

DOCKET NUMBER PR 50

29

PROPOSED RULE (45 FR 54708)

GULF STATES UTILITIES COMPANY

POST OFFICE BOX 2951 • BEAUMONT, TEXAS 77704
AREA CODE 713 838-3843

September 29, 1980

RBG - 8659
File No. G9.23



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Gentlemen:

COMMENTS ON NUREG-0696
"FUNCTIONAL CRITERIA FOR
EMERGENCY RESPONSE FACILITIES"

Gulf States Utilities Company (GSU) has reviewed the draft report of NUREG-0696, "Functional Criteria for Emergency Response Facilities," concerning the Safety Parameter Display System (SPDS), onsite Technical Support Center (TSC), Emergency Operations Facility (EOF), and Nuclear Data Link (NDL). GSU agrees that a definite response role needs to be defined for management and that the coordination of all support personnel and organizations along with immediate access to information is necessary in order to manage an accident. It is also important that a clear and accurate line of communications be available in order to inform the general public, media, and state and local agencies of any special instructions or information necessary. However, it seems the emphasis within this document should be placed on monitoring data and references to the control of plant operations implied or explicit should be eliminated. The following detailed comments are offered in response to NUREG-0696.

It is not clear from Figure 1 whether a common connection or independent connection exists between the control room, the TSC, and the EOF. It is recommended that wherever appropriate, independent connections be made in order to assure quicker retrieval and display of information.

Again, from Figure 1, it seems that the NDL receives information from both the Data Acquisition System (DAS) and directly from the SPDS. This redundancy does not seem necessary.

ACKNOWLEDGED by card 10/10/80

8010220 147

In reference to the Nuclear Data Link on page 3, number 4, it is stated that one of the roles of the NRC Incident Response program is to inform officials and the general public about all aspects of the incident and response activities. If the NRC takes the avenue of informing the public itself, this may be conflicting with the state and local responsibilities for notifying the public.

It is not clear from Figure 1 whether the 30-minute history information should be available in the EOF also.

The SPDS display is required to be readable from the operating stations of the shift supervisor, control room SRO, shift technical advisor, and at least one RO. This requirement could be impractical due to space or connection limitations. We believe a reasonable requirement, still keeping safety and quick access in mind, would be to require a display within easy access to those specified above.

A clearly defined list of parameters or data to be transmitted via the NDL and/or shown on the SPDS should be developed. This list should note differences for reactor vendors and product lines. Also, direct display of isotopic data is not directly achievable through the computer. A better defined list would result in less confusion.

It is not clear what the distinction is between the unavailability goals of .01 for the total system and .001 for the individual parameters within the TSC. A better distinction between these two unavailability goals should be provided. Also, the unavailability goal of less than .001 seems to be unreasonable and unachievable. The .001 goal (approximately 8 hours per year) may be exceeded when compared to existing practices. For example, preventive maintenance alone may require a minimum of 12 hours per year with an additional 30 minutes per week spent on restoring and cleaning computer tapes. Also, down-time resulting from possible modifications to the existing computer systems should be considered when determining an unavailability goal. The unreliability of .003 (approximately 24 hours per year) for the computer equipment is very low considering other factors such as telephone line reliabilities for the NDL, electrical current failures, and backup power supplies. The "Macro Report" computer study on availability and reliability referred to at the NRC workshop in Atlanta, Georgia, August 22, 1980, has not been released, therefore, unavailable for review. It is recommended that the availability and reliability figures chosen represent actual state-of-the-art capabilities.

The term "face-to-face interaction" between the control room and the TSC could be interpreted to mean person-to-person meeting. It seems that the use of closed-circuit T.V. could accomplish the necessary eye-to-eye contact. Therefore, clarification should be provided here.

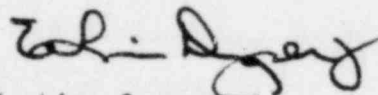
Secretary of the Commission
September 29, 1980
Page 3

The two-minute walking time criteria between the TSC and control room seems unnecessary when both facilities are equipped with the same emergency information. It is not clear as to the basis for this two-minute walking distance.

It does not appear to be necessary to monitor the safety parameters during refueling outages due to the low probability of a severe accident occurring during this period.

Thank you for considering these comments in preparing the final revision of NUREG-0696.

Sincerely,



E. Linn Draper, Jr.
Vice President - Technology