

**From:** James Bongarra *NAR*  
**To:** jjp2; Lewis, Paul *RES*  
**Date:** 1/15/03 2:39PM  
**Subject:** Per D. Diec's 1/14/03 meeting summary request

J/Paul:

Attached are some words that I am proposing to add to the rulemaking package acknowledging other activities re: manual actions. I am suggesting that these paragraphs be added to the section titled, "Use of Standards," third from the last page of the rulemaking attachment. I also think someone from RES REAHFB should be cited as part of the "Key Staff." What say you to these suggestions? Any additional thoughts/comments??

Jim

*D/41*

In addition, the staff considered the guidance on manual actions contained in ANSI/ANS Standard 58.8 (1994), "Time Response Design Criteria for Safety-Related Operator Actions." This standard contains criteria that establish timing requirements for use in the design of safety-related systems for nuclear power plants. The criteria are used to determine whether safety-related systems can be initiated by operator action or require automation. The standard's scope "is limited to safety-related operator actions associated with design basis events (DBEs) that result in a reactor trip and are required to be analyzed in safety analysis reports (SARs)." The criteria provide a basis for requirements to determine whether a particular action needed to initiate or control a safety-related system can be accomplished by manual action or must be automated. The staff considers this industry consensus standard relevant to the proposed rulemaking but not as a replacement for it. The standard's expressed focus is on the design of safety-related equipment and DBEs. In the staff's opinion, application of this standard to address fire protection manual actions is outside the intent and scope of the standard. However, the principles and methods contained in the standard may be adaptable to the proposed rulemaking and will be considered as part of the staff's effort to develop generic manual action acceptance criteria.

The staff is also aware of NRC draft guidance to review license amendments that contain risk-important human actions. The staff issued NUREG-1764, "Guidance for the Review of Changes to Human Actions" as a draft report for public comment together with revising SRP Chapter 18, "Human Factors Engineering." This NUREG proposes a risk-informed methodology for the staff to use in their review of the human performance aspects of proposed changes to plant systems and operations that are submitted to the staff as licensee amendment requests. In addition to using risk insights to determine the level of regulatory review that the staff should perform on licensee submittals containing human actions, the NUREG provides deterministic review criteria for evaluating the acceptability of human actions proposed by licensees. The staff will consider the viability of using the deterministic review criteria during the rulemaking process.