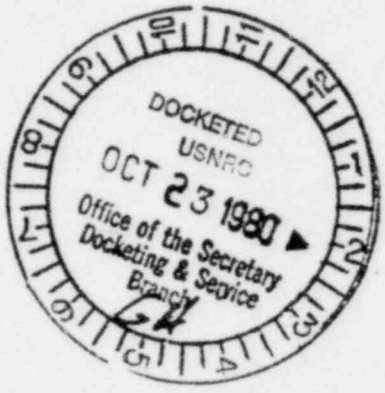
(34)

DOCKET NUMBER
PROPOSED RULE PR 50
(45FR54708)

NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511



October 10, 1980

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attention: Docketing and Service Branch
Washington, D. C. 20555

Dear Sirs:

Your Federal Register notice of August 15, 1980 requested comments on the proposed functional criteria of NUREG 0696, "Functional Criteria for Emergency Response Facilities." Summarized below are Niagara Mohawk's comments regarding this document.

General Comments

The criteria outlined in NUREG 0696 will require a substantial commitment by utilities in manpower and dollars. A major portion of the associated facilities will very probably never be used to the full extent of their capability.

The major consideration should be an evaluation of utilizing existing facilities even though they may not be in complete compliance with the criteria. The improvement in safety made by the expansion of these facilities is small while costs could be substantial.

We agree that some type of emergency facilities are needed. However, the criteria for these facilities must weigh strongly the existing equipment and space available at operating plants.

Since these facilities may be considered only an aid and not a necessity in recovery operations, it would seem prudent to give major consideration to an alternate use. In this way, a continuing benefit may be derived from the major effort which will go into their design and construction.

Acknowledged by card 10/24/80

A-44, PP. 50

8011050166

NUREG 0696 outlines data transmittal requirements for the Technical Support Center (TSC), Emergency Operations Facility (EOF) control room and Nuclear Regulatory Commission (NRC). Since the functional requirements of these facilities is different, transmittal of duplicate data to each facility should not be necessary.

The implementation schedules developed by NRC for the emergency facilities appear to be too short, considering that specific functional criteria for these facilities have not been established. It is ironic to note that the schedule associated with NRC required portions of the emergency facilities (i.e., Nuclear Data Link) is much longer than those of the licensees.

The EOF and NRC Operations Center should not provide direct advice and support to the nuclear facility operator. This could hinder recovery from an accident by having too many centers capable of communicating with the control room. All communication with the control room should be through the TSC.

The requirements to include the Safety Parameter Display System (SPDS), TSC and EOF in the plant Technical Specifications is not consistent with the level of safety involved or with the NRC's proposed regulation changes which would limit the items incorporated into a plant's Technical Specifications (Federal Register Notice of July 8, 1980).

Specific Comments

Safety Parameter Display System

The primary function of the Safety Parameter Display System (SPDS) is to help operating personnel in the control room make quick assessments of plant safety status. In order to perform this function, the SPDS must contain a concise list of plant operating data. The requirements of the SPDS as stated in NUREG 0696 appear to require too large a number of parameters and readouts. If too many plant parameters are displayed, it will diminish the effectiveness of the SPDS. The SPDS should be limited to primary variables associated with a limited number of safety parameters. Safety parameters would include core cooling, fuel integrity, reactivity, reactor coolant system integrity and core heat removal capability. Primary variables for one safety parameter such as core cooling would include reactor water level, reactor coolant temperature, and core flow.

Human factors engineering dictates the instruments and controls be near each other. Inherently, during emergency conditions, the operator will likely prefer using his normal instrumentation.

The SPDS size specification outlined in NUREG 0696 may arbitrarily be too restrictive. The requirement should be that the display system should be readable by the persons listed without interference with the normal movement or visual access of other control room operational systems and displays.

The display of the SPDS in the TSC should not be required since parameters can be easily read using closed circuit televisions in the control room with monitors in the TSC.

The requirement for a separate computer to process the signals for the SPDS is too restrictive. Niagara Mohawk is upgrading its present plant process computer requirement to install a new process computer where present process computer demonstrates a capability of fully supporting post accident data requirements is inappropriate.

On Page 8 under F. Safety Parameter Display System Design criteria, there is no need for the data acquisition system to be designed and qualified to the criteria stated in Reg. Guide 1.97. An electrically isolated system would be adequate. Electrical isolation provides the necessary separation requirements with safety related systems.

Technical Support Center

As required by NRC letter dated September 13, 1979, Niagara Mohawk had established design criteria and initiated modifications to establish a Technical Support Center (TSC) by January 1, 1981. The NRC staff has reviewed and accepted the TSC design criteria. The newly established criteria proposed in NUREG 0696 may make our current plans obsolete without considering added cost and benefits to safety.

Guidelines for habitable space of 1875 square feet, including a private conference room for NRC consultations, is excessive. These space requirements meet or exceed current normal working space requirements for personnel. Working in a smaller space during emergency conditions would not decrease the abilities of the individuals involved. Dictating these space requirements for future, not yet designed plants may be appropriate; backfitting existing plants is impractical.

Telephones in the TSC for exclusive use of NRC personnel are not necessary. Extension telephones will be available.

The use of the process computer for data transmittal to the TSC should not be excluded. Such exclusion may require a duplicate process computers and parallel wiring almost all of the major sensors. This requirement is excessive. The requirement on Page 9 that the TSC and EOF data system shall have interactive terminal and display capability should be deleted. The TSC and EOF have different functions and require different data to perform their function.

For multiple unit facilities, it is practical to provide a single TSC for both units. Locating such a common TSC within the two minute walking distance of both control rooms may be difficult. The TSC need not be within two minutes walking distance for personnel to perform plant assessment and diagnostic without interfering with the control room staff accident response. Telephone communication with CCTV provides an acceptable alternative to face-to-face interaction with control room personnel.

NUREG 0696 states that the plant operations management will shift from the control room to the TSC when the TSC is activated for Alert or higher emergency classes. This is contrary to what has previously been stated by the NRC NUREG 0585 Items 2.2.1a and 2.2.2b. NUREG 0578 states that the command and control function is to remain in the control room and that the TSC is to provide management support and accident assessment and diagnosis. In some instances plant management may remain in the control room during all phases of the accident to assist in the command and control functions.

Emergency Operations Facility

NUREG 0696 states that the initial function of the Emergency Operations Facility (EOF) shall be to evaluate the magnitude and effects of potential radioactive releases from the plant and to recommend appropriate offsite protective measures. To perform this function, it is not necessary to duplicate TSC instrumentation in the EOF.

Backup emergency standby power instead of having the capability to transfer the EOF functions to an alternate EOF facility should be acceptable.

Since the function of the EOF is to provide continuous coordination and evaluation of licensee activities during an emergency, it is not necessary to have ready access to up-to-date plant records, procedures and emergency procedures and emergency plans at the EOF. Functions requiring this information would be handled by the staff located at the TSC.

The requirements for habitability, size and location may place unnecessary restrictions on the EOF.

Nuclear Data Link

The Nuclear Data Link (NDL) could supplement, but not replace, direct and concurrent person to person voice communication between the facility and the NRC headquarters. The concurrent voice communication is essential to assure that both the facility and the NRC personnel are simultaneously aware of the nature and interpretation of the information being transmitted.

NUREG 0696 indicates that a NDL will be necessary to provide information to the NRC for them to inform officials and the general public about all aspects of the incident and response activities. The licensee, not the NRC, should be responsible for all reports to the general public about all aspects of an accident. Interpretation of statements from one onsite and one remote source by the media can lead to confusing information being transmitted to the public.

NUREG 0696 states that in extreme cases, the NRC may direct that certain operations be performed at the nuclear facility via information from the NDL. If such a situation should occur, NRC should be in a position to assume full responsibilities for its actions.

It is questionable what the NRC plans to do with up to 140 data parameter items for up to 150 nuclear power plants (considering a data sampling rate of once per minute).

The transmittal of NDL information should only be made during emergency conditions. Data transmittal activation to the NRC should be controlled by the licensee and be dictated by the severity of the accident.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

D. P. Dise
Vice President Engineering

SWW:ja