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FLORIDA POWER & LIGHT COMPANY

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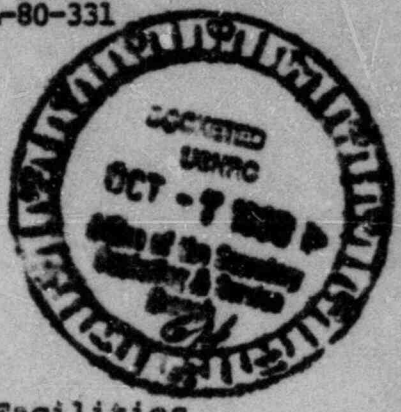


Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

Re: NUREG 0696
Functional Criteria for Emergency Response Facilities

Florida Power & Light Company has reviewed the subject document, and we offer the following comments thereon:

1. The legal bases for this document are not obvious. It would appear that the need to establish a nuclear data link to NRC goes beyond previous requirements and may not, in fact, have any legal bases.

2. While this document goes beyond previous descriptions of these facilities, the objective criteria for the data that must be presented in the respective locations are still not clear. Before licensees can make adequate plans to comply, the criteria need to be defined. The proposed NUREG 0696 Draft does not meet this need.

3. Since the responsibility for NRC activities in the event of emergency resides with the regional office, there would not seem to be sufficient justification for the nuclear data link to Washington. The responsible agents of the NRC regional office would be on site, and presumably, stationed in the Emergency Operation Center, where significant plant parameters must be displayed. It would not seem necessary to have the same parameters available in Washington.

4. The parameter sets for each emergency response facility should be based on the defined purpose of that facility, vice using Reg Guide 1.97, which is not finalized as of this time.

5. The term "unavailability" should be better defined. The loss of a single input parameter input should

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not be defined as unavailability, but rather the loss of the facility is more appropriate to define unavailability of the facility. Current definition is unreasonably restrictive.

6. The requirement for OBE qualification for the SPDS should be deleted. This system is supposed to enhance the operator-plant interface, not supplant the normal parameter indications available to the operator in the Control Room, which are seismically qualified. The additional requirement for OBE qualification will unnecessarily delay implementation of the system and raise the cost of the system, potentially limiting designs to a limited number of suppliers and configurations. This could potentially decrease the reliability and usefulness of the system.

7. Unavailability goals of .001 are too severe for systems that are in reality operator aids, not the safety class display that is already available in the Control Room.. There are many efforts underway to improve Control Room response; the SPDS should be considered to be just a portion of the total enhancement effort of improving the man-machine interface.

8. The location of the TSC should be plant specific. Our plants have had extensive modifications to support facilities, many of which take up space near the Control Room. The Turkey Point units have a common Control Room for both units. A TSC must be somewhere within our plant boundary, but the desire to put the TSC in the same building as the Control Room is not possible. A requirement of two minutes' walking distance places an unnecessary and impractical restraint upon our facilities. A better solution would be to locate the TSC within the owner-controlled area, as near as practical to the Control Room. This would allow the licensees to coordinate the design of a TSC with the overall site plan. Any reference to walking distance on a time basis should be deleted. Guidelines in the area of ten minutes would be more reasonable and consistent with the idea of facilitating face to face communications.

9. All references to an alternate TSC should be deleted. If the requirements for a TSC are realistic, an alternate facility will not be necessary.

10. Mr. Eisenhut's letter of August 1, 1980, gives implementation schedules. We feel this is inappropriate

To: Mr. Samuel J. Chilk (cont'd)

in light of the fact that the Functional Criteria have not been issued in final form. In addition, we would be reluctant to proceed with equipment/interface specifications, building construction and hardware procurement prior to completion of NRC review and approval of our conceptual designs. Submission dates for designs should be based upon final publication of the Functional Criteria for Emergency Response Facilities (NUREG 0696) and upon any associated guies that are alluded to in the draft NUREG. A more appropriate completion date would be about two and one-half years after NRC approval of our conceptual designs for our facilities. This time frame is based upon a best effort approach, utilizing presently available technology and readily accessible equipment. Additional requirements, such as seismic OBE and Human Factors' reviews of the Control Room to integrate these systems with the present Control Room, may negatively impact that time period.

We appreciate the opportunity to comment on this document.

Very truly yours,

J. A. DeMastry
for

Robert E. Uhrig
Vice President
Advanced Systems & Technology

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