

Southern Nuclear Operating Company
Post Office Box 1295
Cummingsville, Alabama 35201
Telephone 205 898-5066

John L. Crooke
56 FR 50598
10/7/91



Southern Nuclear Operating Company

January 31, 1992 *the southern electric system*

DS09

J. D. Woodard
Vice President
Farley Project

Docket Nos. 50-348
50-364

36

92 FEB -7 A7:58

REGULATORY PUBLICATIONS BR.

Mr. David L. Meyer, Chief
Regulatory Publications Branch
Division of Freedom of Information
and Public 'tion Services
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Comments on Draft Report, NUREG-1022, Revision 1
"Event Reporting Systems-10 CFR 50.72 And 50.73;
Clarification of NRC Systems and Guidelines for Reporting"
(56 Federal Register 50598 of October 7, 1991)

Dear Mr. Meyer:

Southern Nuclear Operating Company has reviewed the draft report, NUREG-1022, Revision 1, "Event Reporting Systems-10 CFR 50.72 And 50.73; Clarification of NRC Systems and Guidelines for Reporting," published in the Federal Register on October 7, 1991. In accordance with the request for comments, Southern Nuclear Operating Company is in total agreement with the NUMARC comments which are to be provided to the NRC. Additionally, the BWR Owners' Group is providing comments on this document which we believe to be appropriate and beneficial.

Southern Nuclear supports the efforts of the Staff to clarify existing reporting guidance. We wish to emphasize that such clarification should not result in an unwarranted expansion of reporting obligations. As reflected in the comments referenced above, the new guidance related to reporting of events outside the design basis of the plant alone will account for a significant increase in the number of LERs. Also the redefinition of Engineered Safety Feature (ESF) systems for reportability purposes in the draft NUREG-1022, Revision 1, and the broadly based definition of ESF actuations (including ESF actuations from non-ESF signals) will only result in the increased reporting of events of little or no safety significance.

Should you have any questions, please advise.

Respectfully submitted,

J. D. Woodard
J. D. Woodard

9202110149 520131
PDR NUREG
1022 C PDR

Mr. David L. Meyer
U.S. Nuclear Regulatory Commission

Page 2

cc: Mr. S. D. Ebner
Mr. S. T. Hoffman
Mr. G. F. Maxwell