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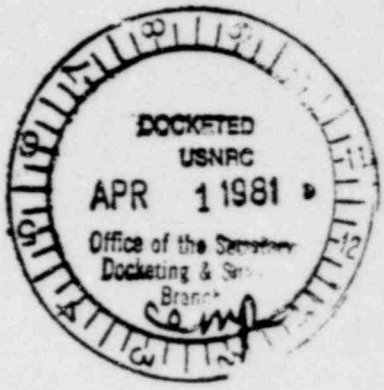

March 19, 1981

DOCKET NUMBER
PROPOSED RULE PR-Misc. Notice (Reg Guide)

Mr. G. A. Arlotto, Director
Division of Engineering Standards
Office of Standards Development
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docket Nos.: STN 50-546
STN 50-547
Construction Permit Nos.:
CPPR-170
CPPR-171

Dear Mr. Arlotto:

We at Public Service Company of Indiana, Inc. (PSI) wish to offer our comments on the Second Proposed Revision 3 to Regulatory Guide 1.33, "Quality Assurance Program Requirement (Operation)." Our comments are as follows:

1) Appendix A, Excerpt from SECY-80-242, states that the Independent Safety Engineering Group must perform certain "audit activities" as indicated in the last column of Table 1. The next paragraph, however, states, "this is not to suggest detailed auditing of operations by the Independent Safety Engineering Group."

   These statements are confusing. It is our belief that the intent and objectives should be clearly defined for so specific and detailed a structure for auditing and/or surveillance as described in this proposed revision.

   The Independent Safety Engineering Group should be able to perform typical engineering functions such as 10 CFR 50.59 reviews.

2) Part C, Regulatory position states:

   "Section 3.3, 'Authorities and Responsibilities for Administrative Controls and Quality Assurance Program Activities', requires persons or organizations responsible for defining and measuring the overall effectiveness of the quality assurance program to be sufficiently independent from cost and scheduling considerations when opposed to safety considerations. In addition, those persons or organizations responsible for the areas of training and radiation protection should be independent from operating pressures."

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We feel that a reporting status for training and radiation protection groups outside of plant management is not necessary and should not be a requirement. An open line of communication with higher management, outside of the operating organization, as indicated by a dotted line on the organizational chart would afford all of the independence needed.

3) We are deeply concerned about the continuing proliferation of quality assurance requirements which are being introduced into Regulatory Guide 1.33. Many of these requirements are intended to enhance safety, however, it must be asserted that such changes impact the man-machine interface perhaps even more so than those human factors concerns which have received attention since the accident at TMI-2, and therefore need to be justified on the basis of their overall effect on control room operation. It should be recognized that greater complexity in control room operability is not desirable.

In this regard the requirement which states, "Procedures for Abnormal, Offnormal, or Alarm Conditions . . . each annunciator associated with structures, systems, or components important to safety should have a separate written procedure," is not an appropriate requirement. The number of procedures required would be very large. Certain annunciators alone may require a specific action, however, if numerous annunciator alarms are received, the specific combination may require completely different actions. In the case of numerous alarms, two alarms may, according to each specific annunciator alarm procedure, require two opposite and conflicting actions be taken. All possible combinations of annunciator alarms would mean an extremely large number of such procedures.

Very rarely do single alarms occur. Therefore, the value of such procedures for each annunciator would be questionable. Such a procedure network would probably cause confusion for the operator rather than bringing about the orderliness for which they would be intended.

It is our belief that adherence to such a complicated procedure network would not allow the operator the independence needed for intelligent diagnostic thinking. Such procedures cannot take the place of good judgement on the part of the control room operator and should only be implemented after it is determined that they in fact prove useful to the operator.

4) We at PSI recommend that this document undergo a human factors review by licensed industrial psychologists for its impact on safety.

March 19, 1981

We thank you for this opportunity to comment on the proposed changes to Regulatory Guide 1.33.

Sincerely,

S. W. Shields

MRK/gb