REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8409250370 DOC.DATE: 84/09/20 NOTARIZED: NO DOCKET #
FACIL:50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Servic 05000305
AUTH.NAME AUTHOR AFFILIATION
HINTZ,D.C. Wisconsin Public Service Corp.
RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Requests extension until June 1985 to complete detailed control room design review summary rept per Suppl 1 to NUREG-0737 re review of man-machine interface in nuclear power plant control room,per listed NUREG-0737 items.

DISTRIBUTION CODE: A003D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 3
TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

NOTES: 05000305
OL:12/21/73

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	NRR ORB1 BC	7	7			
INTERNAL:	ADM/LFMB	1	0	IE/DEPER/EPB	3	3
	NRR PAULSON,W	1	1	NRR/DHFS/HFEB	5	5
	NRR/DHFS/PSRB	1	1	NRR/DL/ORAB	1	1
	NRR/DL/ORB5	5	5	NRR/DSI/CPB	1	1
	NRR/DSI/ICSB	1	1	NRR/DSI/METB	1	1
	NRR/DSI/RAB	1	1	NRR/DSI/RSB	1	1
	REG FILE	1	1	RGN3	1	1
	RGN2/DRSS/EPRPB	1	1			
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1	NTIS	1	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 36 ENCL ~~35~~ 0

NRC-84-157

WISCONSIN PUBLIC SERVICE CORPORATION

P.O. Box 1200, Green Bay, Wisconsin 54305

September 20, 1984

Director, Office of Nuclear Reactor Regulation
Attention: Mr. D. G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
TAC #51170
DCRDR Summary Report Schedule Change

References:
1) Letter from D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating Licenses, and Holders of Construction Permits dated December 17, 1982.
2) Letter from C. W. Giesler to D. G. Eisenhut dated April 15, 1983
3) Letter from S. A. Varga to C. W. Giesler dated June 12, 1984
4) Letter from D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating Licenses, and Holders of Construction Permits dated June 3, 1983

Your letter entitled "Supplement 1 to NUREG-0737-Requirements for Emergency Response Capability" (Reference 1), provides additional guidance on several related NUREG-0737 Task Action Items. Guidance was provided in the Supplement 1 letter to clarify the requirements for Item I.D.1, Detailed Control Room Design Review.

Item I.D.1 of NUREG-0737 requires licensees to perform a Detailed Control Room Design Review which includes a human factors review of the man-machine interface present in a nuclear power plant control room.

As suggested in the Supplement 1 letter we coordinated several task action item projects such that an integrated response plan could be developed. We worked

8409250370 840920
PDR ADOCK 05000305
F PDR

A003
1/0

closely with our NRC Project Manager to develop an implementation schedule for the following NUREG-0737 items:

I.C.1 Guidance for the Evaluation and Development of Procedures for Transients and Accidents

I.D.1 Control Room Design Reviews

I.D.2 Plant Safety Parameter Display Console

III.A.1.2 Upgrade Emergency Support Facilities

III.A.2.2 Meteorological Data

In our letter dated April 15, 1983 (reference 2) we provided a schedule for completion of each item of this integrated emergency response program.

Your letter dated June 12, 1984 (reference 3) included as an enclosure an Order Confirming Licensees Commitments on Emergency Response Capability. The two items of particular interest are the Detailed Control Room Design Review (DCRDR) and Regulatory Guide 1.97 - Application to Emergency Response Facilities.

The requirements for the DCRDR include submittal of a program plan and a summary report to the NRC including a proposed schedule for implementation of proposed modifications. The program plan was submitted on April 15, 1983 as an attachment to reference 2. The Summary Report was scheduled to be submitted in November 1984.

An integral part of the DCRDR was the performance of a System Review and Task Analysis (SRTA) to both verify the availability of necessary instrumentation and also validate that instrumentation is located such that the probability for human error is lessened. The SRTA is performed by using plant specific Emergency Operating Procedures (EOPs) and the plant specific simulator. A walkthrough of procedures on the simulator control board provides information which is evaluated based on human engineering acceptance criteria (i.e. traffic flow diagrams).

During the development of our proposed implementation schedule, the Summary Report for the DCRDR was anticipated to be complete by November 1984. As mentioned above, the development of the plant specific Emergency Operating Procedures (EOPs) is a necessary element of the DCRDR process. Due to several unanticipated changes in the EOP development program a delay is necessary in the preparation of the DCRDR Summary Report.

In early 1983 Wisconsin Public Service began a program to develop plant specific EOPs based on Revision 0 of the Westinghouse Emergency Response Guidelines (ERGs). We developed an integrated schedule, which included the DCRDR, based upon the estimated completion date of the plant specific procedures.

In reference 4 the NRC commented on the Revision 0 version of the ERG's. Westinghouse reviewed these comments and revised the original guideline set to address the NRC concerns. This new and significantly revised set of ERG's was issued as Revision 1 in November 1983.

In addition to the rewrite of the ERG's, Westinghouse also developed additional background documentation for each guideline. The background documentation provides additional clarifying information on each guideline step. The background documents will be used as an aid in the operator training program.

The plant specific EOPs based on Revision 1 of the ERG's, are now complete in a draft form. These procedures are receiving internal review and comment. We plan to have a set of procedures released as "approved for training" prior to the operator requalification program scheduled to start in late 1984. Since the validation phase is one method of identifying potential human engineering discrepancies we feel a complete DCRDR Summary Report cannot be prepared until the completion of the validation effort. We have made every effort to modify and reschedule our DCRDR program to coordinate with the EOP development program, however, the unanticipated changes in the Westinghouse ERG program (i.e. development of Revision 1) were beyond our control. We therefore request an extension of the November 1984 completion date stated in reference 2.

The DCRDR/EOP validation program is to be performed during the operator requalification training which is scheduled to be completed by our spring refueling outage. The DCRDR Summary Report will document any deficiencies identified during the validation process. We therefore propose that the DCRDR Summary Report originally scheduled for November 1984 be submitted instead in June 1985.

A commitment was made in reference 2 to also provide a discussion of how the requirements of Supplement 1 to NUREG-0737 have been or will be met in regards to Regulatory Guide 1.97 - Application to Emergency Response Facilities. The evaluation of control room instrumentation is an integral part of the DCRDR and will therefore be included in the DCRDR Summary Report submitted in June 1985.

In summary, we request that an extension be granted for completing the DCRDR Summary Report and the associated response to Regulatory Guide 1.97. We propose to submit the report in June 1985. We therefore request that the Order dated June 12, 1984 (reference 3) which identified November 1984 as the date that a DCRDR Summary Report and a Regulatory Guide 1.97 discussion would be submitted, be revised to indicate a completion date for these items of June 1985.

Very truly yours,

D. C. Hintz
Manager - Nuclear Power

DSN:jal

cc - Mr. S. A. Varga, US NRC
Mr. Robert Nelson, US NRC