

D850718

Mr. William J. Dircks
Executive Director for Operations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Dircks:

SUBJECT: ACRS COMMENTS ON NUCLEAR POWER PLANT CONTROL ROOM HABITABILITY

During its 303rd meeting, July 11-13, 1985, the Advisory Committee on Reactor Safeguards met with the NRC Staff to discuss NUREG/CR-4191, "Survey of Licensee Control Room Habitability Practices". This was also the subject of a meeting of the ACRS Subcommittee on Air Systems which was held on June 17, 1985.

As a result of these discussions we offer the following comments:

1. Overall progress in addressing this issue has been good. We agree with the plans and recommendations of the NRC Staff.
2. The survey showed that newer control room systems are increasingly complex, with little or no demonstrable improvement in meeting the actual needs for control room habitability. Some of this may be a consequence of inappropriate application of Regulatory Guide 1.52, "Design, Testing, and Maintenance Criteria for Post Accident Engineered-Safety-Feature Atmospheric Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants." This demonstrates the need to reconsider and/or reaffirm General Design Criterion 19. In undertaking this task, care should be taken to assure that a systems approach is applied and that the applicable portions of the Standard Review Plan and/or Regulatory Guide 1.52 are revised. We previously recommended revision of Regulatory Guide 1.52 in our letter to you of December 18, 1984.
3. Because of the importance of the protection of operators during a nuclear power plant accident, and because these latest studies have shown that facilities previously thought to be acceptable may not be, we urge you to continue to support this work.

We would like to be kept informed as future developments on this subject take place.

Sincerely,

David A. Ward
Chairman

→