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OFFICE OF SECRETARY
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BRANCH



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PR - Misc. Notice
(NUREG-0799)
(46 FR 34735)

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

Attn: Docketing and Service Branch

Dear Mr. Chilk:

COMMENTS ON DRAFT CRITERIA FOR PREPARATION
OF EMERGENCY OPERATING PROCEDURES
NUREG-0799

We have reviewed the above listed draft criteria and offer
the following comments for your consideration.

General

Our review included the comments proposed by the Westing-
house Owners Group and INPO. We find that the document
does not allow utilities the needed flexibility to maintain
format continuity throughout their existing documents. The
individual utilities should be allowed to utilize a format
that their operating and training people find effective and
efficient.

The ultimate determination as to the readability of pro-
cedures must be made by the users. Technical content, con-
sistency, format, and training are important in determining
the quality of these procedures.

Section 4.3.4.1 and 4.3.4.4

Steps in the procedures should not be assigned by a Division
of Responsibility among operators but arranged so one indi-
vidual can complete required actions. Operators should not
be required to sign off on completed actions.

Section 4.4.1.6

The word "normal" is ambiguous. Please define; does this
mean power operation or hot standby condition?

Add:
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The Energy People

Acknowledged by card. 12/15/81 *emp*

Section 4.4.2.2b

Present individual utility practices may include required identifying information but formatted consistent with existing associated documents. The criteria should provide the flexibility for acceptance of existing practices and not prescribe physical layout.

Appendix 1

The placing of tables, graphs, etc., on left hand pages is a good practice, but warnings, cautions, etc., should not be removed from the text of the procedures.

We appreciate the opportunity to comment on this draft document.

Very truly yours,



R. L. Mittl
General Manager -
Corporate Quality Assurance

CV:mlp

CC: Don Beckham

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