

**Response to Public Comments for Draft Regulatory Guide DG-1194,
“Guidance to Operators at the Controls and to
Senior Operators in the Control Room of a Nuclear Power Unit”
Proposed Revision 3 of Regulatory Guide (RG) 1.114**

A notice that Draft Regulatory Guide DG-1194 (proposed Revision 3 to Regulatory Guide 1.114) was available for public comment was published in the *Federal Register* (72 FR 18584) on Friday, April 4, 2008. Comments were received from the organizations identified below. The NRC has combined these comments into a single report and provides staff disposition in the following table.

Comments were received from:

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With respect to the new plants control rooms – can it be inferred that words controls, instrumentation, etc. will be considered in the same context as our current control rooms? As you know there will be no real hard controls or instrumentation or annunciators as we have now.	Yes. Controls in the Control Room will be the same context as in current control rooms. See 10 CFR 50.2, “Definitions,” and 10 CFR 55.4, “Definitions,” for the term “controls.” No change to the Draft Guide is required.
The design of the AP1000 control room includes rest room facilities and a kitchen at the back of the control room.	No. They cannot take a break without getting relief. The current practice remains in effect. See regulatory positions 1.2, 2.2, and 2.3.
The words in the guide require that the SRO either – be in range to hear the alarms or the RO. Can they take a short personal break without having to get relief from another SRO?	No change to the Draft Guide is required.
2.3 The senior operator should have the flexibility to move periodically for a brief time to other parts of the control room, as long as the senior operator is at all times within the control room vital area and meets either of the following conditions. a. The senior operator is in sight of or in the audible range of the reactor operator at the controls. b. The senior operator is in the audible range of the control room annunciators.	No. 10 CFR 50.54(m)(2)(iii) states: “When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, for each fueled nuclear power unit, a licensed operator or senior operator shall be present at the controls at all times.”
2.4 Administrative procedures should be	

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<p>established that define and outline (preferably with sketches) the specific area within the control room (Section 2.2, above) where the senior operator normally should remain while performing designated duties.</p> <p>Items (2.3 and 2.4): Duke believes the senior operator maintaining contact with reactor operators in the horseshoe via an open phone line while in a restroom/break area within the control room vital area would be another acceptable alternative.</p>	<p>No change to the Draft Guide is required.</p>