

DS09

John L. Crooks
56 FR 50598

Omaha Public Power District
444 South 16th Street Mail
Omaha, Nebraska 68102-2247
402/636-2000

10/7/91

38

January 31, 1992
LIC-92-049

92 FEB -7 AMO :29

BOOKLET USNRC
REGULATORY PUBLICATIONS BR

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

- References:
1. Docket No. 50-285
 2. 56 Federal Register 50598, October 7, 1991

Gentlemen:

Subject: Draft NUREG 1022, Revision 1

The purpose of this letter is to respond to the Nuclear Regulatory Commission (NRC) request for comments related to NUREG-1022, Revision 1 (Reference 2).

The Boiling Water Reactors Owners' Group (BWROG) and Nuclear Management and Resources Council (NUMARC) are submitting extensive comments on this draft NUREG. Omaha Public Power District (OPPD), while not a member of the BWROG, was actively involved with this group in the review of the subject document. Based on OPPD's review of the draft NUREG, the comments being submitted by both the BWROG and NUMARC, and plant specific projections for Fort Calhoun Station, OPPD fully supports and endorses the positions being submitted by these groups.

It is OPPD's position that NUREG-1022, Revision 1 represents an expansion of the reporting requirements that are currently implemented through 10 CFR 50.72 and 10 CFR 50.73, and would result in a significant increase in the staff hours required to support these changes, without an appreciable benefit related to capturing "safety significant" events.

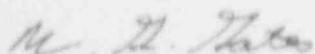
Based on these reviews and comments, OPPD recommends that the staff positions as promulgated in the draft NUREG not be implemented pending further review and revision to this document.

9202130048 920131
PDR NUREG
1022 C PDR

U. S. Nuclear Regulatory Commission
Page Two
LIC-92-049

If you have any questions, please contact me.

Sincerely,



W. G. Gates
Division Manager
Nuclear Operations

WGG:lah

c: LeBoeuf, Lamb, Leiby & MacRae
U. S. Nuclear Regulatory Commission, Document Control Desk
R. D. Martin, NRC Regional Administrator, Region IV
D. L. Wigginton, NRC Senior Project Manager
R. P. Mullikin, NRC Senior Resident Inspector