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October 2, 1980

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Director, Division of Human Factors Safety

Subject: Comments on Draft Human Engineering Guide to Control Room
Evaluation NUPEG/CR-1580 (45FR55551-8/20/80)

Dear Sir:

Yankee Atomic Electric Company appreciates the opportunity to comment on the subject draft document. Yankee Atomic owns and operates a nuclear power generating plant in Rowe, Massachusetts. The Nuclear Services Division also provides engineering services for other nuclear power plants in the Northeast including Vermont Yankee, Maine Yankee, and Seabrook 1 and 2.

Yankee Atomic supports improving information provided to the control room operators by upgrading control board displays where appropriate. We also feel that the best way of determining "appropriateness" involves gathering input from plant operators and then evaluating the control boards based on their comments and emergency response requirements. This basic approach was taken by the Control Room Subgroup of the General Electric (GE) Owners Group to establish control room evaluation guidelines. These draft guidelines were developed along the same lines as discussed under Task I.D. of the Task Action Plan. These guidelines were discussed with members of the Division of Human Factors Safety of NRR in a meeting with industry representatives on July 29, 1980 in NRC's Bethesda offices. We understand that the NRC was receptive to the approach presented by the GE Owners Group as well as the assertion by the group that the draft is a cumbersome document to use practically. We continue to believe that the draft is not useful as a working document and we strongly urge the NRC to rewrite the draft NUREG considering the approach and resulting guidelines presented by the GE Owners Group.

Should you require additional information regarding our comments, please contact us.

Very truly yours,

D. W. Edwards

D. W. Edwards, Director
Operational Projects

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