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AUTH. NAME CURTIS, N.W.  
 AUTHUR AFFILIATION Pennsylvania Power & Light Co.  
 RECIP. NAME GREENBERG, M.  
 RECIPIENT AFFILIATION Division of Human Factors Safety

SUBJECT: Forwards comments on NUREG-0801, "Evaluation Criteria for Detailed Control Room Design Review." Consideration in preparation of final documentation requested.

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*Add: Marcus Greenberg*

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Norman W. Curtis  
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December 23, 1981

Mr. Marcus Greenberg  
Division of Human Factors Safety  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS ON NUREG 0801  
ER 100450                      FILE 841-2  
PLA-982                              841-9

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Dear Mr. Greenberg:

Enclosed are PP&L's comments on NUREG 0801 - Evaluation Criteria for Detailed Control Room Design Review. Please take them under consideration in preparation of final documentation on this subject.

Very truly yours,

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

RTJ:mp  
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Enclosures

*Handwritten:* Add: Marcus Greenberg  
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COMMENTS ON NUREG 0801

- o It may be wrong to assume that the task analysis performed for NUREG 700 can be a basis for determining operator training and staffing needs, determining what information is needed for the Safety Parameter Display System and developing emergency operating procedures. Each is a distinct evolution and should be addressed on its own requirements.
- o What is the purpose of site visits? Will they attempt to validate portions of the program plan written into NUREG 700 or will the NRC (based on its review of preliminary plan submitted by the utility) provide specific guidance to that utility on portions of the utility plan found to be lacking by the NRC?
- o It is not clear how to incorporate cost effectiveness evaluations into scheduling. Enhancements may provide a significant, long-term improvement, while providing a cost effective solution which does not meet the "letter" of the guidelines in NUREG 700. The NRC should consider delaying decision on a schedule to change control room designs until the results of evaluations of operation performance based on enhanced systems can be evaluated.
- o It is not apparent from NUREG 0801 that enough serious consideration is being given to the effect of many changes. While each individual change to meet the guidelines may improve system operability, operators may be unfairly asked to re-learn too many control schemes from an unrealistic schedule for improvements. This is not clearly called out in the guidelines for scheduling even though in defining HEDs, cumulative effects are to be considered.

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