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VIRGINIA POWER

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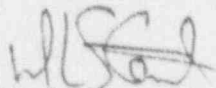
COMMENTS ON PROPOSED REVISION TO 10 CFR 50
MINOR MODIFICATIONS TO NUCLEAR POWER REACTOR
EVENT REPORTING REQUIREMENTS

Gentlemen:

In its Federal Register Notice RIN 3150-AE12 dated June 26, 1992, the NRC issued a proposed rulemaking to amend its regulations to make minor modifications to the current nuclear power reactor event reporting requirements. The proposed amendments would delete reporting requirements for some events that have been determined to be of little or no safety significance. These proposed amendments would reduce the industry's reporting burden in event review and assessment.

Virginia Power supports the rulemaking as well as NRC's intention to eliminate requirements marginal to safety. The attached information is submitted for consideration in this rulemaking.

Very truly yours,


W. L. Stewart

Attachment

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ATTACHMENT

The following are specific comments on the proposed amendments to the regulations.

NRC Notification after State or Local Government is Contacted

The proposed rule change should be expanded to include a provision which removes NRC notification requirements when a state or local government branch is notified for an event that is not related to nuclear safety. This would reduce duplicative regulatory burden on licensees.

ESF Actuations Not Required to be Reported

As stated in the proposed revision, the Commission proposes to make additional relaxations to event reporting by excluding three additional categories of events. The third category listed excludes events from reporting requirements when an invalid actuation, isolation, or realignment of the reactor water clean-up or designated ventilation systems occurs. Invalid ESF actuations involving other (than the designated) systems would continue to be reportable.

We suggest that the third category of the proposed revision be expanded to exclude all invalid ESF actuations, isolations, or realignments with the exception of those that affect reactivity or involve starts of major safety-related components (e.g., emergency diesel generators, high head safety injection pumps, auxiliary feed pumps, etc.).

Invalid Signal Definition

The definition of an invalid signal should be simplified. The definition provided in the revision is lengthy and could result in an inappropriate interpretation of an invalid actuation signal.

Typographical Correction

The word "intentional" in the background section of the proposed rule change is incorrectly spelled as "international." This should be corrected before the rule change is finally published.