

**NEI Tier 2 star:**

In the second part of the two-part Development Process, listed under “Minimum Inventory Development Process and Acceptance Criteria”, in the proposed Draft ISG “Minimum Inventory of Human System Interfaces (Alarms, Controls, and Displays)”, the Staff have proposed that the following be provided as Tier 2\* information:

- the alarms, controls, and displays required to accomplish each of the GTG steps,
- the GTGs and supporting documentation, and
- a list of alarms, controls, displays

Industry does not agree with this requirement because we already have in place processes that will ensure that applicants will do more than enough to comply with the “approved process” agreement, and that the NRC Staff may selectively audit or inspect all or part of any of these processes, procedures and plans.

NEI instead recommends that these three items be provided as Tier 2 information.

In support of this recommendation, industry draws attention to the fact that Tier 1 Design Commitments (DC) and their associated Design Acceptance Criteria (DAC) contained in the Human Factors Engineering - Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) are given as needed to address elements of NUREG-0711 that are not complete at the time of COL application.

The key concern is that, by making GTGs and the associated list of alarms, controls, and displays a Tier 2\* commitment, the iterative nature of the NUREG-0711 design process is unnecessarily impeded. The applicant’s ability to refine and complete the design requires execution of corresponding processes specified in Tier 1 and in other licensing commitments (e.g., the applicant’s procedure development program). The proposed Tier 2\* commitment would add unnecessary burden and slow the execution of these processes.

In an FSAR Chapter 18 Appendix the information requested by the NRC will be presented, as it becomes available. The tables in the Appendix will be updated as the designs are finalized, and the HFE Program elements are completed. This Appendix, and the tables in it, will have titles like:

- Chapter 18 Appendix, Emergency Operation Information and Controls,
- Table 1, Inventory of Controls Based Upon the GTGs and PRA, Fixed Position Controls and Other Control Functions
- Table 2, Inventory of Displays Based Upon the GTGs and PRA, Fixed Position Displays and Other Displays
- Table 3, Inventory of Alarms Based Upon the GTGs and PRA, Fixed Position Alarms and Other Alarms

The NRC may at any time chose to audit and inspect any part of the associated plans and documents.

In conclusion, NEI asserts that the NRC Staff have adequate checks and balances in place to obviate the need for this Minimum Inventory information to be categorized as Tier 2\*.

NEI has no objection to this information being categorized as Tier 2 information.