



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
FEB 06 1991

AC 91-1
PDR

MEMORANDUM FOR: A. Bill Beatty, Director
Division of Radiation Safety and Safeguards, RIV

FROM: Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

SUBJECT: PROPOSED RULE ON NOTIFICATION OF INCIDENTS

We have reviewed the memorandum that you transmitted to us on January 8, 1991, recommending that additional requirements for reporting contamination events should be added to the proposed rule on notification of incidents. You noted that changes to the rule suggested in a memorandum dated October 24, 1990, only addressed accidental contamination and did not appear to address soil or water contamination caused by normal licensee operations. You cited recent experiences at Sequoyah Fuels and tracer study sites as examples of significant contamination events that should be reportable under the rule.

We agree that unintentional contamination of soil and groundwater should be reportable regardless of whether the events that caused the contamination were planned or not. We will review the draft language of the final rule to ensure that events such as "sand-outs" during tracer studies and the contamination at Sequoyah Fuels are addressed. We have asked RES to include the regions in the next request for comments on the final rule. We appreciate your input. If you have any questions, please contact Kevin Ramsey at (FTS) 492-0534.

for John E. Allen
Richard E. Cunningham, Director
Division of Industrial and
Medical Nuclear Safety, NMSS

cc w/incoming:

S. Bahadur, RES
J. Lieberman, OE
M. Knapp, RI
J. Stohr, RII
C. Norelius, RIII
R. Scarano, RV

Moat F/ Joe M

I didn't think the package was going to the regions one more time. Is this time.

*Shir B
2/7*