8/4/04 69FR H1187

RDB. received 9/0/04

From:

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To:

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Date:

Tue, Aug 31, 2004 2:55 PM

Subject:

Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Thomas Hook (tom_hook@dom.com) on Tuesday, August 31, 2004 at 14:55:06

Document_Title: Good Practices for Implementing Human Reliability Analysis (HRA)

Comments: Comments:

- 1. Section 5.3.3.6: The good practice suggests that the total combined probability of all HFEs in the same accident sequence not be lower than 1E-05. HFEs associated with initiating event fault trees should not be included in this combination due to their general lack of correlation with other post-event human actions.
- 2. Section 5.4.3.1: The definition of recovery action is not clear and footnote #1 on page 53 is missing. Need to clear indicate difference between post-initiator human failures and recovery actions, and how this difference impacts the quantification. Recommend that recovery actions be defined as alarm driven actions and post-initiator actions be defined as procedure driven actions (not driven by alarm).

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