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James Shapaker
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COMMENTS ON PROPOSED REVISION TO 10 CFR CHAPTER I
REVIEW OF REACTOR LICENSEE REPORTING
REQUIREMENTS FR VOL 57, NO. 119.

Gentlemen:

In its Federal Register Notice dated June 19, 1992, the NRC issued a proposed rulemaking to seek comments in connection with a review of the reporting requirements for power reactor licensees appearing in Title 10 of the code of Federal Regulations (10 CFR), Chapter I - Nuclear Regulatory Commission, NRC Guidance Documents. These documents refer to those that interpret the reporting requirements contained in the regulations, and reporting requirements for power reactor licensees contained in license documents such as Technical Specifications. The NRC staff is reviewing these requirements and associated guidance to determine if some reporting requirements can be reduced or eliminated to relieve unnecessary burden placed on power reactor licensees without reducing the protection for public health and safety.

We strongly endorse the NUMARC comments provided separately to the NRC. Additional comments on specific regulations with reporting requirements considered marginal to safety are attached.

Very truly yours,


W. L. Stewart

Attachment

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Comments on Reporting Requirements Marginal to Safety

FSAR Site Information Update Frequency (10 CFR 50.71)

We suggest that site information such as environmental concerns and local population that is contained in the FSAR be updated every ten years instead of an annual or refueling basis requirement required by 10 CFR 50.71. This would be consistent with the national census.

Price Anderson Act (10 CFR 140.21)

The NRC requires that information regarding guarantees of payment of deferred premiums is submitted on an annual basis. We suggest that this reporting requirement be deleted. This information would be available to NRC inspectors if required.

Nuclear Liability Insurance Endorsements (10 CFR 140.15)

Pursuant to 10 CFR 140.15, licensees are required to provide proof of financial protection that consists of a copy of the liability policy (or policies) together with a certificate by the insurers issuing the policy stating that the copy is a true copy of the currently effective policy issued to the licensee. We suggest that this requirement also be deleted and that this information be available for inspection by the NRC.

10 CFR 50.59 Reports

In the August 31, 1992 Federal Register, the NRC consider the need for licensees to submit 10 CFR 50.59 reports concerning annual design change. The commenters noted the requirement for these reports was issued before the Final Safety Analysis Reports were required to be updated periodically and before resident inspectors were assigned to all reactor sites. The commenters also observed that these reports are now available on site for review by inspectors at any time and that most design changes are reflected in the FSARs and they did not believe that these reports are routinely reviewed by the NRC staff. The commenters believed that if the requirements to submit such a report were eliminated, there would be no impact on safety, the required evaluations could continue to be performed, and the reports would continue to be available for review. The NRC stated that the consequence of eliminating the requirements for these reports requires significant additional assessment. Thus, the proposed revisions have not been modified in order not to delay the benefit of burden reduction. Although this proposal will not be addressed in the current rulemaking, these suggested revisions will be evaluated as part of an ongoing NRC effort. We suggest that this issue be reconsidered for elimination.

Proposed Increase of Event Reporting System

Draft Revision 1 to NUREG-1022, "Event Reporting Systems, 10 CFR §50.72 and §50.73, Clarification of NRC Systems and Guidelines for Reporting," would lower the reporting threshold for LERs. This significant increase in the number of LERs to be reported will result in additional costs to licensees and NRC alike, while providing no additional safety benefits.

Draft Revision 1 to NUREG-1022 is marginal to safety and should be rescinded.