



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAR 14 1983

MEMORANDUM FOR: William J. Dircks  
Executive Director for Operations

FROM: Victor Stello, Jr., Chairman  
Committee to Review Generic Requirements

SUBJECT: MINUTES OF CRGR MEETING NUMBER 32

The Committee to Review Generic Requirements met on Thursday, February 17, 1983, from 1-5 p.m. A list of attendees is enclosed.

F. Hebdon (AEOD) and W. Mills (IE) jointly presented for Committee review the proposed revision to 10 CFR 50.72, Immediate Notification Requirements (INR rule) and the proposed rule 10 CFR 50.73, Licensee Event Reporting (LER rule). The Committee addressed these rulemaking actions jointly because they are closely related and, along with the Nuclear Plant Reliability Data System (NPRDS) managed by INPO, are important parts of the coordinated NRC and industry operational data reporting efforts that have the objective of enhancing the safety of licensed nuclear power plants.

The INR rule and the Emergency Notification System (ENS) are intended to provide for timely notification of the NRC and other organizations should safety significant events occur at a plant. The LER rule will require the reporting of plant operational event experience to allow the staff to study operational experience primarily to identify accident precursors and thereby take timely action to prevent or mitigate similar or potentially more safety significant events.

The NPRDS, which is currently a voluntary industry program, is intended to collect and assess plant component failures (reliability data). The Committee noted that, if the NPRDS does not meet NRC's need for component failure data in the future, the staff intends to proceed with rulemaking to make the NPRDS mandatory and combine it with the LER system to form an integrated operational experience reporting system.

As presented to the Committee, the proposed LER rule concerns the 30-day significant event reporting requirements applicable to licensed nuclear power reactor plants. To assure consistency with the INR rule, immediate notification requirements and related LER requirements have been coordinated with the LER rule. The LER rulemaking package is intended to:

- ° Modify and codify the existing LER requirements that define the events that must be reported and define the information that must be provided in each report.

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- ° Eliminate unnecessary and redundant reporting requirements. Only significant events are required to be reported and only one written report, an LER, is required for each significant event.
- ° Modify 10 CFR Parts 20.402, 20.403, 20.405, and 50.36 to conform with the LER and the INR rules in order to establish a single set of reporting requirements. The criteria contained in the subject sections, which define a reportable event, have not been modified. Similar changes are also planned as part of current activities to make more substantive changes to 10 CFR Parts 21, 50.55(e) and 73.71.

The annual reporting and recordkeeping burden on the industry to implement the proposed LER rule is estimated by the staff to be 22 LERs or 1,100 staff hours per plant (excluding analysis effort) and is estimated, based on INPO's comments, to be 2,600 staff hours per plant (including analysis effort). Therefore, the estimates of burden associated with implementing the LER rule range from 1,100 to 2,600 staff hours per plant. The staff believes that the burden will be closer to the lower end of the range. The annual NRC burden is estimated to be 80 hours per plant and \$1.2 million in program support funds (including analysis effort). The staff estimates the current burden to be 59 LERs or 1,475 staff hours per plant (excluding analysis). INPO estimates the current burden to be 3,000 staff hours per plant (including analysis). Considering either estimate, the staff believes that there will be a net reduction in the existing LER burden by adoption of the proposed LER rule.

As presented to the Committee, the INR rule concerns significant event immediate reporting requirements applicable to licensed nuclear power plants. To assure consistency, the INR rule revision was coordinated with the LER rule. The INR rule revision package is intended to:

- ° Modify 10 CFR 50.54 to incorporate the immediate notification requirements of 10 CFR 50.72 as a condition in every operating license granted under sections 103 and 104b of the Atomic Energy Act.
- ° Modify the existing INR rule to clarify and narrow the scope of reporting requirements, raise the threshold for reporting, permit more time for reporting, coordinate other reporting requirements and include certain events that were not previously included in the rule. Reporting of "Unusual Event" as defined in NUREG 0654 will not be required in the proposed revision of the INR rule. Instead, the INR rule revision will provide revised criteria which require reporting similar events as "Non-Emergency Events." The proposed revision provides for reporting these events within 1 hour and other less significant events within 4 hours.
- ° Eliminate unnecessary and redundant reporting. Only safety significant events are required to be immediately reported and only one immediate

report is required for each event. Events having little safety significance (i.e., inquiries, minor radiological releases and security degradation) need not be reported.

- ° Modify portions of 10 CFR Part 50, Appendix E and supersede Reg. Guide 1.16 and portions of NUREG-0654. To expedite conforming modifications, proposed changes are being prepared with the intent to publish for public comment at the same time the proposed INR rule revision is promulgated. The LER rulemaking package includes modifications to 10 CFR Part 20 to conform with the INR rule as revised. The INR rule revision is being coordinated with current development of proposed revisions to 10 CFR Parts 21, 50.55(e), Appendix E and NUREG 0654. After these revisions are made (within 1 year), the subject requirements will conform with the INR rule.

If the proposed revision of 50.72 is promulgated, the industry annual cost for reporting is estimated to be reduced approximately 40 percent from the current level of about 6 staff hours per plant. However, for approximately half of this savings to be realized 10 CFR 73.71 needs to be revised with regard to reporting of security events. The annual cost to NRC is estimated to be the same as that for industry.

The subject of reporting requirements for licensed nuclear power plants has been addressed at previous CRGR meetings (2 and 28). Enclosure 7 of SECY-82-3, dated January 4, 1982, included Committee recommendations and the staff's plan to address those recommendations. The Committee recommendations and staff plan were reiterated at CRGR Meeting No. 28. The Committee understood that the subject rulemaking actions would have the following objectives concerning licensed nuclear power plants:

- ° Capture all events of safety significance in a timely manner while eliminating unnecessary reports, such as nonconsequential personnel injuries.
- ° Coordinate reporting with 10 CFR Part 50 Appendix E, Part 21, and sections 20.402, 403, 405, and 10 CFR 73.71.
- ° Combine in 10 CFR 50.72 "Unusual Events" the prompt reporting criteria previously in NUREG-0654.

The Committee previously suggested that the subject rulemaking actions should address coordination of all NRC notification and reporting requirements concerning licensed power reactors and should require no more than three notification/reporting intervals; e.g., 1 hour, 1 day and 30 days.

In this regard, the Committee believes that the LER rule has achieved the intended objectives. However, in regard to the proposed revision of the INR rule, the Committee was concerned that additional actions requiring another year are necessary to fully achieve the aforementioned objectives. Specifically, 10 CFR 21, 50.47, 50.55(e) 50-Appendix E, 73.71 and NUREG-0654

require revision to fully achieve the objectives. Also, events other than emergencies (unusual events) will continue to be reported like emergencies since they are included in the emergency classification.

The Committee judged that the following issues should be resolved and thereafter the subject rulemakings should go forward:

- (a) All program office and regional comments should be addressed;
- (b) The immediate notification requirements should be reviewed to see if immediate reporting of non-emergency events can be further minimized or perhaps eliminated.
- (c) The proposed criteria 50.73(a)(2)(i)(B) and 50.73(a)(2)(vii) should be reconsidered to determine whether revisions are necessary;
- (d) The proposed criterion 50.72(c)(4)(i) should be reviewed and changed if necessary to make clear whether or not it concerns normally monitored readings.

The Committee agreed that a task group consisting of J. Heltemes, E. Jordan, D. Eisenhut and J. Scinto would represent the Committee to assure that these issues are resolved satisfactorily. If these issues are not resolved by about March 15, 1983, the group will return to the CRGR with sharply defined issues for expeditious review.

The Committee further recommended that actions be expedited by the staff to modify existing immediate reporting requirements in 10 CFR Parts 21.50.55(e), 73.71, 50.47, 50 Appendix E, and NUREG-0654, agreements with organizations external to NRC and any other immediate reporting requirements concerning licensed nuclear power reactors to fully achieve the aforementioned objectives. These actions should be completed as soon as possible, but not later than 1 year after the proposed rulemaking actions are effective. If possible, an advanced notice of proposed rulemaking concerning these actions should accompany the subject proposed rulemaking actions.

By way of guidance to the staff in implementing the rules after they take effect, the CRGR suggested that both the NRC staff and industry be made clearly aware that:

- (a) The subject rules are concerned with plant safety.
- (b) Immediate notifications should be primarily concerned with reporting the best information currently available concerning an event. Identifying the regulatory requirement applicable to the notification is of secondary importance.

(c) The INR rule and the ENS are intended for safety significant events of an urgent nature. Immediate notifications for nonurgent events should be discouraged.

Original signed by  
Victor Stello

Victor Stello, Jr., Chairman  
Committee to Review Generic Requirements

Enclosures:

1. List of Attendees

cc: Commission (5)  
Regional Administrators  
CRGR Members  
G. Cunningham, ELD  
SECY  
W. Mills

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ATTENDANCE RECORD FOR

CRGR MEETING NO. 32

(2/17/83)

CRGR Members

V. Stello, Chairman  
D. Eisenhut, NRR  
J. Heltemes, AEOD  
D. Ross, RES  
E. Jordan, IE  
W. Olmstead, ELD for J. Scinto  
D. Chappell, NMSS for R. Cunningham

Others

F. Hebdon, AEOD  
C. Michelson, AEOD  
T. Murley, DEDROGR/D  
W. Schwink, DEDROGR staff  
W. Mills, IE  
E. Weiss, IE  
T. Allan, NMSS/SG  
K. McConnell, NMSS/SG  
J. Metzger, NMSS/SG  
J. Wigginton, IE  
Cookie Ong, OPE  
K. Bissell, COM  
S. Stern, NRR  
T. Ippolito, NRR  
J. Beard, NRR  
R. Cleveland, NRR  
J. Philips, ADM  
F. Cameron, RES  
C. Schulten, RES  
W. Kane, DEDROGR staff  
D. Matthews, RES  
J. Joosten, COM  
M. Taylor, DEDROGR staff