

NRCREP - NUREG-1842 Comments

From: "Harold Stiles" <HSTILES@nc.rr.com>
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Subject: NUREG-1842 Comments
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Serial: PE&RAS-06-046
May 16, 2006

Mr. Michael T. Lesar, Chief
Rules and Directives Branch
Office of Administration
United States Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

SUBJECT: Comments on NUREG-1842, "Evaluation of Human Reliability Analysis Methods Against Good Practices, Draft Report for Comment" (71 FR 19912)

Dear Mr. Lesar:

The letter provides comments as requested in the Federal Register (71 FR 19912) published on April 18, 2006 concerning NUREG-1842, "Evaluation of Human Reliability Analysis Methods Against Good Practices, Draft Report for Comment" (ML060960216).

Progress Energy supports the effort to address quality issues related to Human Reliability Analysis (HRA) in regulatory applications and to develop HRA guidance to support the implementation of Regulatory Guide 1.200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities." Consequently, Progress Energy suggests that NUREG-1842 should reflect more recent improvements the industry has made in reducing operator errors and should endorse the optional use of site-specific data for determining the probability for operator pre-initiator events.

In particular, NUREG-1842 seems to favor either the Accident Sequence Evaluation Program (ASEP) or the Technique for Human Error Rate Prediction (THERP) over other methods for evaluating potential operator pre-initiator events, although neither of these methods includes the effort the industry has made to reduce operator errors, such as failure to restore equipment lineups following testing or maintenance or instrumentation calibrating activities. ASEP and THERP were published in middle 1980s, (1983 and 1987) with the underlining research done even earlier. Since the middle 1990s, INPO and the industry have made operator error reduction a primary goal, including an increased emphasis on identifying errors at the various sites to identify the causes and eliminate or reduce them. On the prevention side, various tools, such as "STAR" (Stop, Think, Act, Review) and extensive use of pre-job briefs, have been developed and used to reduce the operator error rate.

Additionally, electronic databases exist both for the corrective action program and for the tagging systems and, in some cases, for post-outage system lineups. From such databases, both the number of demands for a pre-initiator error and the number of failures can be determined for each site. This should yield a site-specific, pre-initiator error rate with statically significant demands and failures.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

 HAROLD A. STILES

 Brian McCabe
Supervisor - Regulatory Affairs

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