

April 10, 1981

FILE: NG-3514

SERIAL: NO-81-526

Mr. Voss Moore  
Division of Human Factors Safety  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Moore:

This letter transmits to you the comments from Carolina Power & Light Company on Draft NUREG-0659 for your consideration. Our comments are as follows:

GENERAL COMMENTS

1. The "Systems Review" as outlined in the subject NUREG is much too comprehensive and would require many man-years to complete. It appears that this type of review is outside the scope of Human Factors and if required, would require widely diverse technical expertise not normally available, and would frequently produce questionable results.
2. Checklists contained in the subject document are quite detailed and are overly subjective. They should be reviewed and revised to eliminate, to the extent possible, the subjective evaluations.
3. Preliminary review of the subject NUREG indicates that the NRC and the industry has done an adequate job in defining which guidelines are applicable to nuclear power plants, as well as deleting guidelines which were not applicable.

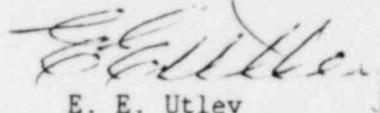
SPECIFIC COMMENTS

1. One-inch labeling on annunciators is unnecessary and would significantly increase the size of annunciator systems. (Reference 6.3.3.1.c)
2. Vertical labeling on meters is the standard method utilized by the industry. Horizontal labeling would require much more space on the main control board if recommended lettering sizes were utilized. (Reference 6.8.1.6)

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- 3. The guidelines recommend that labeling be above components. Labeling below components is acceptable as long as it is consistent across the main control board. (Reference 6.8.1.1)
- 4. The guidelines recommend left to right and top to bottom grouping for controls and displays. Bottom to top grouping is acceptable as long as it is consistent across the main control board. (Reference 6.4.2.1 and 6.7.2.1.a.)
- 5. The maximum height of 52 inches for primary controls is unnecessarily restrictive. (Reference 6.4.2.1)

Yours very truly,



E. E. Utley  
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 File: BC/A-4  
 File: RC/A-2  
 File: R-2-  
 File: B-X-