

# PUBLIC SUBMISSION

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**Docket:** NRC-2020-0036  
Reporting Requirements for Non-Emergency Events

**Comment On:** NRC-2020-0036-0008  
Reporting Requirements for Nonemergency Events at Nuclear Power Plants

**Document:** NRC-2020-0036-DRAFT-0014  
Comment on FR Doc # 2022-27979

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## Submitter Information

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**Organization:** Entergy

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## General Comment

See attached file(s)

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## Attachments

Entergy Comments on 50 72 Rulemaking

CNRO2023-00005

10 CFR 50.72

January 25, 2023

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

*Submitted via Regulations.gov*

Subject: Entergy Comments on the Regulatory Basis for Reporting Requirements for Nonemergency Events at Nuclear Power Plants (Docket ID: NRC-2020-0036)

Entergy Operations, Inc. (Entergy) appreciates the opportunity to comment on the regulatory basis for reporting requirements for nonemergency events at nuclear power plants (ML22108A004). Entergy agrees with the comments on the regulatory basis provided by the Nuclear Energy Institute. In addition, the following additional comments are provided for consideration:

- Entergy encourages the staff to continue to explore ways that the reporting requirements that are not proposed for elimination in this regulatory basis could eventually be eliminated at some point in the future.
- Regarding the estimated burden hours for each reporting requirement, Entergy appreciates that the staff assumed higher estimated burden hours than that assumed in NRC Form 361. Generally speaking, any potentially reportable event under 10 CFR 50.72 can involve several individuals from the utility site and, where applicable, corporate organizations in order to appropriately challenge the initial determination on whether the event in question was reportable or not. Many person-hours can be expended in these efforts, even when the event itself is determined not to be reportable. For those events that the licensee has determined to be reportable, additional person-hours, beyond the initial challenge of reportability determination, are often needed in order to develop, review and approve of the wording of the event report itself.

Entergy commends the staff's efforts in publishing a thorough, well-prepared regulatory basis and are encouraged by the proposed changes that would enhance the safety focus of NRC's reporting requirements.

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If you have any questions or require additional information, please contact me at 601-368-5102 or [PCoutur@Entergy.com](mailto:PCoutur@Entergy.com).

Respectfully,

Phil Couture

PC/chm