



Portland General Electric Company

Bart D. Withers Vice President

December 24, 1981

Division of Human Factors Safety  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555  
ATTN: M. Greenberg



Dear Mr. Greenberg:

Comments on NUREG-0801

We have reviewed NUREG-0801, Evaluation Criteria for Detailed Control Room Design Review. We appreciate being given the opportunity to review and submit comments on this draft report. Our preliminary comments are attached. Due to the importance of this document and its potential impact on the control room review process, we request that additional time be allowed for further study and formulation of comments.

Sincerely,

Bart D. Withers  
Vice President  
Nuclear

Attachment

c: Mr. Lynn Frank, Director  
State of Oregon  
Department of Energy

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121 S.W. Salmon Street, Portland, Oregon 97204

Comments on NUREG-0801

1. Page x, Preface

The staff should realize that much of the development work for Emergency Operating Procedures (EOP) Guidelines was performed well in advance of the publication of NUREG-0700 and NUREG-0799. This was necessary to meet NRC dates for implementation of new emergency procedures. Hence, completion of a task analysis well in advance of Owners Group generic EOP guidelines that is suitable for use in the NUREG-0700 system review is not a practical expectation.

2. Page xi, Preface

The latest NRC guidance on SPDS installation (February 18, 1981 letter from D. G. Eisenhower) specified October 1, 1982 as the expected installation date. NUREG-0801 indicates the SPDS should be installed in April 1983. Is the NUREG-0801 date an official change to the SPDS implementation date?

3. Page 2, Section 1.1

There are certain to be many varied approaches that will successfully complete the control room design review. The requirement that any departures from the methodologies recommended in NUREG-0700 or NUREG-0801 be justified, unnecessarily restricts creative methods of performing the review. The NRC should be concerned with the results of the review vice details of the methodology used to perform it.

4. Pages 7 through 10, Section 2.1.1

NUREG-0801 should provide general guidance on review team composition, but not specify the detailed qualifications for review team members. It is possible that the review effort would best be served by participation of personnel excluded under Section 2.1.1 guidelines. Each utility should be given the latitude to judge its personnel and select those it feels most qualified for the review.

5. Page 12, Section 2.1.2

The last paragraph of this section is unnecessarily burdensome and should be deleted. We feel that little is to be gained by specifying the participants in each phase, their responsibilities and their estimated

participation early in the review process. At best, this assignment would be a gross estimate and subject to vast changes as the review progresses.

6. Page 30, Section 4.4

The proposed schedule for modification places the majority of corrective actions into the "prompt" category. Human engineering discrepancies of lesser significance (IB, IC and III) should be scheduled on a longer term schedule. Development and implementation of design changes for all categories currently listed "prompt" could be an impractical requirement to meet.

7. Page 30, Section 4.4

The designations "prompt" and "near term" should be modified to allow for variations in utility refueling schedules. Utilities which refuel shortly after completion of the Detailed Control Room Design Review would not have adequate time to implement changes under the schedule defined in this section.

8. Page 35, Section 5

The submission of before and after photos or videotapes as evidence that corrective actions have been implemented seems to represent a new NRC audit mechanism. We object to requirements to submit photographic evidence of facility modifications.