

PUBLIC SUBMISSION

As of: 10/16/15 11:20 AM
Received: October 09, 2015
Status: Pending_Post
Tracking No. 1jz-8ll8-snss
Comments Due: October 09, 2015
Submission Type: Web

Docket: NRC-2015-0187
Human Factors Engineering

Comment On: NRC-2015-0187-0001
Human Factors Engineering; Draft Standard Review Plan Section for Comment

Document: NRC-2015-0187-DRAFT-0003
Comment on FR Doc # 2015-19585

②

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8/10/2015
80FR 47958

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General Comment

Please see attached letter.

Attachments

NL-15-1880

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
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October 8, 2015

NL-15-1880

Cindy Bladey
Office of Administration, Mail Stop O12-H08
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Comments on Changes to Chapter 18, "Human Factors Engineering,"
of the "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear
Power Plants: LWR Edition" (NUREG-0800)
(Docket ID NRC-2015-0187)

Dear Ms. Bladey:

Southern Nuclear Operating Company (SNC) hereby submits comments for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, SNC is providing comments on a proposed revision to Chapter 18, "Human Factors Engineering," of the NUREG 0800 Standard Review Plan, as noticed in the Federal Register (*Federal Register* Vol. 80, No. 153, 47958, dated August 10, 2015; Docket ID NRC-2015-0187).

SNC has reviewed the proposed changes to Chapter 18 and has the following comment on Section 18.0.5 (page 5 of 73 in the redline version). New language was added which would expand the scope beyond events included in the safety analysis report (SAR): "While HSI modernization may be a large-scale modification, even smaller-scale modifications may be risk-important, especially when they affect operator actions that are credited in the ~~safety analysis report (SAR)~~ SAR or other accidents of high or moderate frequency which may not be analyzed in the SAR." The discussion should remain focused on events discussed in the SAR. SNC recommends deleting this wording.

This letter makes no NRC commitments. If you have any questions or comments, please contact Doug McKinney at (205) 992-5982.

Respectfully submitted,

A handwritten signature in black ink that reads "C. R. Pierce". The signature is written in a cursive style with a large, prominent "P" at the end.

C. R. Pierce
Regulatory Affairs Director

CRP/DN/cbg

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
Mr. B. J. Adams, Vice President – Engineering
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