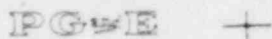


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DOCKET NUMBER PR-50
PROPOSED RULE (47 FR 19543)

July 13, 1982



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Re: Proposed Rule for
Licensee Event Report System

Dear Sir:

Pacific Gas and Electric Company is pleased to have the opportunity to comment on the proposed rule for "Licensee Event Report System" described in the Federal Register of May 6, 1982 (47FR19543). The attached comments reference the paragraphs in the proposed rule.

Very truly yours,

Philip A. Crane, Jr.

Attachment

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Frederick
Hebdon
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Acknowledged by card. 7/19/82 mdv

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PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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ATTACHMENT

PGandE Comments on Proposed Rule for
Licensee Event Report System

PGandE believes that the proposed rule to change the required form and content of the Licensee Event Report ("LER") is sound. The proposed rule fills the need which exists to separate potentially significant events for careful analysis from those events which are not individually significant. Many of the less significant events currently reported in LERs will, after approval of the rule, be reported through use of the Institute of Nuclear Power Operations ("INPO")'s Nuclear Plant Reliability Data System ("NPRDS").

The following are specific comments on the content of the proposed rule:

Comment 1 - Reporting Alternatives

We agree with the suggestion in the Federal Register that combining the existing 10CFR50.72, "Notification of Significant Events," and the proposed 10CFR50.73 into a single final rule would clarify and ease the reporting of such events.

We also agree with the three categories of reporting discussed in the overview of the LER system. These are:

1. Prompt notification with no written report;
2. Prompt notification with a written report; and
3. A written report only.

If an event falls within the categories described above which require a written report, PGandE believes the written report should be required to be submitted within thirty days of the event instead of the fifteen days being alternatively considered. The longer time period would allow more time to complete a comprehensive evaluation of the event or occurrence.

Comment 2 - 10CFR50.73(a)(1)

We believe that the rule should not require the reporting of all actuation of the Engineered Safety Features ("ESF") and the Reactor Protection System ("RPS"). For example, a spurious actuation caused by a human error need not be reported in the new LER format, since the report has been designed to report only significant events. An event of this type would be adequately covered in the monthly operating report. We believe, however, that consideration should be given to revising this paragraph or adding a new paragraph to require reporting of individually insignificant multiple errors or failures which cause actuation of the ESF or RPS.

Comment 3 - 10CFR50.73(a)(6)

Events reported under this paragraph may of necessity include security safeguards information. We believe that provisions should be included for withholding information reported under this paragraph from public disclosure.

Comment 4 - 10CFR50.73(a)(7)

We believe that this paragraph, which requires reporting of forced evacuations of rooms or buildings because of radioactive releases, is not required. Any in-plant radioactive release which threatens the safety of nuclear plant or site personnel in the performance of duties necessary for safe operation would be reported under proposed paragraph 10CFR50.73(a)(6). Any other in-plant release would be reported by other methods and does not require the LER format for reporting.

Comment 5 - 10CFR50.73(b)(2)(v)

We believe that the use of the Energy Industry Identification System number ("EIIS") should not be included. EIIS is not widely used and there is no apparent justification for its use.

Comment 6 - 10CFR50.73(c)

In the event that the NRC Staff requires supplemental information and/or assessments, we believe that the time period allowed for preparation of the submittal should be mutually agreed upon by the NRC Staff and the licensee. This is desirable in order to avoid placing unreasonable manpower requirements on the licensee.

Comment 7 - NPRDS Number

We understand that the new LER form being drafted includes the NPRDS report number. However, we believe that the NPRDS report number should not be required on the LER, since the NPRDS report may be prepared after the LER is submitted.