

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8406050309 DOC. DATE: 84/05/31 NOTARIZED: NO DOCKET #
 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
 AUTH. NAME AUTHOR AFFILIATION
 CURTIS, N.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Discusses detailed control room design review summary rept re resolution of 45 HEDS. Util provided sufficient commitment to improve human factors. Draft procedure covering control of operator aids presently under review.

DISTRIBUTION CODE: A003S COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

NOTES: 1cy NMSS/FCAF/PM. LPDR 2cys. 05000387
 1cy NMSS/FCAF/PM. LPDR 2cys. 05000388

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	NRR LB2 BC	7		
INTERNAL:	IE/DEPER/EPB	3	NRR PAULSON, W	1
	NRR/DHFS/HFEB	5	NRR/DHFS/PSRB	1
	NRR/DL/ORAB	1	NRR/DL/ORB5	5
	NRR/DSI/CPB	1	NRR/DSI/ICSB	1
	NRR/DSI/METB	1	NRR/DSI/RAB	1
	NRR/DSI/RSB	1	REG FILES	1
	RGN1	1		
EXTERNAL:	LPDR	2	NRC PDR	1
	NSIC	1	NTIS	1
NOTES:		3		



УВАЖАЕМЫЙ ГЕНЕРАЛ
СЕРГЕЙ ФЕДОРОВИЧ

ВАС
ПРОСИМ ПРИНЯТЬ
СВОЮ ДОРОЖКУ

С УВАЖЕНИЕМ
И С ПОДАРОМ

ВАС
ПРОСИМ ПРИНЯТЬ
СВОЮ ДОРОЖКУ
С УВАЖЕНИЕМ
И С ПОДАРОМ

УВАЖАЕМЫЙ ГЕНЕРАЛ
СЕРГЕЙ ФЕДОРОВИЧ
ВАС
ПРОСИМ ПРИНЯТЬ
СВОЮ ДОРОЖКУ
С УВАЖЕНИЕМ
И С ПОДАРОМ
УВАЖАЕМЫЙ ГЕНЕРАЛ
СЕРГЕЙ ФЕДОРОВИЧ
ВАС
ПРОСИМ ПРИНЯТЬ
СВОЮ ДОРОЖКУ
С УВАЖЕНИЕМ
И С ПОДАРОМ
УВАЖАЕМЫЙ ГЕНЕРАЛ
СЕРГЕЙ ФЕДОРОВИЧ
ВАС
ПРОСИМ ПРИНЯТЬ
СВОЮ ДОРОЖКУ
С УВАЖЕНИЕМ
И С ПОДАРОМ



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

May 31, 1984

Director of Nuclear Reactor Regulation
Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
DETAILED CONTROL ROOM DESIGN REVIEW
ER 100450/100508 FILE 227-10
PLA-2226

DOCKET NOS. 50-387
50-388

Dear Mr. Schwencer:

Based on the discussions between PP&L and your staff on March 12, we believed the purpose of your May 1 letter would be to provide comments on our proposed resolution of 45 HEDs described in our DCRDR Summary Report. However, your cover letter went beyond that and you suggest PP&L has an insufficient level of management attention and concern for the intent and objectives of a DCRDR.

You expressed concern that PP&L had failed to implement enhancement-type solutions (paint-label-tape) to correct HEDs. In fact, of 157 HEDs identified for correction, 112 or 71% of the total were corrected prior to submission of the Summary Report. This was noted on page 21 of the Summary Report.

Your letter was critical that we still have a number of HEDs yet to be corrected. It is our understanding that the Summary Report was never intended to be a close-out report, whereby all work was to be completed at time of submission. We have been using paragraph (g), page 12, of Supplement 1 to NUREG-0737 for guidance. This states:

"g. After the staff has issued an SER and licensees have addressed any open issues, they may begin their upgrade according to an approved schedule that has been negotiated with the staff."

PP&L fully intended to correct the remaining 45 HEDs, and in fact, labeled this section "To Do." However, the SER questioned a number of these proposed resolutions, creating open issues. We believed the open issues required resolution before scheduling of the upgrade could occur.

8406050309 840531
PDR ADDCK 05000387
F PDR

Handwritten: A003 '10



[The text in this section is extremely faint and illegible. It appears to be a multi-paragraph document, possibly a letter or a report, with several lines of text scattered across the page. The characters are too light to be accurately transcribed.]

Your letter charges there is insufficient commitment by PP&L management to improve human factors in the control room. This statement is erroneous. In fact, we believe quite the opposite to be true. PP&L has consistently been in the forefront among utilities in applying human factors. For example:

- o Early integration of human factors principles in the design of Susquehanna's advanced control room (Summary Report - Section 1).
- o PDA (Preliminary Design Assessment) conducted in 1980. 42 HEDs corrected in Unit 1 (and Unit 2) as a pre-license condition.
- o PP&L submitted DCRDR program plan in May 1981, one of the first in the industry. NRC approved the plan in 1983.
- o DCRDR Summary Report submitted on schedule in November 1983. Again, one of the first Summary Reports submitted to the Commission.
- o A formal human factors program (NDI 6.7.1) in place since 1983. All proposed modifications to control room inner ring panels require human factors review. HFE input has also been utilized in SPDS, EOP development, Health Physics, and many miscellaneous projects.

Your letter mentions that an administrative procedure, covering temporary labels, has yet to be developed. You infer this indicates insufficient management attention. We feel this generalization is derived from insufficient evidence. Again, this discrepancy was listed as "To Do." Informal control of temporary labels has previously existed, but the development of a formal procedure has been subjected to constraints of priority and available resources.

In fact, a draft procedure covering control of operator aids (including temporary labels) is presently undergoing review.

In summary, human factors has, and will continue to be given, high priority at PP&L. We have one of the strongest programs in the industry and are more than willing to work with the NRC in reaching common goals.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

LGP:mp

lgplte001173c

cc:

R. L. Perch

NRC



1957

Sp. 1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000

1000