



NUCLEAR ENERGY INSTITUTE

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August 10, 2000

Mr. Glenn M. Tracy, Chief
Operator Licensing, Human Performance and
Plant Support Branch
U.S. Nuclear Regulatory Commission
Mail Stop O-6 D17
Washington, DC 20555-0001

Project Number: 689

Dear Mr. Tracy:

In a public meeting on July 12, 2000, the NRC staff discussed criteria for crediting operator actions expected in response to a contingency event. The industry was asked to address this issue in more detail in the Safeguards Performance Assessment Program.

To properly address the issue, operator actions need to be considered in two distinct areas: credit for operator actions specified in the contingency response plan and evaluation of operator mitigating action taken during a drill or exercise. NEI 99-07, *Safeguard Performance Assessment Program*, would be modified in two places addressing these two issues.

To take credit for operator actions in the contingency response plan, there should be a reasonable expectation that the operators could execute their portion of the strategy. Examples include shutting down the plant on a confirmed intrusion, and operators moving from the control room to the secondary control station. These actions should be supported by approved procedures, training, necessary equipment, and sufficient time available to implement the actions.

At the end of Section 8, Protective Strategy, add:

"Any operator action, such as shutting down the plant or manning the secondary control station, included in the protective strategy should be reasonably achievable. This would include approved procedures, operator training, and sufficient time to complete the action. Any equipment necessary to complete these actions should be available and ready for use in the time required to mitigate the damage."

erids: Kelly Grimes
DO46

*Rec'd from Kelly Grimes
at DES on 8/31/00*

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During an actual event, operators would be expected to respond to indications of equipment derangement. The response would be consistent with any other type of initiating event and is a fundamental element of emergency procedures and training programs. In a security drill, most operator actions must be simulated. In evaluating a drill, operator actions need to be carefully evaluated to ensure they could be executed under the postulated conditions.

In evaluating operator actions, it must be determined whether the action could reasonably be accomplished in the time available and under the conditions postulated during the drill. A prescriptive list of items to consider is not consistent with the mitigating actions available to the operators in an actual event.

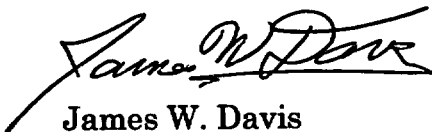
After the second paragraph in Section 9.5, add:

"Since operator actions are normally simulated during a drill, careful evaluation must be conducted to ensure actions credited for mitigation or recovery are achievable under the postulated scenario conditions. Items to consider include:

- the time available to take the action;
- procedures that are available;
- operator experience and training;
- availability of needed equipment; and
- environmental conditions where the action is to be taken, including any unconstrained adversary activity."

If you have any questions on this proposal please call me at 202-739-8105.

Sincerely,



James W. Davis

c: NEI Security Working Group