survey shows that some of the submittals are too brief to serve a useful purpose.

The conclusions in the licensee's safety analysis reports for the design change should be summarized in a manner that would give the reader an appreciation of why the licensee concluded that prior NRC review and approval were not needed.

Although both the FSAR update and the 50.59 changes must be submitted once after each refueling outage, no requirement exists that these be submitted at the same time or correlated. We expect that most licensees would do so if informed of the staff's desire in this regard.

We recommend that the staff interest in the above discussed content and timing of licensee submittals be communicated to licensees by a generic letter requesting actions on a voluntary basis. The Office of the General Counsel and the Committee to Review the Generic Requirements should be consulted to assure that backfit issues are addressed prior to issuing such a letter.

Signature: 

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

CONTACT:
Mohan C. Thadani
PDII-4
504-1476

ANALYSIS OF COMMENTS RECEIVED ON REQUIREMENT THAT THE LICENSEES SUBMIT DESIGN CHANGE REPORTS AFTER REFUELING OUTAGES

COMMENT 1.

NUMARC (Letter From T. Tipton, VP, to NRC, of September 30, 1992)

Commenter states that NRC should review the requirement of annual Design Change Report to determine if the requirement is redundant and should be deleted.

RESPONSE:

The Design Change report serves the purpose of a companion report for the design change pages submitted in the FSAR updates. NRC Project Managers can read the justifications for changes being incorporated in the FSAR without spending inordinate amount of time at the site looking through all the detailed safety analyses not submitted for prior NRC review. If the Project Managers in consultation with the Headquarters technical staff determine that specific licensee conclusions are unclear, they can then visit the site to perform an audit of the detailed analyses and can efficiently resolve their concerns.

Eliminating the reporting requirement of 10 CFR 50.59(b)(2) and requiring Resident Inspectors to review all safety analyses performed by the licensees will saddle the resident staff with substantial additional burden and could divert them from their current safety functions. Also inspection of all safety analyses is not necessary, only the issues that appear to be unclear need to be pursued by NRC. Summaries of licensees safety analyses would provide easier identification of unclear analyses. Therefore, as a minimum, the staff would want the licensees to prepare such summaries and have them available for the Resident Inspectors' use. Such action would not reduce the licensee burden in any significant way. If the Resident Inspectors review the safety analysis summaries at the sites and find any unclear safety analyses, they would probably consult with the Headquarters technical staff on issues of unclear safety analyses. Such consultations will add additional burden on NRC's inspection resources. Therefore, the reporting requirement of 10 CFR 50.59(b)(2) after each refueling outage is consistent with the NRC mission.

NRC will continue to require reports as outlined in the revised 10 CFR 50.59(b), published in the Federal Register Notice of August 31, 1992 (57 FR 39353).

COMMENT 2.

VIRGINIA POWER (Letter from William L.Stewart to NRC, of September 30, 1992)

Commenter states that the issue of the elimination of the Design Change Report be reconsidered for reasons similar to NUMARC comments above.

RESPONSE:

See response to NUMARC comment above.

COMMENT 3.

DUKE POWER (Letter from Hal Tucker to NRC, of September 21, 1992)
Commenter states that for reasons similar to those provided by NUMARC (see above) the requirement of the Design Change Report has outlived its usefulness. The commenter would like the NRC to reconsider the Design Change Report Requirement and let the Resident Inspectors audit the licensees' safety analyses.

RESPONSE:

For the reasons stated in the response to NUMARC comment (see above) the staff believes that the reporting requirement of 10 CFR 50.59(b)(2) is consistent with the mission of NRC.

COMMENT 4.

CONSOLIDATED EDISON COMPANY OF NEW YORK (Letter from Stephen B. Bram to NRC, of September 30, 1992)
Commenter States that for reasons stated in NUMARC comments the requirement of Design Change Report be eliminated. If NRC decides not to eliminate the report, then NRC should consider establishing a threshold of reportability in order to reduce the size of the report.

RESPONSE:

For the reasons stated in the response to NUMARC comment (see above) the staff believes that the reporting requirement of 10 CFR 50.59(b)(2) is consistent with the mission of NRC. The reporting requirement is generally not extensive, because the licensees are required to report only the summaries of those changes that are not submitted for prior NRC review and approval. Establishing a threshold would impose additional burden on the licensees to test each report to a new set of NRC criteria. Reducing the information provided to NRC would defeat the purpose of the report of providing NRC with a safety overview as outlined in response to NUMARC comment (see above).

USER NEED STATEMENT
FOR
NRC POWER REACTOR REPORTING REQUIREMENTS

1. **Identification/statement of reporting requirement**

   10 CFR 70.9, "Completeness and accuracy of information," requires that information provided to the Commission by an applicant for a license or by a licensee or information required by statute or the Commission's regulations, orders, or license conditions to be maintained by the applicant or licensee shall be complete and accurate in all material respects. In addition, each applicant or licensee shall notify the Commission of information identified by the applicant or licensee as having for the regulated activity a significant implication for public health and safety or common defense and security.

2. **Type of report:**

   a. routine report (e.g., facility operational data, test results, FSAR update)

   (i) frequency - When information is identified.

   (ii) timeliness of submittal - No later than 2 days after information is identified.

3. **Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now**

   See #13 Recommendations.

4. **Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)**

   See attached sheet.

5. **Organization(s) using the report**

   N/A

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

N/A

7. Identify routine analyses performed/staff reports generated, based on the report received

N/A

8. Estimate the resources (staff hours/contract dollars) expended per report

N/A

9. Identify similar/related reporting requirements

Section 70.9 includes a provision that states "This requirement is not applicable to information which is already required to be provided to the Commission by other reporting or updating requirements." For Part 50 license applicants or licensees, comparable information is required to be reported under Section 50.9, "Completeness and accuracy of information."

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

N/A

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification

N/A

12. NRC resource cost or savings based on modifying the reporting requirement

To be determined.

13. Management recommendation(s):

In response to the federal register notice soliciting public comments on NRC reporting requirements for power reactor licensees, a recommendation was made that Section 70.9 be revised to include a provision that this regulation does not apply to Part 50 applicants or license holders.

No change is recommended to Section 70.9 since this regulation already includes a provision that this reporting requirement is not applicable to information which is already required to be provided to the Commission by other reporting or updating requirements. (For Part 50 applicants or licensees, comparable reporting requirements are set forth in Section 50.9, "Completeness and accuracy of information.")

Signature: 

Robert F. Burnett, Director
Division of Safeguards and
Transportation, NMSS

Date: JAN 2 8 1993

Contact:
Abe Eiss, SIG/NMSS
504-2187

Joan Higdon, SGTR/NMSS
504-2477

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I	OC/LFMB		01	00
I	REG FILE	01	01	01
X	NRC PDR		01	00

PUBLIC COMMENT TO 10 CFR 70.9, "COMPLETENESS AND ACCURACY OF INFORMATION"

In response to the *Federal Register* notice (57 FR 27394 dated June 19, 1992) soliciting comments on the NRC review of the reporting requirements for power reactor licensees, the only comment received on the subject reporting requirement was in the September 30, 1992 letter from Nuclear Management and Resources Council (NUMARC). The comment was provided in Appendix 2 to Enclosure 1 of NUMARC's letter and states that 10 CFR 70.9(b) is redundant to 10 CFR 50.9(b) and recommend revising 70.9(b) to include a provision stating that this reporting requirement does not apply to 10 CFR Part 50 license holders.

USER NEED STATEMENT
FOR
NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

The subject requirement is 10 CFR 73.71(c)(2), which requires licensees subject to the provisions of §§73.20, 73.37, 73.50, 73.55, 73.60, or 73.67 to submit to the NRC every 3 months one copy of all safeguards event log entries not previously submitted. This user need statement applies only to power reactor licensees who are covered by §73.55.

Event log entries are described in paragraph II of Appendix G to Part 73 as failures, degradations, or discovered vulnerabilities in a safeguards system that could have allowed unauthorized or undetected access to or within a facility or transport had compensatory measures not been established. These entries are also comprised of any other threatened, attempted, or committed acts not defined elsewhere in the rule that have the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness.

Guidance on types of information logged and submittal of that information is provided in Regulatory Guide 5.62, Reporting of Safeguards Events.

2. Type of report:

Routine Report - Safeguards Event Log

(i) frequency - Quarterly

(ii) timeliness of submittal - No later than 30 days following the end of each calendar quarter.

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statements of Consideration), and purpose of the report now

The Statements of Considerations for the amended 10 CFR 73.71 effective October 8, 1987, states that "the reporting of this data to the NRC is necessary...to allow the Commission to identify and characterize generic and facility-specific precursors to certain safeguards events." Improving the ability of the NRC staff to identify generic precursors or defects provides the agency with a capability to initiate corrective action, if needed, prior to a vulnerability having a detrimental effect on the public health and safety. Such information can be utilized to preempt duplicative or similar events in the future. The Statement of Considerations also states that "NRC staff intends to use the reported/recorded safeguards information to assure

that appropriate action is taken by the licensee to address physical security degradation/failure and/or threats against the facility."

Consistent with the originally perceived purpose, the reported data currently is used to:

a. Identify significant declining trends in site-specific performance in order to assess potential causes and effectiveness of corrective actions, if appropriate.

b. Prepare for NRC inspections and monitor plant performance by NRC inspectors.

c. Identify safeguards systems or equipment that may be performing in an unreliable manner at one or more sites.

d. Provide information that can be used to compare a licensee's safeguards system to the remaining industry, especially where similar equipment, procedures, or other characteristics exist.

e. Provide feedback to industry regarding what other licensees have found to cause equipment failure or human error and what means have been implemented to reduce the frequency of repetitive safeguards degradations.

f. Provide input to NUREG-0525, "Safeguards Summary Event List."

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)

See Attachment A.

5. Organization(s) using the report

Office of Nuclear Reactor Regulation (NRR)
Office of Nuclear Material Safety and Safeguards (NMSS)
Regional offices (NRC safeguards inspectors)

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

The safeguards event reporting program has contributed to improved equipment reliability and reduced frequency and duration of compensatory measures and events. The event reporting program has also provided the NRC with the capability to monitor personnel performance, evaluate new technology, and share with licensees throughout the industry information related to successful security systems and programs that could be applied to other facilities.

NRC safeguards inspection staff uses the event data and subsequent analysis to identify site-specific equipment failure and human error, improper use of compensatory measures (e.g., use of compensatory measures instead of solving the fundamental problem) and declining trends in facility performance. This information supports inspection planning and preparation. In some cases, the log information has identified concerns sufficient to initiate reactive inspections. NRR staff have used event data and subsequent analysis information in support of staff assessment of policy considerations. Certain entries in the logs are also used to update the NRC's historical record of safeguards events (NUREG-0525).

7. Identify routine analyses performed/staff reports generated, based on the report received

NMSS receives event logs forwarded quarterly by the licensees and enters data from the logs into a computer program which generates quarterly statistical reports. The program classifies events and provides site-specific and nationwide statistical data, which includes trending data. Selected detailed event information provided by licensees is also documented in the quarterly report generated by NMSS for review by NRC and licensees. The quarterly report is distributed to all safeguards inspectors and all reporting licensees. NUREG-0525, "Safeguards Summary Event List," published annually by NMSS.

8. Estimate the resources (staff hours/contract dollars) expended per report

One FTE expended annually by NMSS for event data analysis and the report's preparation and dissemination four times a year. No contract dollars are expended.

9. Identify similar/related reporting requirements

10 CFR 73.71 also requires prompt reporting of more significant safeguards events to the NRC Operations Center. (These events are not duplicates of events recorded in quarterly event logs.) 10 CFR 73.71 includes a provision that duplicate reports are not required for events that are also reportable in accordance with §§ 50.72 and 50.73 of this chapter.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

If the logged security events were not recorded and forwarded to the NRC, a data base would not be available to the Commission to perform security event analysis. Elimination of this data base would lessen the ability of the NRC, as well as licensees, to assess site-specific and generic trends concerning safeguards equipment performance.

Without the event data and analysis information, safeguards inspectors would be more limited in means available to them to assess the performance of site-

specific safeguards systems in the periods between inspections. However, this function could be accomplished by the inspector onsite.

Prior to the revision to 10 CFR Part 73.71(c)(2) in 1987, security events were required to be logged, but the logs were not required to be submitted to the NRC. Since these reporting requirements were established in 1987, reports of degradations have decreased by 24 percent, thus indicating improvement in safeguards systems reliability and the protection of public health and safety due to more thorough analysis of reported events by licensees and the NRC. If logs were not required to be submitted, emphasis would still need to be placed on the importance of each licensee logging, tracking, and trending loggable events. Unless an exchange of loggable data was initiated between licensees to take the place of the NRC log analyses, individual licensees would not be able to compare the reliability performance of their safeguards systems against industry averages.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification

The Commission has already taken several actions to reduce the event reporting burden on licensees. In March 1991, the Commission issued Generic Letter 91-03 entitled "Reporting of Safeguards Events" (GL 91-03), which provided relief from prompt reporting of certain events and clarified that some events did not need to be reported promptly or logged. As a result of this generic letter, prompt reporting to the Operations Center was reduced and some unnecessary logging was eliminated by those licensees choosing to implement the guidance.

Although (as discussed in items 6 and 10, above) the submittal of loggable events does provide benefits, these benefits are marginal, compared to the burden, and in some cases alternative approaches can be used to obtain the same benefit. Also, elimination of emphasis on coding and preparation of logs for submittal to the NRC may free resources for greater licensee attention to monitoring and tracking of the events and greater interaction between licensees.

12. NRC resource cost or savings based on modifying the reporting requirement

If the requirement to submit logged security events were eliminated, some savings related to NRC collection and analysis of data would occur.

13. Management recommendation(s)

Logged security events provide useful information for trending and monitoring security system performance. However, this benefit is of principal use to each licensee for monitoring events at their particular site. NRC's collection, analysis and periodic reporting of the data submitted to the NRC by licensees does provide useful generic analysis and useful feedback to

licensees. However, industry comments that uses of this analysis are limited and the resource cost for packaging loggable events for submittal to the NRC may not be resource effective have merit. A number of the events now required to be logged are of minor significance. Exchange of information between licensees on safeguards performance is an activity that the industry could assume responsibility for performing.

The staff believes that continuing the requirements for power reactor licensees to record security event information is appropriate. However, the staff agrees that public health and safety would not be compromised if the logs were no longer submitted to the NRC.

Signature: Frank J Congel

Frank J. Congel, Director
Division of Radiation Safety
and Safeguards, NRR

Date:

Contact:
Nancy Ervin, DRSS/NRR
504-2477

Attachment:
A. RIDS Distribution Code for
NMSS Safeguards Event Report

ATTACHMENT A

11/18/82 PAGE 395

NUCLEAR REGULATORY COMMISSION
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DISTRIBUTION CODE: S001 Security Plans

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I	OC/LFMB		01	00
I	REG FILE	01	01	01
R	NRC PDR		01	00

SUMMARY OF COMMENTS AND RESOLUTIONS FOR TEST CASE REPORTING REQUIREMENT

10 CFR 73.71(C)(2)

COMMENTS:

NUMARC commented that power reactor licensees should be deleted from the list of licensees subject to the provisions of 10 CFR 73.71(c), which address safeguards event log requirements. NUMARC recommended that, in lieu of logging requirements, power reactor licensees be subject to a separate requirement under 73.71 wherein they would be required to establish measures to assure that certain safeguards events are promptly identified and corrected. NUMARC commented that comparisons among plants of the data provided in the logs is not meaningful because the number of events reported by each site is dramatically influenced by a number of site-specific variables such as the number and design of system components and unique physical arrangement. They commented that comments received from industry were almost unanimous in advising that licensees receive insignificant information from the NRC's quarterly "Safeguards Events Analysis Report." NUMARC further commented that the real benefit in recording safeguards events lies in its usefulness as a management tool to measure a plant's specific performance, independent of other facilities. NUMARC recommended that, instead of the current requirements, the regulations be revised to require each power reactor licensee to track and trend the site's performance against licensee-established benchmarks that are based on the site-specific operating circumstances. NUMARC proposed specific "Guidelines" for types of events that would be required to be recorded. The guidelines NUMARC proposed did not address a number of the events that licensees are currently required to record, including vital area barrier degradation, vital area alarms, vital area alarm response and access control in vital areas. Several licensees' comments endorsed NUMARC's proposal.

One licensee commented that, if the requirement to submit a log to the NRC was not deleted, the frequency of submittal should be reduced from four times each year to the same frequency as that required for submittal of fitness-for-duty performance data [10 CFR 26.71(d)]. The licensee noted that timeliness would not be adversely impacted in a significant way by annual or semiannual rather than quarterly reporting. The licensee also suggested that evaluation of trends is more meaningful when based on events over 6 months or a year rather than only 3 months.

RESOLUTION:

The staff agrees with the comments that a primary benefit in logging events is the usefulness of the log as a means to track and trend the performance of the safeguards systems for that plant. While the submittal to the NRC of these logs does provide some benefit with respect to generic event analysis, the staff does not

consider this function significant. Resources used to prepare loggable events for submittal to the NRC may be better spent on other activities. Therefore, while the staff continues to support the logging of events, the staff recommends that the requirement for their submittal be deleted.

Contact:
Nancy Ervin, DRSS/NRR
504-2946

TEST CASE 5

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

   10 CFR 50.74 — The facility licensee will notify the NRC within 30 days for the following regarding operator licenses issued under 10 CFR part 55: (a) permanent reassignment to non-licensed duties, (b) termination of the operator licensee, or (c) disability or illness as described in 10 CFR 55.25.

2. Type of report: Special Report

   (i) Timeliness of submittal: 30-day grace period provided.

   (ii) Annual average number of reports: Approximately 160

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now:

   The original purpose of the report was to notify the NRC of a change in the status of an operator's license due to reassignment, termination, or disability (as described in 10 CFR 50.74). The intent is to report to the NRC permanent or potentially permanent changes to the condition of operator licenses.

   There has been no change in the purpose or the safety objective of this report since its inception.

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients) -

   10 CFR 50.74:

ACRS	NRR/DRCH/HHFB	NRR/DRCH/HOLB	REGION FILE
AEOD/DOA	NRC PDR	NSIC	

5. Organization(s) using the report:

   Operator Licensing Branch, DRCH, NRR
   Human Factors Assessment Branch, DRCH, NRR
   Division of Operational Assessment, AEOD
   Regional Administrators

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report:

   The regional operator licensing branch uses information from the notifications under 10 CFR 50.74 to consider the need to condition or terminate operator licenses. Other organizations in NRR and AEOD use the report for information to determine program or policy changes.

7. Identify routine analyses performed/staff reports generated, based on the report received:

   There are no routine analyses performed or staff reports generated as a result of these notifications. However, licensing action may be taken on the individual Part 55 licensee based on the information in the report.

8. Estimate the resources (staff hours/contract dollars) expended per report:

   Approximately 8 staff hours per report.

9. Identify similar/related reporting requirements:

10 CFR 55.25	Facility licensee will notify the NRC within 30 days of learning that an operator licensee has developed a physical or mental condition that causes the licensee to fail to meet the requirements of 10 CFR part 55.21.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users):

    This information is required to maintain a current and accurate record of each Part 55 licensed operator's medical condition. Therefore, elimination of this reporting requirement is not a viable alternative.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time

continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification.

Proposed: Notifications required under 10 CFR Part 50.74(c) and 55.25 should be consolidated into a single notification under 10 CFR 50.74. The facility licensee would no longer be required to report operator incapacitation due to disability or illness under 10 CFR part 55.25, rather, 10 CFR 55.25 would refer to 10 CFR 50.74(c) to make this reporting requirement.

Justification: The notification required by 10 CFR 55.25 is also required by 10 CFR 50.74(c). Facility licensees must currently reference both 10 CFR 50.74(c) and 10 CFR 55.25 when making notifications under this part. Eliminating the redundant reporting requirement would eliminate duplication of regulatory notification requirements.

The change in reporting requirements would not involve a reduction in the number of notifications by the facility licensee, only in the parts of the regulation being referenced. The safety objective of the original reporting requirements would continue to be met.

The changes described above by themselves do not justify the resource expenditures associated with a change to the regulations. However, a license amendment to the reporting requirements in 10 CFR Part 50 and Part 55 should be considered if it can be done as part of a larger overall regulatory effort to reduce duplicative reporting requirements.

12. NRC resource cost or savings based on modifying the reporting requirement:

It is estimated that modifying the reporting requirements would not result in a significant resource or cost savings. The change in reporting requirements would not involve a reduction in the number of notifications by the facility licensee, only in the parts of the regulation being referenced.

13. Management recommendation(s)

The current reporting requirements are not a significant burden to either reactor licensees or the NRC. Therefore, the resource impact of a rulemaking for the purpose of consolidating the notification requirements referenced herein should only be considered if it can be done as part of a larger overall regulatory effort to reduce duplicative reporting requirements.

Cecil O. Thomas
for Bruce A. Boger Date: 1/6/93
Lead Division Director

Division/Office: DRCH/NRR

Analysis of Public Comments:

Only two comments were made concerning the reporting requirements for operator licenses. These commentors did not suggest the elimination of any reporting requirement, rather, they suggested that the redundant requirements of 10 CFR Part 55 be consolidated in 10 CFR Part 50.74. Because there would not be a significant impact on public health and safety, and due to the high resource costs associated with rulemaking, it is recommended that this amendment be considered only if it can be done as part of a larger overall regulatory effort to reduce duplicative reporting requirements.

USER NEED STATEMENT FOR NRC POWER REACTOR REPORTING REQUIREMENTS

TEST CASE 6

1. *Identification/statement of reporting requirements:*

   10 CFR 50, Appendix I, IV.A.3: Reporting of releases to unrestricted areas which, during any calendar quarter, exceed one-half the annual design objective doses .

2. *Type of report:*

   Special written report within 30 days of calendar quarter when release(s) occurred. Less than one report per year per nuclear power plant site.

3. *Purpose of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now*

   The purpose of the report is unchanged from its original intent, that is, to monitor the effectiveness of the licensee's program to maintain radioactive effluent releases as low as reasonably achievable (ALARA).

4. *Organizations receiving the report (list RIDS distribution code identifiers/recipients)*

   Regions, NRR/PDs, NRR/PRPB

5. *Organizations using the report*

   Regions and NRR/PRPB

6. *Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report*

   These reports occur very infrequently, on the order of one (or less) reports per year. The reports indicate that the licensee has been unable to maintain effluent releases ALARA based on having exceeded design objective dose objectives for members of the public; they inform the NRC of the licensee's proposed corrective actions to restore effluent releases to an ALARA condition. NRC would review the report and verify by discussion or onsite inspection that the licensee has taken the appropriate corrective actions.

7. *Identify routine analyses performed/staff reports generated, based on the report received*

   NRR and Regional staff examine such reports to determine the specific cause of the design objective dose being exceeded, i.e., whether single or multiple environmental media were involved, multiple vs. single radionuclides, etc. If other than a single nuclide/single pathway is

involved, NRR or the Regions would perform independent dose assessments using the relatively recently acquired PCDOSE computer code to further investigate the licensee's report. An NRC report may be issued based on the significance of the release and a Region-generated inspection report issued if follow up at the reactor site was required.

8. *Estimate the resources (staff hours/contract dollars) expended per report*

Modest staff resources are needed - about 2-3 hours divided between HQ and the region for most reports. For a recurring event, some contractor review may be needed but would unlikely exceed 40 hours.

9. *Identify similar/related reporting requirements*

Technical Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3 specifically implement the Guides for Tech Spec Limiting Conditions for Operation which are contained in 10 CFR Part 50, Appendix I, Section IV. These Tech Specs are necessary because Section IV of Appendix I does not constitute a regulatory reporting requirement by itself. Similar effluent release reporting requirements are contained in 10 CFR Part 20 and 10 CFR Part 50 (§§50.72, 50.73); however, the thresholds for these requirements are higher than Appendix I. Furthermore, the Part 20 and 50 reporting requirements only address concentrations in effluents. Therefore, a significant radionuclide buildup in an environmental pathway would not be reportable under Parts 20 and 50; Appendix I would require a report because it is expressed in terms of environmental pathway doses.

10. *Discuss the potential reduction in public health and safety that would result if the reporting was eliminated (provide differing views of other users).*

NRC would lose the capability for early alerts to potentially significant effluent management problems and plant operation in the non-ALARA arena by having releases that may exceed the design objective doses for members of the public.

Having Appendix I and its associated reporting requirements in place allowed the NRC to recently convince the EPA that more stringent effluent limitations, which were to be imposed by the EPA pursuant to the Clean Air Act 1990 Amendments on all NRC licensees (including nuclear power plants), were not necessary. In response to the NRC arguments, the EPA conducted a recision rulemaking to remove power reactor requirements from the proposed Subpart I to 40 CFR 61.

NUMARC has recommended the deletion of these reports based on the perception that other regulatory requirements cover the Appendix I reporting requirements. For reasons stated in Paragraph 11, the Staff disagrees with NUMARC's recommendation.

11. *Discuss and justify proposed modifications to the reporting requirement that could reduce licensee impact while at the same time continue to meet the safety objective*

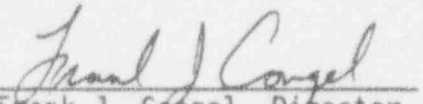
Since the reporting requirement in Appendix I (as implemented via Tech Specs) results in such infrequent reports (many licensees may never need to report), the burden is already extremely low so that modification seems unwarranted. NUMARC has recommended modifying (or perhaps deleting) the TS reports cited under 3.11.1.2, 3.11.2.2, and 3.11.2.3. NRR Staff disagrees with this recommendation because these reports alert the NRC to problems at a reactor facility. Unlike similar Part 20 and 50 reporting requirements, the Appendix I reporting requirements are the principal means (and perhaps the only direct means) of alerting the NRC to potential safety problems resulting from unexpected buildup of radionuclides in an environmental exposure pathway. In addition, these TS sections are the means by which the NRC implements the requirements of Section IV of Appendix I.

12. *NRC resource cost or savings based on modifying the reporting requirement.*

The cost savings would be minimal because the current cost to NRC is low.

13. *Recommendation(s):*

Do not change Appendix I or the implementing Tech Spec reporting requirements because they are the principal means by which NRC may learn on a timely basis of effluent management problems being experienced by licensees and possible long-term environmental impacts associated with the releases.

Signature: 

Frank J. Congel, Director
Division of Radiation Safety
and Safeguards
Office of Nuclear Reactor Regulation

Date:

Contact:

Thomas Essig, NRR/PRPB
504-1068

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

   Testing and reporting requirements for containment leakage testing are specified in 10 CFR 50 Appendix J. The preoperational and periodic Type A tests are the subject of a summary technical report submitted to the Commission. The testing requirements are specified within the regulation as one of the license conditions for all water-cooled power reactors. The containment leakage tests are necessary because they provide for preoperational and periodic verification of the leak-tight integrity of the primary reactor containment and systems/components which penetrate the containment of water-cooled power reactors.

2. Type of report: The Type A test report is considered a routine report.

   (i) Frequency: The reporting frequency is about once every 3 1/2 years.

   (ii) Timeliness of submittal: The report is submitted about 3 months after conducting the test.

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now

   The test report originally provide the staff with the licensee evaluation of the containment leak rate test. The report demonstrated that the containment met all leakage criteria specified in the Technical Specifications.

   Failure to meet the test criteria specified in the Technical Specifications would be documented in an additional report which would accompany the test report. This additional report would include the analysis and interpretation of the test data, the least squares fit analysis of the test data, the instrumentation error analysis, and the structural conditions of the containment or components which contributed to the failure. The staff

believes that the reporting of a test failure is not in question and will continue to be done by licensees.

At the present time, the headquarters staff does not review these reports. The review of these reports is the responsibility of the region within which the plant is located. The level of review will vary from one report to another and between the regions; however, all regions review the test reports on an audit basis. The purpose of the review is to assure that the licensee has properly determined the leak rate of the containment and that it meets all leakage criteria.

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)

   Reports are sent to the Document Control Desk, and the distribution code of A017D. In addition, copies are sent to the cognizant NRC Regional Office and Resident Inspector(s).

5. Organization(s) using the report

   The cognizant NRC Regional Office.

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

   Generally, the reports receive only an audit review. This applies to reports which the licensee has concluded that a sucessful test was performed. Failed tests, however, are evaluated more closely. An example of this is the reported failure of a containment bellows at a boiling water reactor plant, which prompted the staff to issue an Information Notice to the industry.

7. Identify routine analyses performed/staff reports generated, based on the report received

   At the present time, the regions do not include the evaluation of the containment leak rate test reports as a core activity. As a result, only audit reviews are performed by the resident/regional inspectors. A major activity of the audit review is to perform confirmatory calculations using a microcomputer.

8. Estimate the resources (staff hours/contract dollars) expended per report

   A rough estimate would be several days of effort for each audit review.

9. Identify similar/related reporting requirements

   There are no similar test reports; the report consists of test data and an evaluation of the data. Nevertheless, test failures are reportable under 10 CFR 50.72 and 10 CFR 50.73.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

    It is our belief that the elimination of test reports associated with a successful containment integrated leak rate test (CILRT) would have minimal impact on the overall health and safety of the public. CILRTs have been performed and evaluated by the nuclear power industry enough times that any misinterpertation of testing requirements is highly unlikely.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification

    Our recommendation would be to eliminate the reporting requirements for all Type A tests and their associated Type B and C tests. Having these reports only at the respective plant sites should be sufficient for normal record keeping. Reports of this type are not normally reviewed in depth and are only used to obtain prior testing history when a failure occurs.

    For the case of a failed test, the reporting requirements of 10 CFR 50.72 and 10 CFR 50.73 are a sufficient replacement to the reporting requirements of Appendix J to 10 CFR 50. The licensee would still be required to report the failed test, but not in the same level of detail prescribed in Appendix J. Nevertheless, NRC staff would have access to all leak rate test reports required by Appendix J that now would be maintained at the plant site.

12. NRC resource cost or savings based on modifying the reporting requirement

The savings would be minimal since staff use of the reports is at a relatively low level.

13. Management recommendation(s)

Licensee submittal of all containment leak rate test reports should be eliminated. Test failures will continue to be reported through 10 CFR 50.72 and 10 CFR 50.73, and the test reports currently prescribed by Appendix J would be available for NRC staff review at the plant sites.

J M Holahan Date: 4/16/93
Lead Division Director

Division/Office: DSSA/NRR

TEST CASE 8

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement

   TS 4.4.5.5 (a): Summary report of number of steam generator (SG) tubes plugged or repaired

   TS 4.4.5.5 (b): Results of SG tubing inservice inspection

   TS 4.4.5.5 (c): Special report of results of SG tube inspection that falls in Category C-3

   TS 4.4.5.5 (d): Results of SG inspection for which alternate tube plugging criteria was used (this requirement only applies to plants which have implemented the voltage-based interim plugging criteria for one cycle of operation)

   TS 4.4.5.5 (d): Identification of F* and L* tubes including the location and the size of the degradation (this requirement only applies to plants which have implemented either the F* and/or L* criteria)

2. Type of report:

   a. routine report(s)

      (i) frequency

         TS 4.4.5.5 (a): every outage and after each inservice inspection

         TS 4.4.5.5 (b): after each inservice inspection

         TS 4.4.5.5 (d): prior to restart for both the voltage-based plugging limit report and the F* and L* report

(ii) timeliness of submittal

TS 4.4.5.5 (a): within 15 days

TS 4.4.5.5 (b): within 12 months

TS 4.4.5.5 (d): prior to restart for both the voltage-based plugging limit report and the F* and L* report

b. operational event report(s)

(i) timeliness of submittal

TS 4.4.5.5 (c): Via 50.72 (b)(2) within 4 hours, followed by a written report within 30 days (but before start-up)

(ii) annual average number of reports

TS 4.4.5.5 (c): Approximately 10 to 15 reports per year

3. Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now

TS 4.4.5.5 (a), (b), (c), and (d): The SG tubing inservice inspection reports were originally intended to monitor the general condition of the SG tubing, monitor the adequacy of SG inspections and repairs, and screen for potential generic issues. The SG tubing inservice inspection reports are presently used for these purposes. The reports assure the integrity of the SG tubing by allowing review of the examinations performed, conditions observed, and corrective measures taken.

4. Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)

TS 4.4.5.5 (a), (b), (c), and (d):

RIDS Code: A047

LICENSING ASSISTANT	PROJECT DIRECTORATE
PROJECT MANAGER	ACRS
NRR/DE/EMCB	NRR/DE/EMEB
OC/LFMB	REG FILE
RES/DSIR/EIB	NUDOCS-ABSTRACT
OGC/HDS2	RES MILLMAN, G
EG&G BROWN,B	EG&G RANSOME, C
NRC PDR	NSIC

5. Organization(s) using the report

   TS 4.4.5.5 (a), (b), (c), and (d):

   NRR/DE/EMCB
   Regions I, II, III, IV, and V

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

   TS 4.4.5.5 (c): Plant Specific - After notification that a SG has been categorized C-3, the Materials and Chemical Engineering Branch will discuss the inspection results with the licensee via phone calls and/or meetings. The discussions with the licensee are to ensure that the corrective actions taken by the licensee are appropriate/adequate and that no immediate regulatory response is required.

   TS 4.4.5.5 (a), (b), (c), and (d): Generic - The data supplied in the SG inservice inspection reports is used to assess the operational events and degradation mechanisms affecting pressurized water reactor steam generator tube integrity. The reports also allow identification of prevalent problem areas and improvements that have been made in nondestructive testing methods, preventive measures, and repair techniques. The data is used in the development of Information Notices, Bulletins and/or Generic Letters on inservice inspections, sample expansions, and repair methods.

7. Identify routine analyses performed/staff reports generated, based on the report received

   TS 4.4.5.5 (c): The staff assesses the circumstances of the C-3 results to ascertain whether follow-up regulatory action of either a generic or plant specific nature is warranted. The staff may issue Safety Evaluation Reports (SERs) or generic communications in response to these occurrences.

   TS 4.4.5.5 (a), (b), (c), and (d): A summary report is issued approximately every two years summarizing the information provided in the SG inservice inspection reports. For example, NUREG/CR-5796, Steam Generator Operating Experience, Update for 1989-1990, L. Frank, Viking Systems International. Information from the SG inservice inspection reports is currently being used to develop a computerized SG database. Additionally, the 15 day report provides the staff with an early indication of any extensive steam generator tube degradation at a plant.

8. Estimate the resources (staff hours/contract dollars) expended per report

   TS 4.4.5.5 (c): Typically one person-week for staff follow-up activities is expended following each instance of Category C-3 results. In addition there are approximately up to three SERs and up to three generic communications prepared per year as a result of category C-3 findings within a SG which typically requires two to four person-weeks of effort.

   TS 4.4.5.5 (a), (b), (c), and (d): The amount of time to review a SG inservice inspection report and update the SG database varies from submittal to submittal. Typically, one to four hours per plant is required by the staff to review the inspection reports and update the database. To prepare the SG operational experience update reports requires several person-weeks and approximately $30,000 in technical assistance funds.

9. Identify similar/related reporting requirements

   Inservice Inspection (ISI) reports are submitted within 90 days of the completion of each refueling outage and are substantially more detailed than the steam generator inspection results report. The SG inspection results report is not required to be submitted until 12 months following the completion of the inspection. Inclusion of the SG data required by TS 4.4.5.5 (b) with the ISI report would be more time restrictive on the licensee. Several utilities have submitted the 12 month SG inspection results report with the ISI report; however, this is currently not a requirement.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)

    TS 4.4.5.5 (c) requires prompt notification of Category C-3 findings in a SG. Such notification is essential in ensuring that plant specific actions are adequate to ensure the integrity of the SGs for the next operating cycle. In addition, prompt notification ensures that if immediate generic action is warranted due to the findings of the inspection, appropriate action can be taken in a timely fashion.

TS 4.4.5.5 (a), (b), (c), and (d) reporting requirements provide the NRC with the capability to maintain a SG database and, in addition, to trend industry performance. The database allows the identification of potential safety significant events/trends that may warrant generic communications. The 15-day report provides the staff with an early notification of any significant degradation observed at a plant. SG inservice inspection reports from plants that have not identified any test failures may: 1) indicate that the inservice inspection program is not effective in detecting certain forms of degradation, and/or 2) allow identification of effective corrective measures implemented by a specific plant for improving SG tube integrity.

11. Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification

    The information reported as a result of TS 4.4.5.5 (a) and TS 4.4.5.5 (b) should be standardized. The use of an electronic form could simplify and streamline the reporting requirements and would allow easier integration into the SG database. The information reported is necessary in order to monitor industry trends and provide the staff with an early indication of extensive SG tube degradation.

    The information reported as a result of TS 4.4.5.5 (c) is used by NRR to ensure that SG tube integrity is maintained under normal, transient, and accident operating conditions over the next cycle and should be retained.

    The information reported as a result of TS 4.4.5.5 (d) for voltage-based alternate plugging criteria only affects the plants that have implemented this type of plugging criteria for one cycle of operation. This information is used by NRR to ensure that the structural and leakage integrity of the SG will be maintained over the cycle and to monitor for trends in the data; therefore, it should be retained.

    The information reported as a result of TS 4.4.5.5 (d) for plants that have implemented the F* and L* plugging criteria could be deferred to the 12 month report provided the regions concur on this recommendation. The information provided in this report is necessary for the reasons cited in Items 6, 7, and 10 above.

12. NRC resource cost or savings based on modifying the reporting requirement

A standardized report (i.e., a uniform format) would allow a more rapid review of the submitted material by the NRC. TS 4.4.5.5 (b) submittals vary in length from several pages to hundreds of pages.

13. Management recommendation(s)

Evaluate the need for more specific guidance on the information to be reported by the licensee in these reports. Evaluate the benefit of receiving the information electronically.

James B. Richardson, Director
Division of Engineering
Office of Nuclear Reactor Regulation

NRC STAFF ASSESSMENT OF THE RELEVANCY OF REPORTING REQUIREMENTS FOR POWER REACTOR LICENSEES

PUBLIC COMMENTS - TECHNICAL SPECIFICATION (TS) 4.4.5.5

Of the 15 letters of comments, three commented directly on technical specification (TS) 4.4.5.5 and seven endorsed the NUMARC comments on TS 4.4.5.5. NUMARC believes that the summary reports of steam generator (SG) tubes plugged, results of SG tube inservice inspections, special reports of the results of SG tube inspections that fall in Category C-3, and results of SG inspections for which alternate tube plugging criteria were used could all be included in SG test program requirements, and be deleted from current TSs (pg 2 of Enclosure 3). South Carolina Electric & Gas Company believes the 15 day report on the number of SG tubes plugged can be deleted and that the results of the inspections of F* and L* tubes should be deferred to the 12 month report (Item 4 in letter dated September 29, 1992). Duke Power Company believes that reports on SG tests and inspections should be reported only if a test fails or unexpected findings occur during the test ("Results of Preplanned Testing and/or Surveillance" in letter dated September 21, 1992).

Incorporation of the SG tube reports required by the current TSs into the requirements contained in a SG tube inspection program would be considered appropriate provided that the NRC has review and approval authority over such a program. The NRC is currently working with the industry to address this issue as part of the Technical Specification Improvement Program. The 15 day report on the number of tubes plugged provides the staff with an early indication of any extensive SG tube degradation that a plant may be experiencing. The results of the inspection of the F* and L* tubes (required by TS 4.4.5.5 (d)) could be deferred to the 12 month report provided the regions concur on this recommendation. Special reports of the results of SG tube inspections that fall in Category C-3 and results of SG inspections for which alternate tube plugging criteria were used are important for monitoring SG tube degradation, and therefore should not be deleted. Reporting results of failed SG tube tests is essentially what is being accomplished by the reports required under TS 4.4.5.5 (a), (b), and (c). Furthermore, identification of plants that have identified no test failures may: 1) indicate that the inservice inspection program is not effective in detecting certain forms of degradation, and/or 2) allow identification of effective corrective measures implemented by a specific plant for improving SG tube integrity. The requirements under TS 4.4.5.5 (d) for voltage-based alternate plugging criteria are required to ensure that the structural and leakage integrity of the SG can be maintained throughout the operating cycle.

TEST CASE 9

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/statement of reporting requirement.

   TS 6.9.1.3 - Cycle Startup Report

   The new Standard Technical Specifications (STS), Revision 0, dated September 28, 1992, state in Section 5.9, Reporting Requirements, under TS 5.9.1.1, Startup Report, that a summary report of plant startup and power escalation testing shall be submitted following:

   a. Receipt of an Operating License;

   b. Amendment to the license involving a planned increase in power level;

   c. Installation of fuel that has a different design or has been manufactured by a different fuel supplier: and

   d. Modifications that have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

2. Type of report

   a. routine report

      (i) frequency
      Following plant startup if one of the conditions prescribed in Item 1 is met.

      (ii) timeliness of submittal

      Startup Reports shall be submitted: within 90 days following the completion of the Startup Test Program; within 90 days following resumption or commencement of commercial power operation; or within 9 months following initial criticality, whichever is earliest.

3. Purpose (safety objective) of the report as originally perceived(e.g. see Statement of Consideration), and purpose of the report now.

To document the comparison of measured and predicted physics parameters of the core. To determine the criteria by which tests should be judged. Presently the report data is used to update the Database of Startup Test Data. This database is used to determine criteria (these change as calculational methods change), to judge whether the core is as predicted and to determine if physics parameters are as predicted with a precision that is reasonably achievable.

4. Organization(s) receiving the report (list of RIDS distribution code identifiers/recipients.

Reports are sent to the Document Control Desk with a distribution code of IE26D.

5. Organization(s) using the report

NRR/DSSA/SRXB - Margaret Chatterton

6. Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report

Generally the reports receive only an audit review and the data is entered into the database. If the test (review or acceptance) criteria are not met or if the data is different from the ordinary, the deviation is investigated. These investigations have led to improvements in the calculational process for predicting power distributions and other physics parameters. They have also been the means by which the effects of small cycle to cycle differences have been discovered.

7. Identify routine analyses performed/staff reports generated, based on the report received

Routine analyses consists of evaluation of the report and entering the data into the database.

8. Estimate the resources (staff hours/contract dollars) expended per report

Most reports require about 1-2 hours for analysis and data entry.

9. Identify similar/related reporting requirements

There are no similar test reports.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated(provide differing views of other users)

Elimination of the reports would probably have minimal impact on the overall health and safety of the public. While in the past, review of these reports has led to improvements in the calculational process for physics parameters, it is difficult to correlate this with overall public health and safety.

11. Discuss and justify proposed modifications to the reporting requirements(may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of the other users; conversely, justify retaining the reporting requirement, without modification

Our recommendation would be to reduce the report to a simple 2-3 page format providing only the predicted and measured values for the following: Hot Zero Power (HZP) Critical Boron Concentration All Rods Out (ARO), HZP Critical Boron Concentration with Rods Inserted, Control Rod Worths, Isothermal Temperature Coefficient, Power Distributions and Full Power Critical Boron Concentration. This would provide the needed information while easing the reporting requirements.

12. NRC resource cost or savings based on modifying the reporting requirement

Savings would be minimal.

13. Management recommendation(s)

See section 11

A. Thadani Date: 3/30/93

Lead Division Director

Division/Office: DSSA/NRR

USER NEED STATEMENT

FOR

NRC POWER REACTOR REPORTING REQUIREMENTS

1. *Identification/statement of reporting requirement*

   Annual Occupational Radiation Exposure Report, for personnel receiving exposures ≥ 100 mrem/yr, broken down by work and job function, tabulated by job classification. This report format is described in TS 6.9.1.5.

2. *Type of report:*

   Routine report submitted by each LWR facility on an annual basis. Report submitted within the first quarter of each calendar year.

3. *Purpose (safety objective) of the report as originally perceived (e.g., see Statement of Consideration), and purpose of the report now*

   The purpose of the report is unchanged from its original intent, that is, to provide the NRC with a tabulation of the number of station, utility, and other personnel receiving exposures greater than 100 mrem/yr and their associated man-rem exposures according to work and job functions.

4. *Organization(s) receiving the report (list RIDS distribution code identifiers/recipients)*

   Regions, NRR/PDs and PRPB, RES, and NMSS

5. *Organization(s) using the report*

   NRR/PRPB and RES

6. *Plant-specific/generic actions taken upon receiving the report; discuss specific contributions to safety (relative to NRC mission) that result from reviewing and acting on the report*

The dose breakdown information contained in these reports is not included in any other NRC required report. These reports provide the NRC with an effective tool to evaluate the progress being made by the individual utilities and the utilities as a whole in reducing doses in various job and dose function categories. The staff has been receiving these reports for the past fifteen years and has been able to trend how dose distributions by work and job function have changed over these years. The staff can compare the overall plant average dose distribution by work function with the dose distribution for a single plant to detect any anomalies in an individual plant's dose distribution pattern. Two of the work function categories included in these dose breakdown reports are routine maintenance and special maintenance. Special maintenance includes all non-routine and unplanned maintenance work, including work required as a result of special NRC directives (e.g., TMI action plan requirements). Immediately following the accident at Three Mile Island, there was an overall increase in LWR doses. This was due, in large part, to the increase in special maintenance work necessitated by the TMI action plan requirements. As LWRs gradually completed implementation of the TMI mandated fixes, the percentage of special maintenance work, as well as overall LWR doses, decreased. The staff has been able to use the data from the dose breakdown reports to study the shift in dose distribution from special maintenance to routine maintenance over the last several years.

7. *Identify routine analyses performed/staff reports generated, based on the report received*

The work and job function dose distributions for each individual LWR are included as part of the NRC's annual dose analysis NUREG document entitled, "Occupational Radiation Exposure at Commercial Nuclear Power Reactors and Other Facilities" (NUREG-0713). This NUREG also contains tables showing overall LWR dose distributions by occupation and personnel type, as well as tables showing how the occupational dose distributions at LWRs have fluctuated over the years. All of this information is derived from the data contained in these work and job function dose distribution reports.

The licensee's submittal of plant doses broken down by work and job function provides the NRC with another layer of detail that the agency can use to study trends in plant doses. As stated in item 6 above, the staff has used the occupational dose distribution information to correlate the shift in doses between special and routine maintenance with the overall decrease in LWR doses over the past several years. The staff has also been able to correlate the recent drop in LWR doses with

the personnel distribution tables submitted to the NRC as part of the subject reporting requirements. As the LWR doses have decreased, the staff has noticed that a larger percentage of the plant maintenance work is being performed by station and utility personnel as opposed to contract personnel. Since station personnel are more familiar with the plant layout and components, in many cases they can perform the same maintenance work and get lower doses than contractor personnel. Finally, the job and work function dose tables provide a more detailed breakdown of individual plant dose than do the dose tables required by 10 CFR 20.407. Since Millstone submits only a single 10 CFR 20.407 dose table for its three units (one BWR and two PWRs), the staff is not able to separate out the PWR and BWR dose contributions using this data alone. Therefore, the staff must use the Millstone job and work function dose report to calculate what percentage of the total annual dose is accrued by each of the Millstone units.

8. *Estimate the resources (staff hours/contract dollars) expended per report*

Modest staff resources are needed (on the order of 0.5 to 1.0 hours per report). An additional 1 to 2 hours per report is used by the NRC contractor to tabulate data contained in the occupational dose report into a format that is suitable for inclusion into the annual NUREG-0713 dose report.

9. *Identify similar/related reporting requirements*

The work and job function dose report is required by plant Technical Specifications. This is the only reporting requirement which requires utilities to report annual doses and the number of personnel, broken down by work and job function, to the NRC. The utilities are also required to categorize these dose and personnel numbers by employee type (i.e., station, utility, or contract). Since licensees are only required to include personnel who receive greater than 100 mrem/year in this work and job function report, the resulting personnel and dose totals listed in this report do not reflect the full plant complement.

The dose report required by 10 CFR 20.407, on the other hand, provides the total number of monitored personnel and total dose received by these personnel at each LWR. 10 CFR 20.407 requires the utility to report the number of personnel receiving annual doses in each of 16 dose range intervals between zero and twelve plus person-rem. With the implementation of the revised Part 20, the 10 CFR 20.407 requirement will be replaced by 10 CFR 20.2206. Instead of reporting the number of individuals receiving doses in preselected dose intervals, licensees will now have to report the results of individual monitoring (for both external and internal occupational dose) for each individual for whom

monitoring was required. Neither the 10 CFR 20.407 or the 10 CFR 20.2206 report, however, contains information on the work or job categories of the plant personnel receiving these doses. Since both the Technical Specification and the 10 CFR 20.407/20.2206 reports contain unique data that is included in the annual NUREG-0713 dose report, both reporting requirements should be kept intact.

10. *Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated (provide differing views of other users)*

This reporting requirement provides the NRC with an accurate representation of annual plant doses broken down by work and job function. This data, in turn, is included in the annual NUREG report on occupational radiation exposures at commercial nuclear power reactors and other facilities (NUREG-0713). The NRC has published this report, in various formats, for over twenty years (job and work dose breakdowns have been included for the past fifteen years) and it is widely used by both industry and the NRC (both headquarters and the regions) as a reliable source of occupational exposure data. Deletion of this reporting requirement would eliminate the NRC's only source of plant dose data broken down by work and job function. While NUREG-0713 would still be published, very useful trending data by occupational work functions would be eliminated. In addition to use by industry, the NRR staff has made frequent use of this data to gauge the success of plant ALARA programs. Since the new Part 20 requires that each LWR establish a radiation protection program which includes provisions for keeping radiation doses ALARA, retention of this dose reporting requirement is very important to the staff. The inclusion of work and job function dose data in NUREG-0713 also provides individual plants with a means to compare their dose distributions not only with those of other plants, but with the overall industry average. In addition, NUREG-0713 provides the general public with a comprehensive source of dose information for commercial nuclear power reactors and other facilities.

11. *Discuss and justify proposed modifications to the reporting requirement (may include more than one alternative) that could reduce licensee impact while at the same time continue to meet the safety objective (if possible, quantify licensee impact); note differing views of other users; conversely, justify retaining the reporting requirement, without modification*

The current reporting requirement for the licensees to report the number of personnel and the dose by work and job function has been in effect since the late 1970s. Each licensee is required to categorize this information into six different work functions and each work function is to be categorized into five different job functions. Several years ago,

the NRC hired a contractor to assess the adequacy of the six work function categories. The outcome of the project was that each plant polled had their own preferred list of work function categories and, in a majority of the cases, the plants recommended that the dose data be categorized into many more than six work functions. Since the categorization of personnel and dose data into more than six work functions would have a greater licensee impact, the staff feels that the current reporting requirement has a minimum impact on the licensees. Any reduction in the current number of work function categories would substantially reduce the usefulness of the reported information.

12. *NRC resource cost or savings based on modifying the reporting requirement*

The cost savings would be minimal since the current cost to NRC is low.

13. *Management recommendation(s)*

Do not change the work and job function dose reporting requirement since the resulting reports provide the NRC with its only source of dose information categorized by work and job functions. As described in item 9, the dose information submitted in response to the 10 CFR 20.407/20.2206 requirements contains unique data not contained in the work and job function reports. Therefore, these reporting requirements should also be maintained. As a means of reducing the reporting burden, licensees should make use of electronic data transfers to submit the required dose information to the NRC.

T J Conget Date: 4/13/93

Lead Division Director

Division/Office: DRSS

UNS.CH

TEST CASE 11

USER NEED STATEMENT FOR NRC POWER REACTOR REPORTING REQUIREMENTS

1. Identification/Statement of reporting requirement

   TS 6.9.1.5 - Monthly Operating Reports (MOR)

   The licensee MOR contains operating statistics with data listed for the month being reported, the year-to-date and cumulative. It also includes details of unit outages and power reductions, as well as other information such as planned outages and changes in unit capacity and restrictions limiting power generation.

2. Type of report

   a. Routine report (Operating statistics and outage description for nuclear power plants)

      (i) Frequency (monthly)

      (ii) Timeliness of submittal (By the 15th of the month following the month of operation)

3. Purpose

   The original impetus for the monthly operating report came as a result of the Arab Oil Embargo of 1973-74. Prior to that time the licensees were asked to provide some of the kinds of information requested in the monthly report, but it was reported typically on a 6 month basis. The information previously requested also was not so detailed and without the specificity of the MOR requirements. For example, the licensee was asked to provide a system and component code for each outage that corresponded to the Licensee Event Report codes.

   The safety objective for the MOR was not clearly stated, but it was felt that analysis of the data would allow the agency to identify common problems or trends. NRC publication of the data received from licensees and from the regional offices was made on a monthly basis in a document that was referred to as the Gray Book (USNRC, NUREG-0020, "Licensed Operating Reactors: Status Summary Report"). It rapidly became an authoritative source on the performance of nuclear power plants. Computerization of the data allowed searches that enabled the NRC staff to obtain information on which systems and components were involved in causing automatic scrams and what corrective actions were taken. Other uses included attempting to analyze what factors impacted on plant performance. The data was also used by members of the nuclear industry and other interested parties. Other objectives included being able to compare nuclear plant performance with fossil plant performance utilizing the same definitions of capacity factor and forced outage rate, etc.

The current purpose is similar to the original purpose, but there are alternate sources for some of the information, such as 10 CFR 50.72 and 50.73 reports for scrams and information on the systems and components involved in scrams. However, the bulk of the information included in the MOR is not duplicated in other reports required by the NRC.

4. Organizations receiving the report

NRR, AEOD, Regions, ACRS, PDR and LPDRs, and IRM receive the report (RIDS distribution code: IE24D). NRC contractors such as INEL (EG&G) and Oak Ridge get the MORs as well as monthly diskettes including MOR data for all units. These diskettes have been issued by IRM covering data since January 1, 1990.

Other NRC organizations get just the monthly diskettes. The data is also entered into major NRC databases such as the Shared Information Network (SINET) and EXSIS on a monthly basis.

5. Organizations using the reports

NRR/Project Managers use the MORs for general information.

IRM uses the monthly reports to provide information to a variety of users. IRM has INEL preparing monthly diskettes and one annual report. The diskettes are distributed to many NRC offices and are also sent to licensees. Other non-NRC users can obtain a subscription for the diskettes from the Government Printing Office. IRM also makes the MORs available to DOE for use in the Waste Fund program. As indicated earlier, the data is also entered into SINET and EXSIS.

In response to a Commission directive to develop the Performance Indicator (PI) program, AEOD uses data that is reported solely in the licensee MORs to develop PIs. The data is needed to develop these meaningful and consistent measures of plant performance and their inherent safety relationships.

6. Plant specific/generic actions taken upon receiving the report

IRM does not issue any of the subject actions. AEOD has not taken any plant specific or generic actions directly upon receiving the report.

7. Identify routine analyses/staff reports generated based on the report received

IRM issues the compilation of MORs on diskette and publishes the December data in hard copy because it contains calendar year data.

NRR/Projects may use the MOR information directly for performance evaluation (Senior Management Meeting discussion, SALP preparation), but the information is usually obtained indirectly through the PI Reports.

AEOD uses data that is reported solely in the MORs to develop PIs. Of the present eight PIs, two depend on the data reported in the MORs. This data includes the number of reactor critical hours for the

equipment forced outage indicator; the forced outage hours for the equipment forced outage and forced outage rate indicators; and the outage type, whether forced or scheduled, for the forced outage rate and equipment forced outage indicators. Presently, these indicators are published formally once every quarter as the PI report (USNRC, Office for Analysis and Evaluation of Operational Data, "Performance Indicators for Operating Commercial Nuclear Power Reactors").

8. Resources (staff hours/contract dollars) expended per report

NRR/Projects expends about one hour per report.

IRM contractors spend about $60,000 a year maintaining a database and issuing diskettes. IRM enters the data into SINET and EXSIS utilizing about 0.1 FTE.

9. Identify similar/related reporting requirements

While 10 CFR Part 50.72 and 50.73 are similar for the items discussed under section 3 above, the bulk of the information included in the MOR is not duplicated in other reports required by the NRC.

10. Discuss the potential reduction in public health and safety that would result if the reporting requirement was eliminated.

Part of the NRC's mission is to provide information to the public about the performance of nuclear power plants. The MORs, the diskettes, and printed reports meet part of that mission.

Elimination of the requirement to provide the data in MORs would eliminate two of the present eight PIs that were approved by the Commission. This would eliminate two meaningful and consistent measures of plant performance and their inherent safety relationships. Elimination of the MOR requirement would therefore require the consent of the Commission.

11. Discuss and justify proposed modifications to the reporting requirement that could reduce impact while at the same time continue to meet the safety objective; note differing views of other users; conversely justify retaining the reporting requirement, without modification

Since IRM is not really a user of the MOR data no proposals on modifications are made. IRM feels that the public information aspect of the MOR justifies its retention.

Performance Indicator data is one of the fundamental tools used on a continuing basis by AEOD in our independent analysis of nuclear power plant safety performance trends. The results of such analyses are necessary for our support of various NRC tasks, such as input to the semi-annual Senior Management Meeting plant selection process.

Presently, PIs are published formally once every quarter, thus making it appear that the data is needed only quarterly. Therefore, it may appear that the operating report frequency could be changed from monthly to quarterly. However, this is not the case.

PIs are constantly updated to reflect the latest performance trends. Thus, decreasing the frequency of reporting to quarterly would greatly hinder the fulfillment of our mission, since the most current data used in developing our concerns may be as much as 6 months old. Additionally, modifications to the analysis methods used in determining the PIs are being considered by the Commission for adoption (see SECY-92-425). These modifications change the analysis from a quarterly-based system to one that is based on actual operating cycles. Accurate and continuous monthly updates of plant operational data are critical for the success of these enhanced PIs.

12. NRC resource or cost savings based on modifying the requirement

A modest reduction in contractor resources would result if reporting frequency was changed from monthly to quarterly, and a further reduction would result if the data was electronically submitted. Data quality assurance checks and reviews would remain at about the same level. AEOD is working with IRM to eliminate delays in receiving reports by making electronic data interchange the preferred method of submittal.

13. Management recommendations

IRM recommends not changing reporting frequency since that would limit the usefulness of the information to many users and would not result in a significant resource or cost saving.

AEOD also recommends not changing the reporting frequency for licensee MORs since a reduced frequency would limit the usefulness of the information to AEOD and would not result in a significant resource or cost saving. AEOD continues to need the reactor critical hours and outage data in the MOR in its present form and frequency.

Because of our reliance on and requirement for accurate monthly operating history information, we strongly recommend not changing the frequency of the MORs to quarterly. In fact, our need for this information is so critical that we are experiencing difficulties in timely analysis due to the inherent slowness in the present reporting method. By the time the licensee reports are received through the mail by us and are available in database format, nearly 2 months have passed. We are working with Information Resource Management (IRM) to eliminate much of this delay by making electronic data interchange (EDI) of this information the preferred method of submittal.

D M Crutchfield Date: 3/31/93
Division Director

Division/Office: DSP/AEOD

ADDITIONAL TASK FORCE COMMENTS

The task force to review the reporting requirements for power reactor licensees has the following additional comments to make concerning the recommendations of the line organization that prepared the User Need Statement for the subject reporting requirement:

SUBJECT: Technical Specification 6.9.1.5 - Monthly Operating Reports

ORGANIZATION: Division of Safety Programs, AEOD

1. The Division of Safety Programs (DSP) notes in the User Need Statement that information reported in the Monthly Operating Reports (MORs) is used to develop 2 of the 8 Performance Indicators for commercial nuclear power reactors. DSP further notes that this information is currently only available through the MORs. As a result, the task force agrees that the MORs should be retained. However, since no safety argument has been presented to justify continuing to receive and compile all of the information now provided, the information reported in the MORs should be reduced to that which is needed to support the Performance Indicator program. This could be implemented by a line-item improvement to the new Standard Technical Specifications and a generic letter, allowing licensees to adopt the technical specification change through the license amendment process.

RELATIONSHIP OF TASK FORCE EFFORT ON REPORTING REQUIREMENTS TO

STUDY CONDUCTED BY THE COMMITTEE TO REVIEW GENERIC REQUIREMENTS

Additional relevant background includes other ongoing efforts to reduce the burden of government regulation, including two Presidential directives of January 28, 1992. These directives requested that the Commission and other energy and environmental agencies work together to streamline regulatory requirements and set aside a 90-day period for the evaluation of existing regulations. The Commission directed the Committee to Review Generic Requirements (CRGR) to use appropriate inputs from the public, the NRC staff, and other Federal agencies to conduct a special regulatory review addressing the spirit of the concerns raised by the President. After completing its review, the CRGR recommended revising the regulations in eight areas (SECY-92-141, dated April 17, 1992) for which the CRGR could clearly make a determination in the allotted 90 days that a reduction in the regulatory burden could be achieved without in any way reducing the public health and safety or common defense and security.

In conducting its review, the CRGR issued a Federal Register notice on February 24, 1992 (57 FR 6299), seeking public comment, and also sought comments from the NRC staff; the CRGR held a public meeting to discuss the comments that were received. Among other concerns, the industry considered the magnitude of reporting requirements to be burdensome and some reporting requirements to be unnecessary. In addition, the industry expressed concern over NRC guidance documents issued to provide interpretations of reporting requirements in the regulations and over reporting requirements contained in license documents such as the technical specifications. Because many of the comments received were outside the scope or criteria of the special CRGR review, their resolution was deferred to other agency initiatives for evaluating reporting requirements. Therefore, the staff decided to expand the scope of the task force effort on reporting requirements, and consider the potential for reducing reporting requirements in a comprehensive and integrated manner. As a result, the staff issued a Federal Register notice on June 19, 1992 (57 FR 27394), with respect to power reactor reporting requirements. The comments received in response to this Federal Register notice are discussed, as appropriate, in this paper.

USER NEED STATEMENT FOR NRC POWER REACTOR REPORTING REQUIREMENTS

ENCLOSURE 4

USER NEED STATEMENT FOR NRC POWER REACTOR REPORTING REQUIREMENTS *

BACKGROUND

The Commission has requested that staff evaluate user needs for current reporting requirements with a view towards reducing the reporting burden on licensees. The goal of this evaluation is to identify reporting requirements that can be eliminated, or otherwise reduced or changed, while continuing to meet staff obligations to protect the health and safety of the public. This request is the first step in that process. Thank you for your time.

INSTRUCTIONS

You will be asked to complete four steps as a way of providing user input into the evaluation of reporting requirements. The information that you provide is essential to the evaluation of reporting requirements.

Step 1: The information requested includes: the Rule (or prescribing document) specifying the reporting requirement, the type of report and frequency with which it is required to be reported, and the original intent of the reporting requirement (as stated in the original statement of consideration or latest publication of the Rule [or prescribing document]).

Step 2: Assess the redundancy or similarity to other reporting requirements.

Step 3: Identify the users of the reported information. That is, in addition to you, the primary user, who are the other users of this information?

Step 4: Answer relevant questions and make a final recommendation for the reporting requirement.

Return the completed User Need Statement and, as appropriate, the Auxiliary User Need Statements to _____[Insert name and address of individual to whom the forms should be returned].

* An alternative form that requires initial administrative staff effort to document Step 1 information was also developed, but is not presented here.

REPORTING REQUIREMENTS

Step 1: Identify Rule (or prescribing document) reporting information.

a. You have been identified as the key user of information reported. The Rule (or prescribing document) is:

b. The reporting requirement states that:

c. The original intent of this reporting requirement was (obtain this from the original or latest publication of the requirement):

d. This report is:

- ☐ a routine report.
- ☐ a special report.
- ☐ an operational event report.
- ☐ other (please specify).

e. This report is submitted _____(please specify the frequency and timeliness required for this report, e.g., within X days following the end of reporting period Y),

OR

This report is submitted after an occurrence; that occurrence is _____ (specify occurrence such as a shutdown, refueling outage, test, operational event, etc.) and the report is submitted _____ (specify timeliness of the submittal, e.g., within X hours or X days of the occurrence).

Step 2. Assess redundancy of reporting requirements. Please list below any reporting requirements that may be redundant or similar to this reporting requirement.

Step 3. Identify the users of the reported information. Provide a list of the organizations who may use this report following these instructions. Beginning with the RIDS distribution list, please contact each of these organizations to determine their use of the reported information. For those who are on the RIDS list and other organizations that you know of who use this reported information, please follow the instructions described in the attachment called "Auxiliary User Need Statement for NRC Power Reactor Reporting Requirements."

The NRC organizations or other organizations that receive this report are (insert RIDS list and list any other organizations who may use this report):

Attach all Auxiliary User Needs Statements to this User Needs Statement.

Step 4: Answer questions and make recommendations.

1. What is the current purpose of this reporting requirement? Check boxes that apply.

   ☐ Same as originally stated. (See Step 1)

   ☐ No current purpose.

   ☐ Additional purpose(s); these are:

2. What plant-specific or generic actions are taken upon receiving this report? Include, for example, routine analyses performed and staff reports generated.

3. What are the contributions to the NRC's mission of maintaining public health and safety that are provided by this reporting requirement?

4. Please estimate the resources (staff hours and contract dollars) expended to review, analyze, and report on the information/data that is reported in accordance with the requirement.

5. If this reporting requirement was eliminated, what would be the potential risk to public health and safety?

6. What modifications to the current reporting requirement would you recommend? List alternatives.

   Provide the rationale for each recommended modification.

   Describe the impact of the modification(s) on the licensee reporting burden and the safety objective.

7. Please estimate the resource costs or savings to the NRC based upon modifying or eliminating the reporting requirement. Do not include an estimate of the resources required to conduct a rule change or revise the prescribing document.

8. Disregarding, for the moment, the resources needed to change the requirement, what action(s) do you recommend that the NRC take regarding this reporting requirement? Check all that apply and provide information as requested.

   ☐ Keep the reporting requirement the same--no changes.

   ☐ We don't need this reporting requirement any more--let's get rid of it.

   ☐ Our organization doesn't need this any longer but other NRC or licensee organizations do. Based upon information reported on "Auxiliary User Need Form(s)," those organizations and their reasons for needing the information are

   ☐ This information can be obtained without this reporting requirement; the alternative source is

   ☐ Modify the requirement as described above in #6 or as we have specified below in #10 (overall recommendations). Include the reasoning behind each proposed change.

☐ We need this reporting requirement but do not have enough resources to effectively analyze, use, and report on the information received. What we would like to do is

☐ Other (please specify).

9. What resources do you estimate would be required to take the action(s) that you have suggested above? Include costs of a rule revision as appropriate.

10. What are your overall recommendations regarding this reporting requirement?

11. Please describe any other comments or information related to this requirement that would assist us in improving the requirement or reducing the reporting burden of NRC licensees.

Lead Division Director	Date
Division/Office	

INSTRUCTIONS FOR PRIMARY USER TO ADMINISTER AUXILIARY USER NEED STATEMENT

INSTRUCTIONS FOR PRIMARY USER TO ADMINISTER AUXILIARY USER NEED STATEMENT

As the primary user of the reporting requirement, you are requested to obtain user information from secondary users. The general process is to complete Steps 1 and 2 of the User Need Statement and then contact all other potential users from the RIDS list and any other users that you know of. After calling them, you will ask them to complete the Auxiliary User Need Statement and return it to you. The specific instructions are outlined below.

1. **Complete Steps 1 and 2 of the User Need Statement.** Completion of Steps 1 and 2 will allow you to complete the information on the Auxiliary User Need Statement.

2. **Complete Reporting Requirement Information on the Auxiliary User Need Statement.** Review the Auxiliary User Need Statement. It follows the general format of the User Need Statement that you have been working on. In Steps 1, 2, and 3 in the Auxiliary User Need Statement, you (as the primary user) must complete the information outlined in this survey. You can easily provide this information from completing Steps 1 and 2 (of the primary User Need Statement) as instructed above. The Auxiliary Statement indicates where to insert the information. You will need to provide:

   - correct regulation/requirement designation
   - text of regulation/requirement designation
   - original intent of the regulation/requirement
   - type of report and the frequency and timeliness required for reporting
   - users of reported information
   - redundant or similar reporting requirements

   Generally, you will provide the information that you have about the reporting requirement that you provided in Steps 1 and 2.

3. **Complete Step 3 on the User Need Statement.** After inserting the appropriate information on the Auxiliary User Need Statement, you need to follow the instructions for completing Step 3 and contact the organizations that use the reported information. The RIDS list is the best starting point. After contacting all the organizations, send them the Auxiliary User Need Statement with the information that you provided. Organizations who no longer use the requirement should be contacted and should still complete the Auxiliary User Need Statement. They will only have to state that they no longer use the reported information. Make sure that you indicate

that you are the primary user and that they should send the completed form back to you when they are done. Specify that they are to return the form within two weeks.

4. **List all Users Contacted**. After contacting all possible users and sending them Auxiliary Statements, list those organizations in Step 3. Please list these organizations, whether or not they returned the completed Auxiliary Statement.

5. **Collect User Need Statements and Return Them to the Committee**. After you have received the Auxiliary Statements, review them. You may use information from these Auxiliary Statements in making your recommendations (see Item #8 of the User Need Statement). Attach the completed Auxiliary Statements to your completed User Need Statement.

AUXILIARY USER NEED STATEMENT FOR NRC POWER REACTOR REPORTING REQUIREMENTS

Primary User: [Name/Location/Phone]

BACKGROUND

The Commission has requested that staff evaluate user needs for current reporting requirements with a view towards reducing the reporting burden on licensees. The goal of this evaluation is to identify reporting requirements that can be eliminated, or otherwise reduced or changed, while continuing to meet staff obligations to protect the health and safety of the public. You have been identified as a user of this reporting requirement by the primary user and are requested to complete this form and return it to the primary user specified above. Thank you for your time.

INSTRUCTIONS

You will be asked to complete four steps as a way of providing user input into the evaluation of reporting requirements. The information that you provide is essential to the evaluation of reporting requirements.

Step 1: Review the information provided here.

Step 2: Assess the redundancy or similarity to other reporting requirements.

Step 3: Identify the users of the reported information. That is, in addition to you and the primary user, identify other users of this information.

Step 4: Answer relevant questions and make a final recommendation for the reporting requirement.

Return the completed Auxiliary User Need Statement to the Primary User noted above.

REPORTING REQUIREMENTS

Step 1: Review the information.

You have been identified as a user for information reported in accordance with [primary user will insert correct regulation/requirement designation here]. The requirement states that [insert text here].

The original intent of this requirement was [primary user will insert intent obtained from the original or latest publication of the requirement].

This is a [primary user will insert type of report] report that is submitted [primary user will insert frequency and timeliness of report] **OR** after [primary user will specify occurrence prompting the report and timeliness].

Step 2. Assess redundancy of reporting requirements. Listed below are reporting requirements that may be redundant or similar to this reporting requirement. Please review these requirements to assess whether information from these requirements could substitute for or augment information from this reporting requirement. Please add any additional requirements that you believe are related.

Related or redundant requirements are [primary user will insert similar requirements here].

List any additional redundant or similar requirements here:

Step 3. Identify the users of the reported information. Below is the list of organizations who receive this report. If you know of other organizations that use this report and are not listed, please list those additional organizations.

The NRC organizations and other organizations that receive this report are [primary user will insert RIDS and other distribution lists].

Please list any other organizations using the reported information:

Step 4: Answer questions and make recommendations.

1. What is the current purpose of this reporting requirement? (Check boxes that apply)

   ☐ Same as originally stated (see Step 1)

   ☐ No current purpose

   ☐ Additional purpose(s); these are:

2. What plant-specific or generic actions are taken upon receiving this report? Include, for example, routine analyses performed and staff reports generated.

3. What are the contributions to the NRC's mission of maintaining public health and safety that are provided by this reporting requirement?

4. Please estimate the resources (staff hours and contract dollars) expended to review, analyze, and report on the information/data that is reported in accordance with the requirement.

5. If this reporting requirement was eliminated, what would be the potential risk to public health and safety?

6. What modifications to the current reporting requirement would you recommend? List alternatives.

   Provide the rationale for each recommended modification.

   Describe the impact of the modification(s) on the licensee reporting burden and the safety objective.

7. Please estimate the resource costs or savings to the NRC based upon modifying or eliminating the reporting requirement. Do not include an estimate of the resources required to conduct a rule change or revise the prescribing document.

8. Disregarding, for the moment, the resources needed to change the requirement, what action(s) do you recommend that the NRC take regarding this reporting requirement. Check all that apply and provide information as requested.

☐ Keep the reporting requirement the same--no changes.

☐ We don't need this reporting requirement any more--let's get rid of it.

☐ Our organization doesn't need this any longer but other NRC or licensee organizations do.

☐ This information can be obtained without this reporting requirement; the alternative source is

☐ Modify the requirement as described above in #6 or as we have specified below in #10 (overall recommendations). Include the reason behind the proposed change.

☐ We need this reporting requirement but do not have enough resources to effectively analyze, use, and report the information received. What we would like to do is

☐ Other (please specify).

9. What resources do you estimate would be required to take the action(s) that you have suggested above? Include costs of a rule revision as appropriate.

10. What are your overall recommendations regarding this reporting requirement?

11. Please describe any other comments or information related to this requirement that would assist us in improving the requirement or reducing the reporting burden of NRC licensees.

Division Director	Date
Division/Office	