



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Dalwyn R. Davidson  
VICE PRESIDENT  
SYSTEM ENGINEERING AND CONSTRUCTION

September 25, 1982

DOCKETED  
USNRC

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH *eng*

Attention: Docketing and Service Branch

DOCKET NUMBER 22  
PROPOSED RULE PR-50  
(47FR 38135)

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Proposed rule change to section  
50.54, "Condition of Licenses,"  
10 CFR Part 50; Licensed Operator  
Staffing at Nuclear Power Plants

Dear Sir:

We submit the following comments concerning the proposed change to Section 50.54 of 10 CFR Part 50.

We feel that the proposed change does not adequately define the concept of a shared control room. This lack of a definition for a shared control room leaves this proposed rule open to varying interpretations and leads to misunderstandings between the utility industry and the NRC staff. To prevent these difficulties, we suggest that the following definition for a shared control room be incorporated into the proposed rule change. For multiple unit stations we propose that a shared control room be defined as one in which the layout and controls for each unit are identical for all practical purposes. Further, the control areas for each unit should be adjoining with free access permitted between these control areas. The addition of partitions or mandatory fire walls between these areas of the control room should be construed as being within the definition of a shared control room, provided such partitions or fire walls do not hinder free passage between these areas of the control room.

The addition of the above definition to the proposed rule change will remove the ambiguity associated with the concept of a shared control room while at the same time not alter the intent of the rule changes. If there are any questions concerning these comments, please let me know.

Very truly yours,

*Dalwyn R. Davidson*

Dalwyn R. Davidson  
Vice President  
System Engineering and Construction Group

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add. to  
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cc: Jay Silberg, Esq.  
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Acknowledged by card. 10/18/82 *emp*