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DOCKET NUMBER
PROPOSED RULE PR 50
(57 FR 28642)

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DOCKETED
USNRC



J. D. Woodard
Vice President
Farley Project

'92 JUL 31 p3 Southern Nuclear Operating Company
the southern electric system

Docket Nos. 50-348
50-364

July 27, 1992
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Service Branch

Comments on Proposed Rule
"Minor Modifications to
Nuclear Power Reactor Event Reporting Requirements"
(57 Federal Register 28642 of June 26, 1992)

Dear Mr. Chilk:

Southern Nuclear Operating Company (Southern Nuclear) has reviewed the proposed rule, 10 CFR Part 50, "Minor Modifications to Nuclear Power Reactor Event Reporting Requirements," published in the Federal Register on June 19, 1992. In accordance with the request for comments, Southern Nuclear is in total agreement with the NUMARC comments which were provided to the NRC.

In addition to the NUMARC comments, Southern Nuclear would like to add the following comment. The scope of the Engineered Safety Features (ESF) actuations which would be exempt from reporting under the proposed rule should not be limited to those specified. If an ESF actuation is truly invalid, it should not be reportable under 10 CFR 50.73(a)(2)(iv). No "event" or "condition" exists when an invalid ESF actuation occurs. This type of ESF actuation would have little or no safety significance. Therefore, ANY invalid ESF actuation should be exempt from the reporting requirement.

Should you have any questions, please advise.

Respectfully submitted,

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J. D. Woodard

JDW/JMG

cc: Mr. S. D. Ebnetter
Mr. S. T. Hoffman
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