



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

IEEE  
566

AUG 31 1976

Mr. A. J. Spurgin, Chairman,  
IEEE NPPC&P WG & SC 1.2  
General Atomic Company  
P. O. Box 81608  
San Diego, California 92138

Dear Mr. Spurgin:

In accordance with IEEE/NPEC procedures, I am writing to set forth the reasons for my final "negative" ballot on the proposed IEEE 566, "Guide for the Design of Display and Control Facilities for Central Control Rooms of Nuclear Generating Stations," Draft 3C.

As I indicated during final consideration and ballot at the recent NPEC meeting in San Diego (NPEC 76-2), the document is lacking in specific and enforceable requirements essential to make it suitable for use in the regulatory process. This was also stated as principal comment A 1 of my December 1975 letter ballot:

"The proposed guide includes a multiplicity of general considerations, principally items which the designer should consider in the design of display and control facilities. What is needed is specific guidance on how displays should be arranged, what kind of displays, alarms, recordings, etc., should be provided for various parameters in each type of reactor, at least a minimum set of displays, alarms and recordings. Additional optional displays should also be specified with criteria for determining whether or not they should be included in a particular design."

Examples of non-specific, non-enforceable provisions of the document include Sections 7.1, 7.2:1 ("as appropriate..."), 7.3.1, 7.3.2 ("shall be considered..."), 7.6.1, 7.10.

There are other unresolved principal comments as follows:

a) The relationship between controls located in the central control room and controls for the same equipment located elsewhere in the plant should be addressed (Comment A2). Implicit in the comment is the issue of criteria for determining which controls can override the others.

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- b) Requirements unique to multi-unit stations should be addressed (Comment A5).
- c) Criteria should be included to determine which manual controls should be in the central control room (Comments B8 and B27).
- d) More practical and specific criteria on what conditions must be alarmed should be provided. Other matters such as whether the alarm should be audible or visual, or both, flashing or steady, should be included (Comment B11).
- e) The provisions of Regulatory Guide 1.47 should be included as requirements for bypass indication.
- f) The control room design basis should include a listing of all parameters which require indicators, all parameters which require recording, all parameters which require alarms and all equipment which requires manual control in the control room (Comment B1).
- g) Criteria should be included for determining which test facilities must be located within the control room. Those not required should be kept out (B29).

I trust that I have satisfactorily explained the reasons for my negative ballot. Please contact me if you have any questions.

Sincerely,



D. F. Sullivan, Member  
IEEE/NPEC

CC: T. J. Martin  
L. M. Johnson  
C. Chiappetta