

SUNSI Review Complete
Template=ADM-013
E-RIDS=ADM-03
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Benney, Mary Neely

As of: 6/20/24, 4:21 PM
Received: June 17, 2024
Status: Pending_Post
Tracking No. lxj-2lyf-id8w
Comments Due: June 17, 2024
Submission Type: Web

PUBLIC SUBMISSION

Comment (2)
Publication Date:4/17/2024
Citation: 89 FR 27463

Docket: NRC-2024-0037
Event Reporting Guidelines

Comment On: NRC-2024-0037-0001
Draft NUREG: Event Report Guidelines

Document: NRC-2024-0037-DRAFT-0003
Comment on FR Doc # 2024-08179

Submitter Information

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General Comment

See attached file(s)

Attachments

06-14-24_NRC Industry Comments on NUREG-1022 Rev 3 Supplement 2

June 14, 2024

Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

Subject: NEI Comments on Draft NUREG-1022, Revision 3, Supplement 2, “Event Report Guidelines,”
Docket ID NRC-2024-0037

Submitted via Regulations.gov

Project Number: 689

Dear Program Management, Announcements and Editing Staff:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, appreciates the opportunity to comment on the draft NUREG-1022, Revision 3, Supplement 2, “Event Report Guidelines” (Docket ID NRC-2024-0037), which provides licensees updated guidance for evaluating and reporting degraded or unanalyzed conditions.

In general, NEI supports the staff’s proposed changes to the guidance for reporting degraded or unanalyzed conditions that significantly degrade plant safety. Defining “discovery” and including considerations for structures, systems, and components (SSCs) recategorized under 10 CFR 50.69 should result in fewer event report retractions and minimize the burden on licensees and NRC staff.

However, NEI recommends additional discussion on the use of risk insights for determining if a condition significantly degrades plant safety. The discussion regarding Risk-Informed Safety Class (RISC)-3 and RISC-4 SSCs provides the licensee one method to use risk insights and probabilistic risk assessment

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI’s members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

(PRA) in evaluating applicable reporting requirements. However, this approach can only be used for licensees with an approved 50.69 program, and for SSCs that have been categorized under 50.69. Licensees should also be given the option to use their PRA models to provide insight regarding whether or not a condition significantly degrades plant safety. NEI recommends including additional allowances for licensees to use existing risk insights to determine if a condition “significantly degrades plant safety.”

Additional NEI comments are in the attached table. NEI appreciates the NRC’s effort in developing this draft guidance and considering these comments. We encourage timely issuance of the supplement.

If you have questions concerning this letter, please contact me at mab@nei.org or 202.739.8087.

Respectfully,



Tony Brown
Technical Advisor, Regulatory Affairs

Attachment: NEI Comment Table on Draft NUREG-1022, Revision 3, Supplement 2, “Event Report Guidelines”

c: Michael King, NRC/NRR
Lisa Regner, NRC/NRR/DRO/IOEB
Paul LaFlamme, NRC/NRR/DRO/IOEB

NEI Comments on Draft NUREG-1022, Revision 3, Supplement 2, “Event Report Guidelines”

Affected Section	Comment/Basis	Recommendation
1. GENERAL	Recommend additional discussion be included on the use of risk insights for determining if a condition significantly degrades plant safety. The discussion regarding Risk-Informed Safety Class (RISC)-3 and RISC-4 SSCs provides the licensee one method to use PRA and risk insights in evaluating applicable reporting requirements. However, this approach can only be used for licensees with an approved 50.69 program, and for SSCs that have been categorized under 50.69. Licensees should also be given the option to use their detailed PRA models to provide insight regarding whether or not a condition significantly degrades plant safety.	Recommend including additional allowances for licensees to use existing risk insights to determine if a condition “significantly degrades plant safety.”
2. Section 2.1, second bullet of 2 nd paragraph	Clarify that the moment of discovery occurs when the evaluation is completed.	<p>Proposed language:</p> <ul style="list-style-type: none"> if the existence of a seriously degraded principal safety barrier or unanalyzed condition that significantly degrades plant safety cannot be readily determined when it occurs or when it is found to have occurred, and additional evaluation is needed, then the moment when the evaluation that supports the existence of such a condition is completed.

Affected Section	Comment/Basis	Recommendation
3. Section 2.2.A, last paragraph	The paragraph is specifically associated with Example #3 and should be moved to the example to ensure consistent application.	<p>Proposed language:</p> <p>3. degradation of steam generator tubes that is deemed serious if the tubes fail to meet the performance criteria outlined in the plant-specific technical specifications (TS) for steam generator tube integrity. When one or more steam generator tubes meet the tube repair criteria and have not been plugged or repaired in accordance with the steam generator program, they are not considered to be severely degraded as long as structural integrity and the accident-induced leakage performance criteria in the plant-specific TSs are met.</p>
4. Section 2.2.B, Example #5	Recommend clarifying that functionally related components implies components from different systems. Also recommend replacing “could” with “would” to avoid any confusion or ambiguity when evaluating if a condition significantly degrades plant safety.	<p>Proposed language:</p> <p>5. Multiple functionally related safety-related components (i.e. components in different systems) out of service that would prevent the fulfillment of a safety function.</p>
5. Section 2.2.1, Example #4	Recommend providing an example of a condition that is normal and expected wear or degradation.	<p>Proposed language:</p> <p>(4) Additional Clarification for Events Not Required to Be Reported</p> <p>Licensees are not required to report an event pursuant to this criterion if the event results from a shared dependency among trains or channels that is a natural or expected consequence of the approved plant design, or normal and expected wear or degradation. For example, run to failure components would be considered normal and expected wear or degradation.</p>