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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: UniStar Nuclear Energy, NRC Docket No. 52-016
Response to Request for Additional Information for the
Calvert Cliffs Nuclear Power Plant, Unit 3,
RAI No. 33, Revision 0, Question 18-1, Human Factors Engineering

References: 1) John Rycyna (NRC) to George Wrobel (UniStar), "RAI No. 33 COLP
1431.doc" email dated November 20, 2008

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC e-mail correspondence to UniStar Nuclear, dated November 20, 2008 (Reference 1). This RAI addresses Human Factors Engineering, as discussed in Section 18.12 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the CCNPP Unit 3 Combined License Application (COLA), Revision 3.

The enclosure provides our response to RAI No. 33, Revision 0, Question 18-1. COLA impacts associated with this RAI response are noted with the question response. A Licensing Basis Document Change Request has been initiated to incorporate these changes into a future revision of the COLA. Our response to Question 18-1 does not include any new regulatory commitments.

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If there are any questions regarding this transmittal, please contact me at (410) 470-4205, or Mr. Michael J. Yox at (410) 495-2436.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 20, 2009



Greg Gibson

Enclosure: Response to NRC Request for Additional Information, RAI No. 33, Revision 0,
Question 18-1 - Human Factors Engineering, Calvert Cliffs Nuclear Power Plant
Unit 3

cc: John Rycyna, NRC Project Manager, U.S. EPR COL Application
Thomas Fredrichs, NRC Environmental Project Manager, U.S. EPR COL Application
Getachew Tesfaye, NRC Project Manager, U.S. EPR DC Application (w/o enclosure)
Loren Plisco, Deputy Regional Administrator, NRC Region II (w/o enclosure)
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U.S. NRC Region I Office

Enclosure

**Response to NRC Request for Additional Information
RAI No. 33, Revision 0, Question 18-1 - Human Factors Engineering
Calvert Cliffs Nuclear Power Plant Unit 3**

RAI No. 33, Revision 0

Question 18-1

Section 18.12 of the applicant's FSAR, "Human Performance Monitoring," states that "[t]his section of the U.S. EPR FSAR is incorporated by reference with the following supplements. ... {Constellation Generating Group} and UniStar Nuclear Operating Services shall implement a Human Performance Monitoring (HPM) Program similar to the one described in Section 18.12 of the U.S. EPR FSAR."

Please explain what is meant by a "similar program" and submit the specific details of the program.

Response

The specific details of the CCNPP Unit 3 Human Performance Monitoring Program are represented in the COLA Impact Section. This program was developed from, and is similar to, the program in Section 18.12 of the U.S. EPR FSAR.

COLA Impact

Part 2, Final Safety Analyses Report (FSAR) of the CCNPP Unit 3 COLA will be updated in a future COLA revision to incorporate the changes to FSAR Section 18.12 that are identified below:

18.12 Human Performance Monitoring

~~This section of the U.S. EPR FSAR is incorporated by reference with the following supplements.~~

The U.S. EPR FSAR includes the following COL Item in Section 18.12:

A COL applicant that references the U.S. EPR design certification will implement an HPM program similar to that which is described in this section.

This COL Item is addressed as follows:

~~{Constellation Generating Group and UniStar Nuclear Operating Services} shall implement a Human Performance Monitoring (HPM) Program similar to the one described in Section 18.12 of the U.S. EPR FSAR. The U.S. EPR conceptual Human Performance Monitoring description is replaced with site-specific information as follows:~~

Monitoring human performance is performed throughout the life of the plant so that:

- : The results of the integrated system validation are maintained.
- : Operator performance does not degrade over time.

- Issues discovered by operating and maintenance personnel are noted, tracked, and corrected before plant safety is compromised.
- Changes made to the design do not result in a degradation of human performance.

18.12.1 Objectives and Scope

The objectives for HPM are:

- To confirm that the design can be effectively used by personnel.
- To confirm that human actions (HA) are accomplished within an acceptable time and meet performance criteria.
- To confirm that design changes do not adversely affect personnel performance.
- To confirm that the acceptable level of performance established during the integrated system validation remains valid.

To verify that the objectives are met, HPM is conducted in areas of the plant requiring HAs, including:

- MCR.
- RSS.
- TSC.
- LCSs important to plant safety.

Operation, testing, and maintenance actions during each plant mode are also monitored for human performance.

The HPM program establishes the requirements and interfaces for continuous improvement of human performance. The goal of the program is to reduce human errors that lead to plant events by promoting fundamental behaviors that support safe, reliable, and event free operation by:

- Establishing a strategic approach and expectations to improving human performance.
- Establishing processes to maintain and improve human performance.
- Promote behaviors to identify and eliminate error-likely situations.

The program elements include:

- : Identification, evaluation, and performance of risk-significant activities using appropriate human performance tools.
- : Provision of human performance tools to site personnel and promoting their use through training and procedures.
- : Provision of a variety of defense-in-depth measures (such as pre-job briefs, just-in-time training, contingency planning, etc.) to reduce the probability of error and mitigate its effects should an error occur.
- : The use of subordinate and peer coaching to reinforce desired behaviors.
- : Assessment and trending of human performance through the use of field observations and assessments.
- : Provision of feedback on suggestions for improvement.

18.12.2 **Methodology**

HPM is performed by observing personnel activities (i.e., during training and operation), interviews, self-initiated feedback, and walkthroughs. The use of a corrective action program combined with tracking issues allows design errors, design issues, operator workarounds, operator burdens, or inefficiencies to be captured and addressed. Programs such as the design change control process, operator focus index, performance indicators, and corrective action program are in place to prevent degradation of human performance. The combination of these tools creates a strategy that meets the intent of HPM as described in NUREG-0711 (NRC, 2004).

18.12.2.1 **Corrective Action Program and Issue Tracking**

The UniStar Nuclear Quality Assurance Program Description (UNE, 2007) describes the corrective action program used so that issues are documented, reviewed, addressed, tracked, and trended.

Plant personnel are encouraged to report errors, deficiencies, workarounds, and design inefficiencies, to ensure that issues are captured. Personnel performing evaluations of recommended dispositions shall have demonstrated competence in the specific area they are evaluating, have an adequate understanding of the requirements, and have access to pertinent background information.

For significant conditions adverse to quality, the cause of the condition is determined and corrective action taken to preclude recurrence. The identification, cause, and corrective action for significant conditions adverse to quality is documented and reported to appropriate levels of management. Follow-up action is taken to verify implementation of the corrective action.

Trend evaluation is performed in a manner and at a frequency that provides for prompt identification of adverse quality trends. Identified adverse trends are

handled in accordance with the corrective action program described in the UniStar Nuclear Quality Assurance Program (UNE, 2007), and reported to the appropriate level of management.

Industry and self-identified operating experience results contribute to enhancing human performance and preventing potential reduction in human performance. Self-identified human performance operating experience will be documented, reviewed, addressed, tracked, and trended through the corrective action program. The industry operating experience issues are screened for human performance and analyzed for applicability to CCNPP Unit 3. Preventive measures are taken for those issues that could potentially adversely impact human performance.

18.12.2.2 **Monitoring and Trending**

HAs and the level of performance are monitored during simulator-training and during actual plant conditions, when feasible. The data from monitoring is evaluated and the results are entered into the corrective action program for analysis and trending. The results of the trends are used to monitor for any change, positive and negative, in human performance. If the trend shows that performance has degraded, corrective actions are performed.

Risk-significant HAs are monitored more frequently so that degradation of safety-related performance is corrected before the safety of the plant is compromised.

18.12.2.3 **Plant Operation**

User activities are observed during simulator training and periodically during actual plant operation. The licensed operator training program allows monitoring of human performance and trending. Operator actions during training provide insight to potential operator workarounds, operator errors, and design inefficiencies. HAs are monitored for agreement with established time and performance criteria. These established performance measures are used as the baseline to determine changes in efficiency of user actions or their ability to perform tasks in a timely manner. Changes, along with any discovered design errors and decline in performance, are entered into the corrective action program to be analyzed for possible areas of improvement and used as input into human performance trending.

Other activities, such as communication between the control room and other areas of the plant, are also included in HPM and trending. Any inefficiencies, design errors, or failures noted by personnel are entered into the corrective action program and analyzed for possible areas of improvement and input to human performance trending.

18.12.2.4 **Design Change**

Before a design change that has a significant impact on FRA, FA, TA, HSIs, procedures, or training is implemented in the plant, the change is typically modeled on the simulator. Human performance is monitored using applicable scenarios developed during operational condition sampling and used during the

integrated system validation (see Section 18.10). These scenarios are limited to only those that use tasks affected by the design change to allow analysis of performance efficiency, degradation, or improvement. During simulation, user actions are observed for their efficiency and ability to perform tasks with the new design. The results are verified against the existing trend of human performance to determine if the performance was degraded by the design change.

Any degradation in performance resulting from the design change is entered into the corrective action program to be analyzed for possible areas of improvement and used as input to human performance trending. Significant impacts to human performance require that the design change be modified. If no degradation in performance is observed, the design is implemented and results of the HPM are entered into the current trend.

Operational feedback is used to validate that the design is implemented and is operating as expected.

18.12.2.5 **Operation Focus Index**

An operational focus index is used to trend performance of operator's day to day activities. Indicators are used to exhibit the level of performance and risk associated with different operational activities.

Adverse trends are entered into the corrective action program. Further analysis may be required to understand the adverse trend and identify effective corrective actions.

18.12.2.6 **Probabilistic Risk Assessment**

Probabilistic risk assessment (PRA) models are used when plant or personnel performance can not be simulated, monitored, or measured. Performance data from modeled risk-significant HAs are used to evaluate the risk of the proposed design change on human performance during different operation modes. UniStar Nuclear Operating Services maintains the PRA model. After a design change, the PRA model is updated to reflect the new design.

18.12.2.7 **Overall Design Control Process**

A design control process described in Section 5 of the Human Factors Topical Report (AREVA, 2007) controls the design, design changes, design verification, and analysis activities. The process confirms that changes made to the design are adequate and accomplish the goal of the design change. The process also confirms that the design change does not result in adverse effects on personnel performance.

A substantial HSI design change is simulated on the simulator where practicable. Evaluation of human performance determines the anticipated impact of the design change, verifies that the performance level has been maintained, and verifies that the design change can be effectively used by personnel. If the

design change demonstrates performance enhancements and does not show an adverse impact, it may be implemented into the plant.

18.12.3 **Results Summary**

HPM is continued throughout the life of the plant. Reports summarizing human performance-related issues, resolution of those issues, implementation status, and operating experience results are maintained for trending purposes. Operating conditions determine the necessary frequency of these summary reports.

UniStar Nuclear Operating Services shall maintain an HPM program which meets the intent given in this section. Documentation of HPM summarizes the following:

- : Baseline human performance criteria established during V&V.
- : HPM implementation strategy.
- : Any trends in human performance.
- : Operator focus index.
- : Human performance-related issues, resolution, implementation status, and operating results.
- : Specific human performance issues that can be applied to the standard U.S. EPR plant.

18.12.4 **References**

NRC, 2004 NUREG-0711, "Human Factors Engineering Program Review Model." 2004.

AREVA, 2007 Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), Request for Review and Approval of ANP-10279, Revision 0, "U.S. EPR Human Factors Engineering Program," NRC:07:004, January 23, 2007.

UNE, 2007 "UniStar Nuclear, NRC Project No. 746, Submittal of the Published UniStar Topical Report No. UN-TR-06-001-A, 'Quality Assurance Program Description,' Revision 0", UniStar Nuclear, April 9, 2007.

Part 10, Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and ITAAC Closure of the CCNPP Unit 3 COLA will be updated in a future COLA revision to incorporate the changes to FSAR Section 18.12 that are identified below:

COL Item 18.12-1 in Section 18.12

Prior to initial fuel load, Calvert Cliffs 3 Nuclear Project and UniStar Nuclear Operating Services shall implement a Human Performance Monitoring Program ~~similar~~ consistent to the one described in FSAR Section 18.12 of the U.S. EPR FSAR.