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FPL

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John L. Crookes

56 FR 50598

10/1/91

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10 CFR § 50.72 .73

92 FEB -5 AM 59

REGULATORY PUBLICATIONS BR

David L. Meyer, Chief
Regulatory Publications Branch
Division of Freedom of Information
and Publication Services
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Event Reporting Systems -- 10 CFR § 50.72 and 50.73:
Clarification of NRC Systems and Guidelines for
Reporting (NUREG-1022, Rev. 1)
56 Fed. Reg. 50598 (October 7, 1991)
Request for Comments

Dear Mr. Meyer:

On October 7, 1991, the U. S. Nuclear Regulatory Commission (NRC) published for public comment a Notice of Availability (56 Fed. Reg. 50598) of draft NUREG-1022, Revision 1, "Event Reporting Systems -- 10 CFR § 50.72 and 50.73: Clarification of NRC Systems and Guidelines for Reporting." These comments are submitted on behalf of Florida Power and Light Company (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

The Nuclear Management and Resources Council (NUMARC) is offering comments on the subject proposed revision to NUREG-1022. FPL endorses the NUMARC comments and recommendations.

The Nuclear Utility Backfitting and Reform Group (NUBARG) is also offering comments on the subject proposed revision to NUREG-1022. FPL endorses the NUBARG comments and recommendations.

For the reasons discussed in both the NUMARC and NUBARG comment letters, FPL, as well, urges the Commission to delete those portions of the proposed guidance which are contrary to the existing language of the regulations, and to perform a backfitting analysis of the portions of the guidance that are premised on new or different Staff positions.

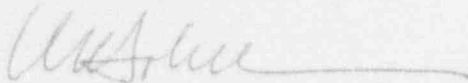
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Page 2 of 2

FPL's general concern over the positions in the draft NUREG is that they would result in a substantially increased reporting obligation with no evidence that these positions would produce any material increase in plant safety. FPL would prefer to continue to utilize the existing guidance for reporting versus the draft revision to NUREG-1022.

FPL appreciates the opportunity to submit these comments.

Very truly yours,



W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/DMB