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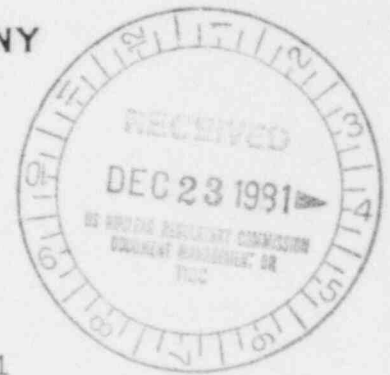
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December 22, 1981

Docket Nos. 50-277
50-278

Mr. S. Ramos
Division of Emergency Preparedness
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Comments on Draft Nureg-0814,
Methodology for Evaluation of
Emergency Response Facilities

Dear Mr. Ramos:

This letter transmits our comments on the referenced document. The draft establishes criteria for evaluating the effectiveness of licensee's emergency response facilities. Some of the criteria infer new requirements not previously presented in Nureg-0654 and Nureg-0696. Of particular concern to us is the new staffing criteria for the TSC and EOF (figures 2.1 and 5.2). In general, a significant portion of the criteria pertains to routine activities. An example of this is the criteria addressing "work stations" within the TSC/EOF, arrangement of equipment, and the flow of information between personnel within these areas (sections 2.3.1 a, b, c, d and 5.4.1 a, b, c).

Another concern deals with the enormous manpower resources required to answer all the questions and standards in the draft document. An example of this is the requirement to validate by an error analysis the allocation of tasks to all personnel assigned to the TSC and EOF. Approval of Nureg 0814 in its present form would divert licensing and engineering personnel from more essential tasks associated with the development of effective emergency plans and facilities.

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Attached for your consideration are markup pages of the draft. Specific concerns are addressed below.

1. Section 2.2.1.b: Requires 2 minutes walking distance between control room and TSC

RESPONSE: This criteria was developed more than a year after the order to construct a TSC. Backfitting to the new criteria would be an exorbitant expense to many utilities. Suggest that this standard apply only to construction licensees.

2. Section 2.2.1 and 5.2.1.b: Requires the maximum exposure a person will receive when the EOF is accessed, or while walking from the control room to the TSC during a design basis accident to be limited to 5 rem.

RESPONSE: The criteria should permit the use of personnel vehicles in traveling between the control room and TSC. Additionally, exposure levels up to the limits of 10CFR20 should be permitted; i.e., 12 rem per year or exposure bank allowance.

3. Section 2.3.1.a, 5.4.1a, 5.4.2.: Requires 75 sq. ft/person in TSC and EOF. Additionally, working space is required for 35 persons, including 9 NRC personnel, in the EOF, and 25 persons, including 5 NRC personnel, in the TSC.

RESPONSE: The number of total personnel, and the number of NRC personnel appears to be excessive. Many of the personnel reporting to and communicating with the TSC/EOF will be performing duties in the field, or situated in other facilities such as the corporate headquarters. It is not expected that all personnel involved in the emergency will be physically working in the TSC/EOF at the same time. The space requirement of 75 sq. ft/person also appears to be excessive and would place a burden on utilities that have

constructed the emergency facilities in accordance with the mandated schedule.

4. Section 2.3.1 a, b, c, d; 5.4.1 a, b, c. Requires:

- a) TSC/EOF to be divided into work stations.
- b) Provide operational sequence diagrams that describes the interaction among TSC/EOF personnel, work stations and items of equipment.
- c) Describe organization of the work stations.
- d) Describe how work spaces are designated to control traffic and noise.

RESPONSE: These standards are unnecessarily detailed. Establishing formal suborganizations related to a particular space within the TSC/EOF restricts the flexibility needed by an organization to respond to the many unknown variables characteristic of an emergency. Responding to these standards and questions would be an unnecessary paper burden. Rather than consider physical work stations, the evaluation should focus on the overall facility organization, responsibilities of each position, and the lines of communication between each position. The effectiveness of the organization can be determined by review of licensees emergency plan submittals and drills.

5. Section 2.6.2 and 5.3.2 requires allocation of tasks to personnel should be validated by an analysis of error likely situations, especially those situations that might exceed the human operator's capability in the areas of perception, memory, information integration and manipulation of controls.

RESPONSE: Suggest these sections be deleted. There is no practical means of performing these validations. The most

effective means of assessing the performance of the emergency organization is by an emergency drill critique.

6. Section 3.3.3 and 3.3.4. Requires the control room staff to verify during an emergency that the TSC communication links are functional, and verify that information going to the emergency response facilities is correct.

RESPONSE: Control room personnel definitely should not be involved with these tasks. Control room personnel should be involved with the operation of plant systems to mitigate and control the extent of the emergency, and to notify selected support organizations. Their involvement with the logistics of the emergency facility activities defeats the purpose of such facilities, and would seriously jeopardize nuclear safety. We would suggest that the TSC staff perform this verification function.

7. Section 2.4.1 and 5.2.2. Requires the TSC/EOF structure to be able to withstand the 100 year flood and windstorm.

RESPONSE: These standards followed the order to install a TSC and EOF by more than a year. Suggest that this standard apply to only future construction applicants.

8. Section 2.6.1.b and 5.3.1.c. Requires the licensee to specify the skills, experience and training of persons needed to accomplish tasks in the TSC/EOF.

RESPONSE: Identifying these characteristics for nuclear plant personnel on a task by task basis represents an unnecessary administrative burden. A more logical approach would be to identify these characteristics for essential plant personnel considering all their responsibilities, both routine and emergency response tasks.

9. Section 2.3.1.f and 5.4.1.g. Requires:

- a) Separate office space to accommodate at least five NRC personnel (250-375 sq. ft.) in the EOF.
- b) Three of the five NRC work stations in the TSC shall provide sufficient privacy for meetings and telephone conversations. The minimum size of this room is 200 sq. ft.

RESPONSE: Existing TSC/EOF facilities may not be able to accommodate the proposed size of private NRC offices. We would suggest a more flexible sizing criteria of 100 sq. ft. minimum for the NRC offices.

10. Organization figures 2.1 and 5.2 specifies:

- a) 20-23 personnel, and 18 positions in the TSC organization
- b) 21 personnel and 19 positions in the EOF organization

RESPONSE:

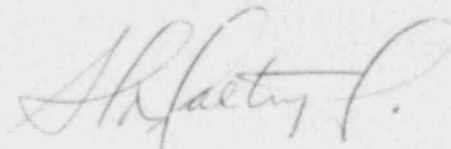
- a) 7-9 health physics and chemistry personnel are proposed for the TSC. Unlike the EOF, the TSC is not primarily involved with dose assessment and other health physics activities. Many of these positions should be deleted from the proposed organization.
- b) The number of personnel and positions proposed for both organizations is excessive. There is not enough personnel to staff the TSC/EOF around the clock in 8 hour shifts when considering the control room and offsite support requirements.
- c) The organization identifies many positions by academic discipline; i.e., mechanical, electrical, hydraulic engineer. This does not reflect the accepted practice

for staffing nuclear facilities. Nuclear plants are staffed by personnel with diverse engineering and technical backgrounds, and are assigned responsibilities related to the major areas of activity; i.e., operations, maintenance, health physics, chemistry, technical engineering support, etc. Fewer positions, with more personnel in a general staff category, would be more appropriate for the emergency facilities. The positions should be patterned after the normal plant organization and recognize the essential tasks to be performed.

- d) The proposed organizations do not acknowledge the pre-arranged support from outside consultants; i.e., Radiation Management Corporation, General Electric Company, INPO, etc.

Should you have any questions regarding our comments, please do not hesitate to contact us.

Very truly yours,



Enclosure

Methodology for Evaluation of Emergency Response Facilities

Draft Report for Comment

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J. Ramos

Division of Emergency Preparedness
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



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PREFACE

The draft report has been compiled with the assistance of the personnel of the Radiological Sciences, Engineering Physics, and Human Affairs Research Center at Pacific Northwest Laboratory. Contributions from the following persons are acknowledged:

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ABSTRACT

This draft report was prepared, largely from the criteria in NUREG-0696 by NRC staff assisted by contractor personnel. The questions in this report, presented in draft form for public comment and interim use, will be used in final form by the staff to review the Emergency Response Facilities conceptual designs which are presently being submitted by nuclear power reactor operators.

This document is issued for comment, and to provide affected licensees an early insight into the approach the staff will use in reviewing Emergency Response Facility proposals. Comments consisting of markup pages will be most useful in revising the document.

Neither this draft nor the final evaluation methodology imposes any new requirements. This approach is a tool for use by the staff in evaluating proposed or existing facilities. The questions have been drawn in large part from NUREG-0696, "Functional Criteria for Emergency Response Facilities", (February 1981) and the requirements of 10 CFR 50.33, 50.47, 50.54 and Appendix E of Part 50. Many of the items in NUREG-0814 are not covered explicitly either by the criteria of NUREG-0696 or by the regulations but are set out as a means of reviewing the functions needed to meet the criteria and the regulations. The NUREG-0814 questions represent only one approach to meeting the regulations and other techniques are equally acceptable but are not included for the sake of brevity. The purpose of NUREG-0814 questions are to remind the reviewers that similar functions must be performed by ERF personnel and equipment.

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1. SUMMARY AND RECOMMENDATIONS

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2. TECHNICAL SUPPORT CENTER

2.1 Integration with Overall Planning

1. The design of the Technical Support Center (TSC) addresses the following goals:

- a. Provides plant management and technical support to plant operations personnel during emergency conditions;
- b. Relieves the reactor operators of peripheral duties and communications not directly related to reactor system manipulations;
- c. Prevents congestion in the control room; and
- d. Performs EOF functions for the ~~Alert Emergency class and for the Site Area Emergency class~~ and General Emergency class until the EOF is functional.

The EOF is not activated for the Alert Emergency Class.

2. The TSC shall be the emergency operations work area for designated technical, engineering, and senior licensee plant management personnel; any other licensee-designated personnel required to provide the needed technical support; and a small staff of NRC personnel.
3. The TSC shall have facilities to support the plant management and technical personnel who will be assigned there during an emergency and will be the primary onsite communications center for the plant during the emergency. TSC personnel shall use the TSC data system to analyze the plant steady-state and dynamic behavior prior to and throughout the course of an accident. The results of this analysis will be used to provide guidance to the control room operating personnel in the management of abnormal conditions and in accident mitigation. TSC personnel will also use the environmental and

radiological information available from the TSC data system to perform the necessary functions of the EOF when this facility is not operable.

4. Since the specific allocation of functions assigned to emergency facilities will differ from design to design, the proposal should clearly state which functions (Operations, Radiological Assessment, etc.) are assigned to the TSC.

2.2 Location

1. The TSC should:

- a. Be in the same building as the control room if possible; if not, then where is it located?
- b. Be within 2 minutes walking distance from the control room.

See comment 1
in attached letter.

Is the TSC within the security perimeter?

Must someone pass through security checkpoints to move from the TSC to the control room?

What provisions have been made for passing through security checkpoints quickly and easily?

What stairways, corridors or equipment spaces must be traversed?

Is the route between the TSC and control room exposed to air-scattered or direct radiation from the containment?

What is the maximum ^{traveling} exposure a person will receive while walking from the control room to the TSC during a design-basis accident (less than ~~or~~ ^{10 CFR 20 limits} equal to 5 rem, including all other exposures, during the course of an accident)?

See comment 2
in attached letter.

Does the route between the control room and the TSC have a radiological monitor or are there provisions for determining exposure rates periodically?

- c. Facilitate face to face interaction with control room personnel.

Are there additional means (e.g., closed circuit TV) between the TSC and the control room to facilitate visual as well as auditory communication?

~~What~~ are the factors that impede face-to-face interaction?

- d. Afford access to any control room information not available in TSC data system.

How can data not available in the TSC data system be provided to the TSC?

2.3 Size

1. The TSC shall provide:

- a. Working space, without crowding, for the personnel assigned to the TSC at the maximum level of occupancy (minimum size of working space provided shall be approximately ~~75~~ 50 sq ft/person).

See comment 3 in letter. Suggest changing 75 sq. ft. to 50 sq. ft.

~~How much space is assigned to each work station?~~

Is an operational sequence diagram provided that describes the interaction among operators, ~~work stations~~ and items of equipment) in the TSC.

Is a locational diagram provided that shows where personnel ~~work stations~~ and items of equipment will be placed? Is the scale of the diagram provided?

See comment 4 in attached letter.
Delete reference to a work station.

~~Is each work station equipped for its function?~~

Are personnel grouped by function?
Does ^{personnel} ~~each~~ ~~work station~~ have sufficient space to carry out ~~its~~ their assigned function?

Explain how the location of facilities and equipment is consistent with the patterns of interpersonal interaction and machine utilizations that will take place.

Who needs access to which machines?

What is the flow of information between persons and groups?

Are personnel performing related tasks located adjacent to one another?

Describe the organization of the ^{TSC} ~~work stations~~. Are they organized according to Figure 2.1?

Describe how the ^{TSC} ~~workspaces~~ are designed to control traffic and noise (mechanical and conversational).

- b. Space for TSC data system equipment needed to transmit data to other locations.

Where is the data displayed?

Show how layouts of displays are coordinated with working space layouts.

How much space is available for working with maps, diagrams, drawings, etc?

Where are the maps, diagrams, drawings, etc. located?

Is there a description of the characteristics of the machines in the TSC that provides a basis for determining their compatibility with anthropometric guidelines (e.g. Van Cott & Kinkade, Human Engineering Guide to Equipment Design)?

Are the characteristics of the data display devices compatible with anthropometric guidelines?

- c. Sufficient space to repair, maintain, and service equipment, displays, and instrumentation.

How much space is provided to allow access to backpanels for repair?

What spare modules are available?

- d. Space for unhindered access to communications equipment by all TSC personnel who need communications capabilities to perform their functions.

Is there a description of the layout of the telephones in the TSC?

How much space is provided for each telephone? (one sq. ft. minimum)

How can a ringing telephone be easily identified (i.e., do telephones light up when ringing)?

- e. Space for storage of and/or access to plant records and historical data.

How much work space is dedicated to this task?

- f. A separate room, adequate for at least three persons, to be used for private NRC consultations.

Does the NRC office
Are three of the five NRC work stations afforded sufficient privacy for meetings and telephone conversations?

See comment 9 in attached letter.

Does this room have a speaker telephone?

What size is this room? ¹⁰⁰~~200~~ sq. ft. minimum)

2. The TSC working space shall be sized for a minimum of 25 persons, including 20 persons designated by the licensee and five NRC personnel.

How many people are assigned to the TSC by the emergency plan, including five NRC personnel?

Is the work space adequate for these people to perform their functions?

2.4 Structure

1. The TSC complex must be able to withstand reasonably expected adverse conditions.

Can the TSC be operable during a 100-year flood?

See comment 7 in attached letter.

Can the TSC withstand a 100-year windstorm?

Is the TSC accessible during floods and storms?

2.5 Habitability

1. The TSC shall have the same radiological habitability as the control room.

Which accidents were analyzed to determine what radiation doses would be received in the TSC during the most severe accidents?

What are the whole body radiation doses during plume passage (less than or equal to 5 rem)?

2. The TSC ventilation system shall be functionally comparable to the control room system (i.e., high efficiency particulate air and charcoal filter). Automatic isolation is not required.

Briefly describe the HVAC system filtration system.

Is the decontamination capability (D.F.) of the TSC system different from the control room system? Briefly describe the difference.

Is the HVAC system controlled to isolate the intake?

At what airborne activity level does isolation occur?

How is the level determined?

Where are the sensors located?

At what radiation levels will these instruments alarm?

Does the system provide a warning of the precautionary radiation levels in a timely manner to allow the TSC personnel to take protective actions?

Are unattended instruments in continuous operation?

How is iodine monitored?

Is the detectibility for airborne I-131 as low as $1E-7$ microcuries/cc?

What is the reliability of the continuously-operating instruments, i.e., is there back-up power for the instruments? Do the instruments meet the manufacturers specifications for availability and accuracy? How often are the instruments calibrated?

4. Supplies of protective clothing, respiratory equipment and potassium iodide shall be readily available to all TSC personnel.

If this is not the case, how many individuals can be supplied?

Are reserves of this equipment available in the TSC or some other nearby location?

Where?

Are instructions for use of KI available?

How is the need for such supplies determined, i.e., when will personnel don respiratory equipment?

Is the protection factor for respiratory equipment equivalent to a full face mask?

3. Radiation monitoring systems shall be either permanently installed or shall be dedicated portable-type instruments (e.g., dose rate and airborne radiation detectors). Detectors shall be able to detect radioiodine as low as $1E-7$ microcuries/cc. The licensee shall provide the TSC with installed radiation monitors or dedicated portable monitoring equipment.

Are dedicated dose-rate instruments, survey meters, and airborne radioactivity monitoring instruments assigned to the TSC?

Which instruments will be used?

How many of each?

Where are they located?

How was the type, number and placement of monitoring instruments determined?

What are the ranges of these instruments?

Do the instrument ranges cover the values expected if the TSC's HVAC decontamination capability fails during a DBA?

Who is assigned to monitor the TSC habitability?

What are the qualifications of this person?

If there is no one assigned, are there fixed instruments equipped with audible and visual alarms?

2.6 Staffing (NUREG-0696 and PNL TSC/EOF Staffing Study)

1. The TSC shall:

- a. Be fully functional within 30 minutes of activation.

How long does it take TSC equipment to become fully functional?

- b. Consist of sufficient technical personnel needed to support the control room including individuals who can handle situations involving operations, maintenance, administration, security, Rad/chem, and communications (Figure 2.1 is an example only).

See comment 10 in attached letter.

Has the licensee identified the tasks that may need to be performed and specified the characteristics (e.g. skills, experience and training) of the persons needed to accomplish these tasks?

See comment 8 in letter.

- ~~2. Allocation of tasks to personnel should be validated by an analysis of error likely situations, especially those situations that might exceed the human operator's capability in the areas of perception, memory, information integration and manipulation of controls.~~

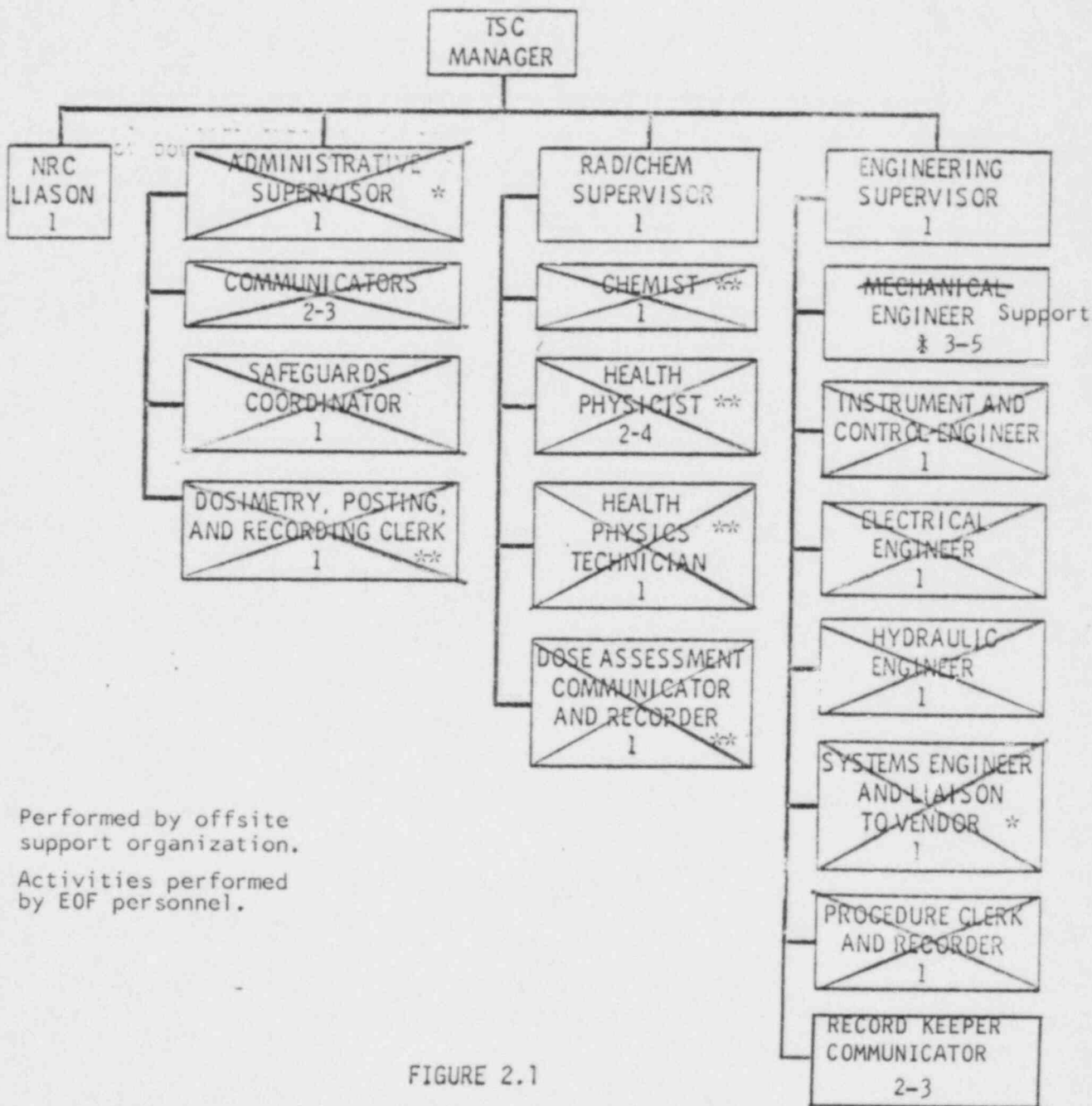
See comment 5 in letter.

What is the total number of personnel assigned to the TSC?

Are there adequate numbers of personnel assigned to the TSC to carry out its function?

TSC ORGANIZATION

See comment 10 in attached letter



* Performed by offsite support organization.

** Activities performed by EOF personnel.

FIGURE 2.1

2.7 Communications

1. If existing licensee communications systems are to be used to meet TSC emergency requirements the licensee must demonstrate the system's ability to handle added TSC requirements under emergency conditions.
2. TSC telephone access to commercial common-carrier services must bypass any onsite or local offsite switching facilities that may be susceptible to loss of power during emergencies.
3. How many switchboard independent commercial telephone lines to the plant are available for use by the TSC during emergencies?
4. TSC voice communications must consist of a reliable primary and backup system and include:
 - a. Hotline telephone in the NRC consultation room on the ENS to the NRC Operations Center.

What is the backup system for communications to the NRC?
 - b. Dedicated telephone in NRC office space on the NRC Health Physics Network.

What is the backup system for communications to the NRC?
 - c. Dedicated telephones to the control room, OSC, and EOF.

Do these telephones provide non-interruptable service between the TSC, EOF or control room?
 - d. Dial telephones that provide access to onsite and offsite locations.

- e. Intercommunications systems between any separate work areas within the TSC.

Is there an intercom to connect the TSC manager and supervisors?

- f. Communications to licensee mobile monitoring teams.
 - g. Communications to State and local operations centers.
 - h. Radio communications with onsite and offsite organizations and response groups.
5. At least two additional dial telephone lines must be provided for use by NRC personnel.
 6. Facsimile transmission capability between the TSC, EOF and NRC Operations Center must also be provided.
 7. Provision must be made for 24-hour per day notification to and activation of the State/local emergency response network, with 24-hour per day manning of communication links that initiate emergency response actions (NUREG-0654).
 8. A coordinated communication link for fixed and mobile medical support facilities shall be provided (NUREG-0654).
 9. Are there descriptions of how the following communications needs are met?

TSC Manager with

Corporate HQ
Control Room
EOF
OSC
NRC
State/local governments
Vendors

Administrative Supervisor with

Corporate HQ
Backup communications
Security force
EOF

Rad/Chem Supervisor with

Radio to HP technicians
HP control point
OSC
Chemical laboratory
EOF
State/local governments
HPN

Engineering Supervisor with

Corporate HQ
Control Room
OSC
EOF
Vendors
NRC
Radio to corrective action teams

2.8 Instrumentation, Data System Equipment,
and Power Supplies

These methodologies are addressed in
Sections 6, 7, 8 and 9.

2.9 Technical Data and Data System

These methodologies are addressed in
sections 6, 7, 8 and 9.

2.10 Records Availability and Management

1. The TSC personnel shall have ready access to up-to-date records, operational specifications, and procedures that include but are not limited to:
 - a. Plant meteorological data,
 - b. SPD systems,
 - c. Plant technical specifications,
 - d. Plant operating procedures,
 - e. Emergency operating procedures,
 - f. Final Safety Analysis Report,
 - g. Plant operating records,
 - h. Plant operations reactor safety committee records and reports,
 - i. Records needed to perform the functions of the EOF when it is not operational, and
 - j. Up-to-date, as-built drawings, schematics, and diagrams showing conditions of plant structures and systems down to the component level, as well as in-plant locations of these systems.
 - k. Checklists, guides, worksheets and other job performance aids.
2. The licensee shall have all of the above records in the TSC in current form when the facility is fully activated.

What procedures have been established to update these records as necessary to ensure that they are current and complete?

Describe the method of storage and presentation of the TSC records which ensures their availability and ease of access under emergency conditions.

3.0 CONTROL ROOM

3.1 Integration with Overall Planning

1. The design of the control room (CR) addresses the following goals during normal operation:

a. The control room is the onsite location from which the nuclear power plant is operated. It contains the instrumentation, controls, and displays for:

nuclear systems,
reactor coolant systems,
steam systems,
electrical systems,
safety systems, and
accident monitoring systems.

b. The control room is staffed during normal operations by a minimum of:

a shift supervisor who is a senior licensed reactor operator and whose duty station may be in the immediate vicinity outside of the control room itself;

a shift foreman who is a senior licensed reactor operator and whose duty station is in the control room;

control room operators, two licensed reactor operators, whose duty stations are in the control room;

auxiliary operators, two reactor operators, whose duty assignments are set by the shift supervisor.

3.3 Communications

1. The following onsite and offsite communication links for continuous information exchange must be available.

commercial telephone
 dedicated telephone
 radio
 plant intercom

Are these communication systems described?

2. The shift supervisor, shift foreman, and technical advisor or their designates must be immediately notified of an abnormal condition. Indicate expected average and maximum notification times.

3. After the TSC is operational, the ~~control room~~ TSC staff must verify that TSC communication links with emergency teams are established and functional.

See comment 6 in attached letter.

4. Verification ^{by the TSC staff} must be made that information going to ERF's is correct.

3.4 ERF Phase

After the TSC is operational, does the Control Room staff relinquish the following functions:

managing plant operations, and

peripheral duties and communications not directly related to reactor system manipulations.

CONTROL ROOM ORGANIZATION

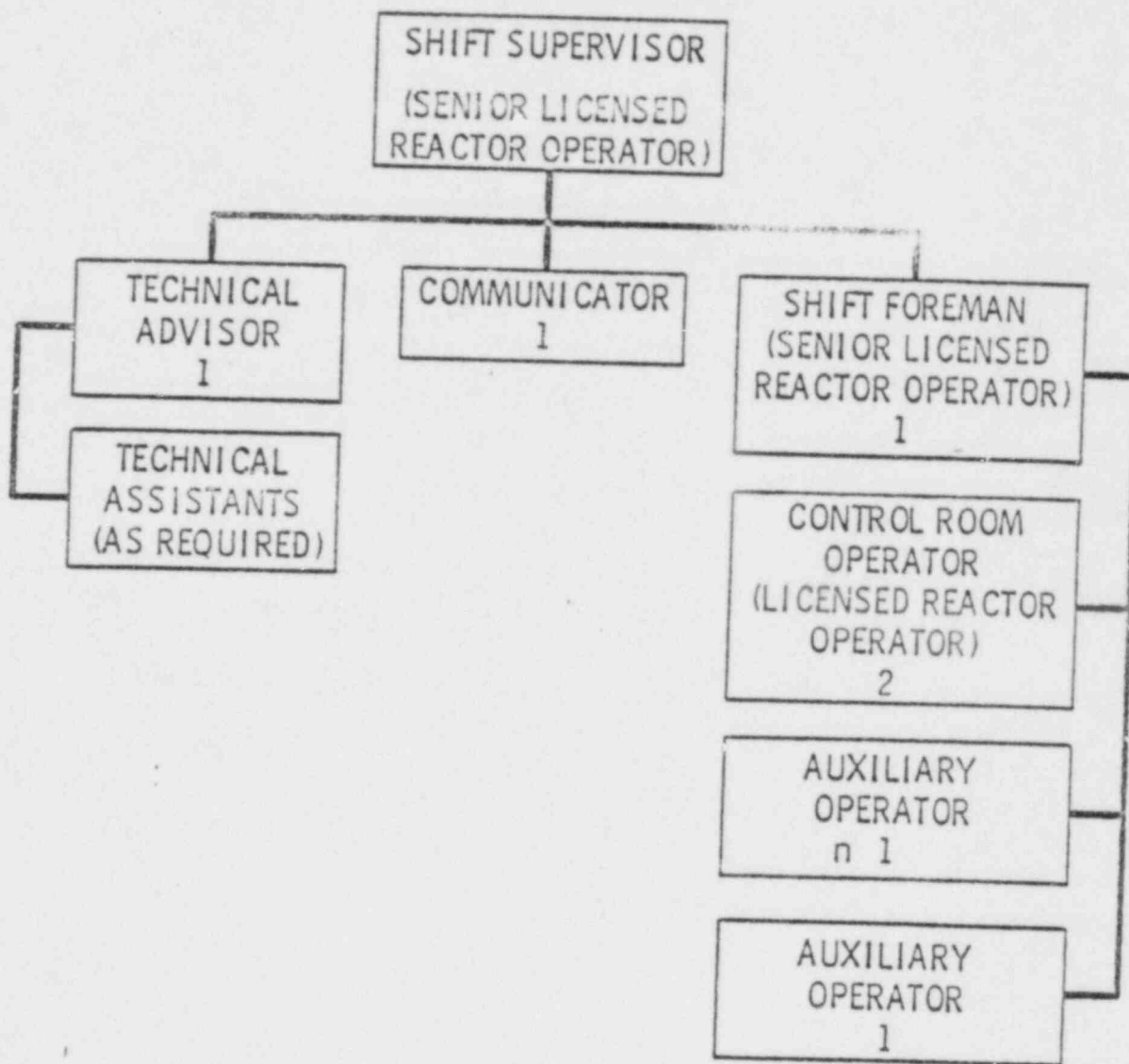
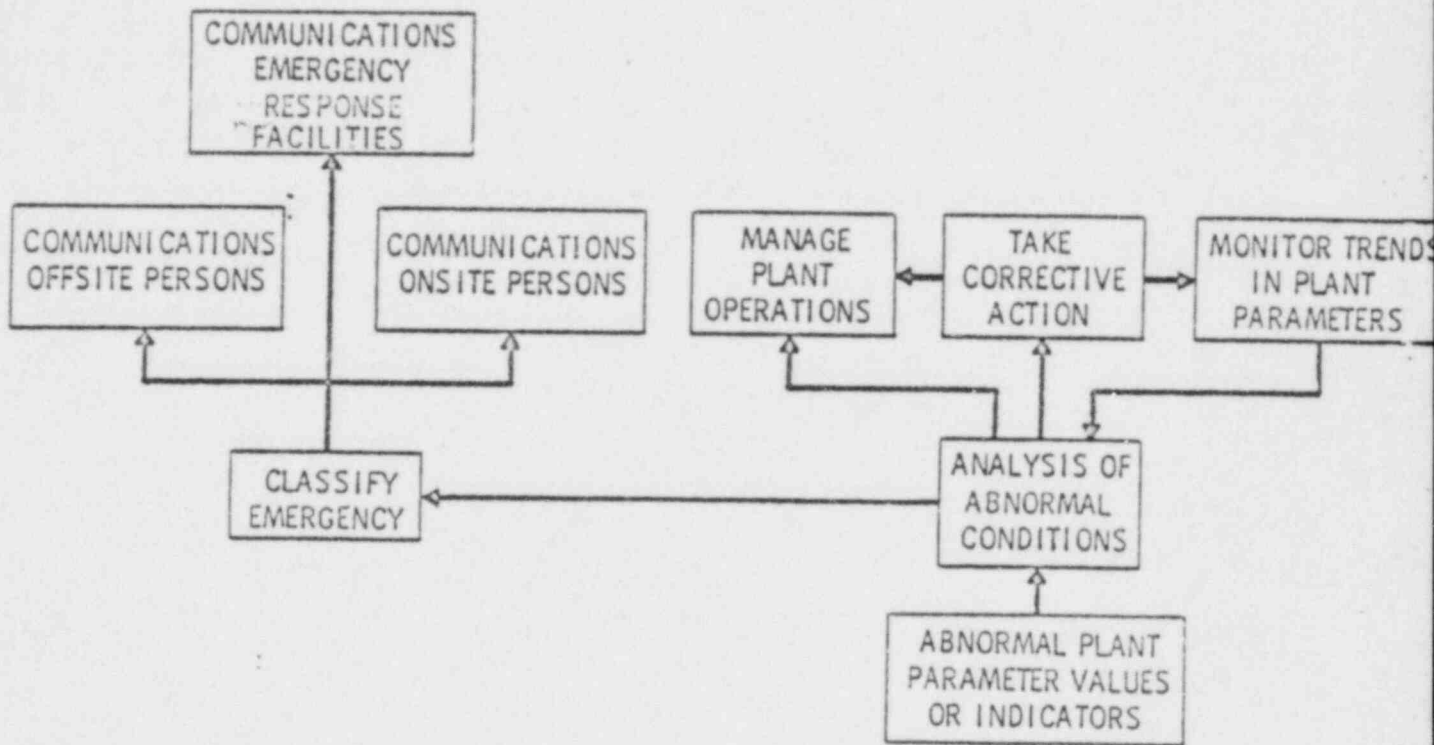


FIGURE 3.1

FUNCTIONAL ORGANIZATION - CONTROL ROOM



FUNCTIONAL UNTIL TSC OPERATIONAL

FIGURE 3.2

4. OPERATIONAL SUPPORT CENTER

4.1 Integration with Overall Planning

1. The design of the Operational Support Center (OSC) addresses the following goals:
 - a. Provides a location where plant logistic support can be coordinated during an emergency, and
 - b. Restricts control room access to those support personnel specifically requested by the shift supervisor.
2. An onsite operational support center is separate from the control room and the TSC and is where licensee operations support personnel will assemble in an emergency.

Where is it located?

Describe the isolation of the OSC from the TSC and control room.

Where are the backup OSC sites and are they accessible (e.g. onsite or nearsite) and habitable?

Will the back-up OSC be habitable if the primary OSC is not?

3. Provision shall be made for an alternate health physics control point. Where is it located?
4. The health physics control point shall be immediately accessible to the OSC. (i.e., will personnel traveling from the OSC to the H.P. control point receive less than 5 rem when combined with other exposures during the course of an accident?)

5. Can personnel access storage facilities without receiving greater than 5 rem (when combined with other exposures) during the course of an accident?

4.2 Habitability

1. No specific habitability requirements are established for the OSC.

Is the OSC as habitable as the control room? Discuss.

Is the shielding comparable to the control room? Discuss.

Is the ventilation comparable to the control room? Discuss.

2. If the OSC habitability is not comparable to that of the control room, procedures shall be available for evacuation of OSC personnel in the event of a large radioactive release.

If OSC has to be evacuated, what are the criteria for evacuation?

Have key people been selected to remain onsite (or nearsite) to continue OSC functions?

Are other personnel, evacuated offsite from the OSC, available to provide additional OSC functions if required?

3. How are radiation levels determined in the OSC?

4. Emergency supplies (protective clothing, respirators, survey meters, dosimeters and KI) shall be available in the OSC for all personnel assigned at the facility.

What alternate supply arrangements have been made?

Where are equipment and supplies stored?

How does OSC staff obtain their equipment? (i.e., is it signed out, just taken, etc.)

4.3 Communications

1. There shall be a direct and dedicated primary communication link with the control room and TSC.
2. Communications with the TSC and control room shall be available at the backup OSC.
3. A dial phone shall be available in the OSC for other onsite and offsite locations.
4. Direct voice intercommunications and/or reliable direct radio communications may be used for supplementing telephone links.

4.4 Staffing

1. Personnel shall be assigned to the OSC or TSC for:

- a. Damage Control
- b. Fire Brigade
- c. First Aid
- d. Radiation Control
- e. Decontamination
- f. Radiological and Environmental Surveys
- g. Maintenance/Repairs
- h. Other Operations Personnel

The utility should have the option of assigning some of these personnel/tasks to the TSC or EOF.

2. When the OSC is activated, it shall be supervised by licensee management personnel designated in the licensee's emergency plan to perform these functions.

Who will be in charge of the OSC?

3. Team leaders shall be assigned for each functional group.

4.5 Size

1. The OSC shall be large enough to accommodate assigned personnel and equipment to be stored in the OSC (e.g. 15 sq. ft. per person for evaluative purposes only).
2. Decontamination facilities should be readily available.

Where are they located?

5. EMERGENCY OPERATIONS FACILITY

5.1 Integration with Overall Emergency Planning

1. The design of the Emergency Operations Facility (EOF) addresses the following goals:
 - a. Management of overall licensee emergency response;
 - b. Coordination of radiological and environmental assessment;
 - c. Determination of recommended public protective actions; and
 - d. Coordination of emergency response activities with Federal, State, and local agencies.
2. The EOF shall be staffed by licensee, Federal, State, local and other emergency personnel designated by the emergency plan.
3. Facilities shall be provided in the EOF for the acquisition, display, and evaluation of all radiological, meteorological and plant system data pertinent to determining offsite protective measures.
4. The licensee shall use the EOF to coordinate its emergency response activities with those of the local, State, and Federal agencies, including the NRC. Licensee personnel in the EOF will assess potential offsite effects and make appropriate protective action recommendations for the public to State and local emergency response agencies. The EOF may be used as a location for information dissemination to the public via the news media by designated spokespersons in accordance with the licensee's emergency plan. Licensee

also may use the EOF as the post-accident recovery management center. Since the specific allocation of functions assigned to emergency facilities will differ from design to design, the proposal should clearly state which functions (Radiological Assessment, Security, Coordination with Offsite Agencies) are assigned to the EOF.

5.2 Location, Structure and Habitability

1. The siting of the EOF should include the following criteria:

- a. Whether the location facilitates carrying out the functions specified for the EOF (i.e., determination of public protective actions to be recommended by the licensee to offsite officials, and coordination of the licensee with Federal, State, and local organizations).

Describe the transportation network in the vicinity of the EOF adequate to assure rapid coverage of the EPZ by monitoring teams.

Is the EOF placed in a location that is readily accessible by road to Federal, State, local government officials as well as the licensee's corporate and site operations personnel?

Has the selection of the EOF location been coordinated with State/local officials?

- b. What radiation doses would be expected when the EOF is accessed during DBA or other specified accident (less than or equal to 5 rem)?

Is the EOF accessible during periods of radiation releases?

Is there an alternate EOF?

2. The EOF must be able to withstand reasonable expected adverse conditions. (e.g., 100 year floods and high winds)

See comment 7 in attached letter.

How would the 100-year water levels and winds affect the operation of the EOF?

3. The EOF shall have a protection factor greater than or equal to five if located within 10 miles of TSC; no protection level is necessary if located beyond 10 miles of the TSC. Protection factor is defined in terms of the attenuation of 0.7 MeV gamma radiation.

5.3 Staffing (NUREG-0696 and PNL TSC/EOF Staffing Study)

1. The EOF shall:

- a. Be functional within one hour of activation;

What equipment takes more than 60 minutes to become operational?

How long does it take to fully staff the EOF?

What is the procedure to ensure notification of the minimum EOF staff?

- b. Include staff to engage in onsite and offsite radiological monitoring and a senior management person to be in charge of all licensee activities in the EOF. An example of additional staffing needs for the EOF are given in Figure 5-1 (from the PNL TSC/EOF Staffing Study.)

- c. Has the licensee identified the tasks that may need to be performed and specified the characteristics (e.g. skills, experience and training) of the persons needed to accomplish these tasks?

See comment 8 in attached letter.

- ~~2. Allocation of tasks to personnel should be validated by an analysis of error likely situations, especially those situations that might exceed the human operator's capability in the areas of perception, memory, information integration and manipulation of controls.~~

See comment 5 in attached letter.

What is the total number of personnel assigned to the EOF? Are there adequate numbers of personnel assigned to the EOF to carry out its function?

EOF ORGANIZATION

See Comment 10 in attached letter

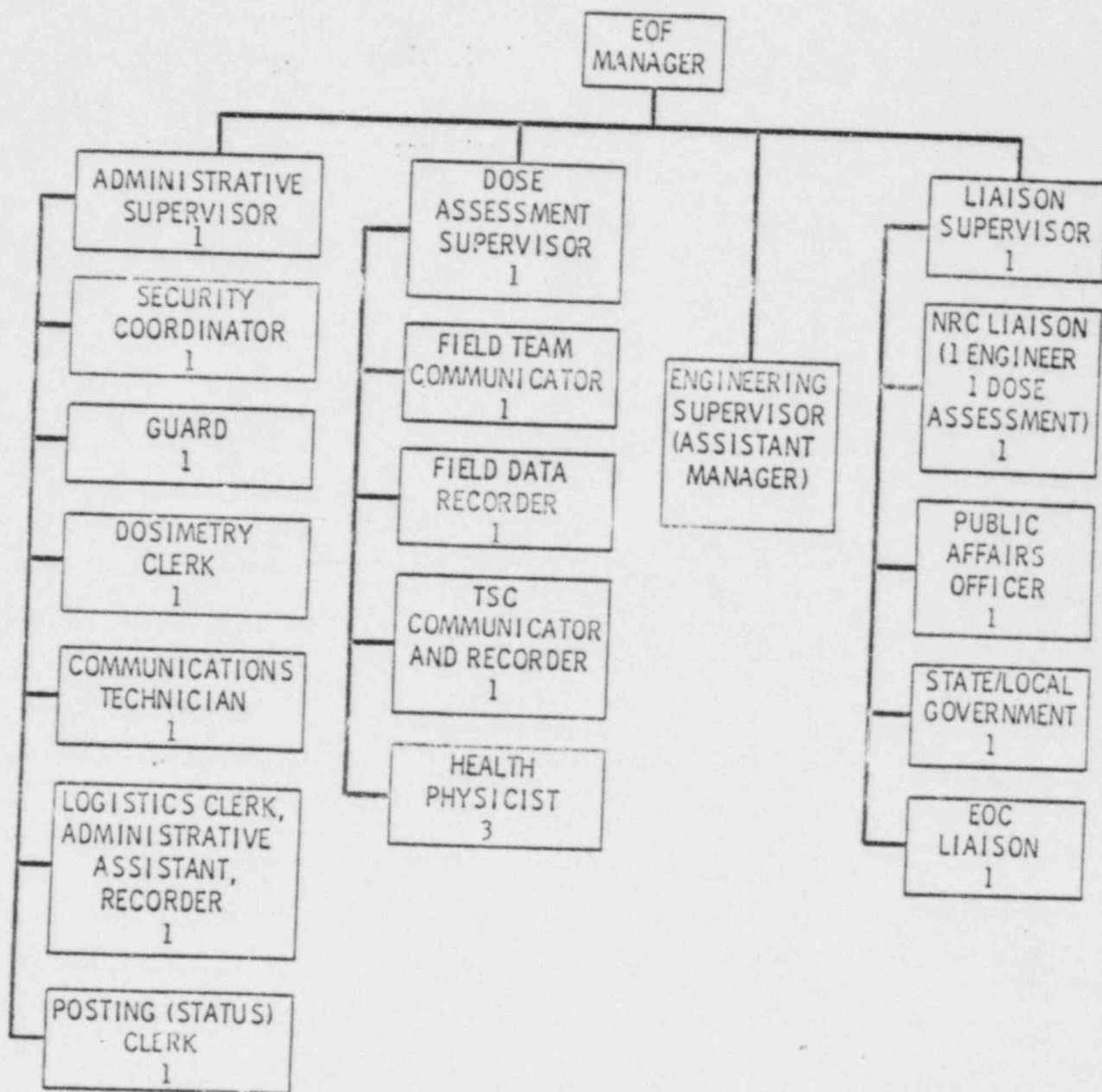


FIGURE 5.2

5.4 Size

1. The EOF building or building complex shall be large enough to provide:

- a. Working space for the personnel assigned to the EOF as specified in the licensee's emergency plan, including State and local agency personnel, at the maximum level of occupancy without crowding (minimum size of total working space provided shall be approximately ~~75~~ sq ft/person); 50

See comment 3 in attached letter.

~~How much space is assigned to each work station?~~

Is an operational sequence diagram provided that describes the interaction among EOF staff, ~~work stations~~ and items of equipment? in the EOF

Is a locational diagram provided that shows where personnel ~~work stations~~ and items of equipment will be placed? Is the scale of the diagram provided?

See comment 4 in attached letter.

Is ~~each work station~~ ^{the EOF} equipped for its function (i.e., manager, liaison, dose assessment, engineering, administration etc.)?

Are personnel grouped by function?

Does ~~each work station~~ ^{the EOF} have sufficient space to carry out its assigned function?

Explain how the location of facilities and equipment is consistent with the patterns of interpersonal interaction and machine utilizations that will take place.

Who needs access to which machines?

What is the flow of information between persons and groups?

Are personnel performing related tasks located adjacent to one another?

Describe the organizations of the ~~work stations~~. Are they organized according to Figure 5.2?

See comment 10 in attached letter.

Describe how the ~~workspaces~~ are designed to control traffic and noise (mechanical and conversational). EOF is

- b. Space for EOF data system equipment needed to transmit data to other locations.

Where is the data displayed?

Are layouts of displays coordinated with working space layouts?

How much space is there for working with maps, diagrams, drawings, etc.

Where are the maps, diagrams, drawings, etc., located?

Is there a description of the characteristics of the machines in the EOF that provides a basis for determining their compatibility with anthropometric guidelines (e.g. Van Cott & Kinkade, Human Engineering Guide to Equipment Design)?

Are the characteristics of the data display devices compatible with anthropometric guidelines?

- c. Sufficient space to perform repair, maintenance, and service of equipment, displays, and instrumentation;

How much space is provided to allow access to back panels for repair?

What spare modules are available?

Is a working station assigned for repair and maintenance?

- d. Space for unhindered access to communications equipment by all EOF personnel who need communications capabilities to perform their functions.

Is there a description of the layout of the telephones in the EOF?

How much space is provided for each telephone (about 1 sq. ft.)?

How can a ringing telephone be easily identified (i.e., do phones light up when ringing)?

- e. Space for ready access to functional displays of EOF data.

Is there space to display maps of the EPZ?

- f. Space for storage of plant records and historical data. Records, data and drawings may be kept in TSC if they can be displayed in the EOF by an automated method of retrieval.

How much work space is dedicated to this task?

- g. Separate office space to accommodate at least five NRC personnel during periods that the EOF is activated.

See comment 9 in attached letter.

How much office space is allocated for NRC use (~~at least 250-375 sq. ft.~~)? 100 sq. ft.

Does this room have a speaker telephone?

2. The EOF working space shall be large enough for at least ~~35~~ persons, including ⁴ 15 ~~25~~ persons designated by the licensee, and 1 person from FEMA. ~~This minimum space shall be increased if the maximum staffing levels specified in the licensee's emergency plan, including representatives from State and local agencies, exceeds 25 persons.~~

See comment 3 in attached letter.

How many people are assigned to the EOF by the Emergency Plan including the NRC personnel and one FEMA person?

Is the workspace adequate for these people to perform their functions?

Are workspaces designed to control noise and traffic and to avoid unintended dissemination of confidential information?

Are provisions made for liaison persons from offsite organizations (if desired by these organizations)?

i.5 Radiological Monitoring

1. The licensee shall provide the EOF with installed radiation monitors or dedicated, portable monitoring equipment.

Are dedicated dose rate instruments, survey meters and airborne radioactivity monitoring instruments assigned to the EOF?

Which instruments will be used?

Where are instruments located?

How many of each?

How were types of, number of, and placement of monitors determined?

What range do these instruments have?

2. These systems shall continuously indicate radiation dose rates, airborne radioactivity concentrations and the presence of radioiodine as low as $1E-7$ microcuries/cc in the EOF.

Is someone assigned to monitor the EOF habitability when radiation releases are taking place?

What are the qualifications of this person?

If not, are there fixed instruments which are equipped with audible and visual alarms?

At what radiation levels will these instruments alarm?

Are unattended instruments in continuous operation?

How is iodine monitored?

Is the detection limit for airborne I-131 as low as $1E-7$ microcurries/cc?

What is the reliability of the continuously operating instruments? (i.e., is there back-up power for the instruments? Do the instruments meet the manufacturers specifications for availability and accuracy? How often are the instruments calibrated?)

3. These monitoring systems shall include local alarms with trip levels set to provide early warning to EOF personnel of adverse conditions that may affect the habitability of the EOF.

What are the trip levels of these instruments?

Does the instrument system provide a warning of precautionary radiation levels in a timely manner to allow the EOF personnel to take protective actions?

4. Does the EOF have a counting room?

What instruments are available in the counting room?

Where are backup counting rooms located?

Is the counting room or receiving room readily accessible to offsite EOF personnel and monitoring teams?

Is the monitoring equipment stored at the EOF? If not, where is it stored?

Supplies of protective clothing, respiratory equipment and KI shall be readily available for all personnel who may need access to the plant or may enter the airborne plume.

Are instructions for the use of KI available?

Are reserves of equipment available in the EOF or some nearby location?

Where?

How is the need for such supplies determined? i.e., when will personnel don respiratory equipment?

Is the protection factor for respiratory equipment equivalent to a full face mask?

5.6 Communications

1. EOF telephone access to commercial telephone common carrier services must bypass any local telephone switching facilities that may be susceptible to loss of power in emergencies.

How many switchboard independent commercial telephone lines are available in the EOF?

2. EOF voice communications must consist of a reliable primary and backup system and include:

- a. Hotline telephone located in the NRC office space (and also in the licensee space if desired by the licensee) on the emergency notification system (ENS) to the NRC Operations Center;

What is the backup system for communications to the NRC?

- b. Dedicated telephone located in the NRC office space (and also in the licensee space if desired by the licensee) on the NRC Health physics network (HPN);

What is the backup system for communication to the NRC?

- c. Dedicated telephones for management communications with direct access to the ICC and the control room;

Do these telephones provide non-interruptable service between EOF and TSC or control room?

- d. Dial telephones that provide access to onsite and offsite locations;

- e. Intercommunications systems between work areas of the EOF, if needed for the EOF functional performance and if the EOF is comprised of separate functional areas;

Is there an intercom to connect the EOF manager and supervisors?

- f. Radio communications to licensee mobile monitoring teams;

Are there provisions to use commercial telephones as a backup?

- g. Communications to State and local operations centers;

What are the primary and backup communications?

Are they diverse, redundant and dedicated?

- h. Communications to facilities outside the EOF used to provide supplemental support for EOF evaluations.

Are there primary and backup communications to corporate HQ?

3. The EOF communication system shall also include designated telephones (in addition to the ENS and HPN telephones) for use by NRC personnel. The licensee shall provide at least two dial telephone lines for such NRC use when the EOF is activated. The licensee shall also furnish the onsite access facilities and cables to the NRC for the ENS and HPN telephones.

4. Facsimile transmission capability between the EOF, the TSC, and the NRC Operations Center shall be provided.

Is facsimile transmission capability installed and tested for compatibility with NRC and offsite authorities?

5. Are there descriptions of how the following communications needs are met?

EOF manager with

- Corporate HQ
- TSC
- Control Room
- NRC
- State Government
- Local Government
- EOF Supervisors

Administrative supervisor with

- Corporate HQ
- TSC Security communication center
- Outside telephone lines
- EOF manager
- Telefax
- Photocopying

Dose assessment supervisor with

- HPN telephone
- TSC
- EOF manager
- Outside line
- Radio to monitoring teams

Engineering supervisor with

- Control Room
- TSC
- Corporate
- Outside lines
- Vendors

Liaison supervisor with

- Corporate HQ
- NRC
- State Government
- Local Government
- TV Monitor (news stations)

5.7 Instrumentation, Data System Equipment,
and Power Supplies

These methodologies are addressed in
Sections 6, 7, 8, and 9.

5.8 Technical Data and Data System

These methodologies are addressed in
Sections 6, 7, 8, and 9.

5.9 Records Availability and Management

1. EOF personnel shall have ready access to
up-to-date records, operational
specifications, and procedures that
include but are not limited to:

- a. Plant meteorological data.

Does the EOF have access to primary
and backup meteorological data?

Are dose assessment procedures
designed to use either data set?

- b. Up-to-date records related to
licensee, State, and local emergency
response plans.

Does the EOF have up-to-date copies
of State, local and Federal emergency
response plans and procedures?

- c. Safety Parameter Display System.

- d. Offsite population distribution data.

- e. Plant technical specifications.

Are specifications, records,
drawings, and reports the current
ones (what are the most current
dates)?

- f. Evacuation plans.

- g. Plant operating procedures.
 - h. Environs radiological monitoring records.
 - i. Emergency operating procedures.
 - j. Licensee employee radiation exposure histories.
 - k. Final Safety Analysis Report.
 - l. Up-to-date, as-built drawings, schematics, and diagrams showing:
 - Conditions of plant structures and systems down to the component level, and
 - In-plant locations of these systems.
 - m. Checklists, guides, worksheets and other job performance aids.
2. These records shall either be stored and maintained in the EOF (such as hard copy or microfiche) or shall be readily available via transmittal to the EOF from another records storage location. The method of storage and presentation of the EOF records shall ensure ease of access under emergency conditions. The records available to the EOF shall be completely updated as necessary to ensure currency and completeness.

How are records stored and maintained in the EOF?

Are records readily available for transmission to the EOF from another storage location?

Are records stored so as to be readily and easily accessible?

How are records updated?

How are the records accessed?

6. Data Acquisition System

6.1 DAS Functional Description

The function of a data acquisition system (DAS) in the context of this methodology document is to provide a basic source of data for all emergency response facilities. A functional block diagram, showing the facilities to be used for data acquisition and their functional interconnection to ERF's and other plant facilities should be provided. Figures 2 and 3 of NUREG-0696 are examples of such diagrams.

6.2 DAS Facilities

It is anticipated that a dedicated data acquisition system, consisting of a single facility or a functionally integrated, physically distributed facility will be proposed for most sites. However, NUREG-0696 does not require that utilities provide specific, dedicated DAS facilities, only that they perform specific data acquisition functions. Some sites may propose to perform DAS functions by sharing other facilities such as the plant process control computer. In either case, any facilities used for the acquisition of any and all data relating to safety parameters and ERF's should address the following areas.

1. DAS Layout

Describe the layout of the DAS. A drawing or photograph of the system(s), showing equipment room layout and operator console(s) may be sufficient.

2. DAS Environment

- a. Where is the DAS located?
- b. What fire protection facilities are provided?
- c. Is the room temperature controlled?

What is the heat output of the equipment?

What is the heat removal capacity of the air conditioning system?

- d. What humidity controls are provided?

- e. Concerning electrical power:

What power sources are available?

What are the DAS power requirements?

Is the source uninterruptable?

What is the backup source?

3. DAS Physical Security and Access

- a. Describe the security procedures which determine who may access DAS equipment.

- b. Identify the authorized personnel.

Can the user stop the system via a normal display device?

Can the user stop the system without entering the DAS resource restricted area or enclosure?

6.3 DAS Equipment Specifications

In order to evaluate the capability of a proposed DAS to acquire and distribute data in a manner consistent with the functional criteria in NUREG-0696, the DAS equipment configuration must be understood in detail. The following questions are to be applied to any subsystem of a dedicated, distributed DAS, as well as to any system which shares DAS functions with other plant functions.

1. Dedicated DAS

What facilities are provided for the acquisition of data to be provided for ERF's?

- a. Specify the computer hardware configuration:

What vendor?

What model number?

What is the processor's computation speed? _____ instructions/sec.

What is the system's configuration?

Number of processors: _____

For each processor or subsystem, indicate the following:

Working storage: _____ bytes.

What type? (core, MOS, etc.)

Error detection and/or correction capability?

On-line disk storage:

Number of controllers: _____

Number of drives: _____

Total capacity: _____ bytes.

Maximum access time: _____ sec.

Minimum transfer rate: _____ bytes/sec.

Tape storage:

Drive type: (7 or 9 track)

Number of drives: _____

Maximum density: _____ bytes/inch.

Speed: _____ inches/sec.

Data Acquisition Hardware:

Number of analog
channels: _____

Sampling rate per
channel: _____ samples/sec.

Resolution per
channel: _____ bits.

Number of digital
channels: _____

Bits per digital
channel: _____

Data communications hardware:

Number of ports: _____

Type of ports: (RS-232,
V35, etc.)

Average data rate per
port: _____ bits/sec.

- b. What software operating system is used?
- c. Will this operating system software be specially modified for use with the DAS? If so, describe the proposed modifications and their justification.
- d. Identify any other software components of the DAS and their source.

2. Additional Requirements for Non-dedicated
DAS

- a. If the plant process control computer, or any other computer facility not fully dedicated to acquisition of data for ERF's, is to be employed, the following information must be understood in addition to that specified in 6.3.1.

What facilities, hardware and software, are included in the configuration to insure that emergency response facility data acquisition functions and other functions do not interfere with and degrade each other?

Does the configuration include dual processors with separate functions?

Do programs and data for the separate functions reside in physically separate working storage and on-line storage facilities?

Does the operating system software provide for the implementation and isolation of separate functional tasks?

What user-callable system services are provided to facilitate non-cooperating, concurrent processes?

How does the operating system deal with conflicting requests for system resources?

What is the system's deadlock avoidance mechanism?

6.4 Sensor Data to be Acquired

1. Plant variables of Type A, B, C, D, and E, as specified in Regulatory Guide 1.97 Revision 2 Table 1(BWR's) or 2(PWR's), are required; identify any exclusions, deviations, or additions and describe the justification for each.
2. Meteorological data described in Regulatory Guide 1.23 Revision 1 is required; identify any exclusions, deviations, or additions and describe the justification for each.

3. For each automatically monitored sensor:

At what location is the data from the sensor physically obtained for the DAS?

Is isolation provided? If so, describe.

Describe the cabling between the sensor and the DAS.

If the sensor signal is not connected directly to a DAS input, describe any and all intermediate circuits and/or equipment.

At what rate is the sensor sampled: _____ samples/sec.

At what resolution is the sensor data read: _____ bits.

4. For any data which is entered by a manual process describe:

The method of entering the data.

The time required to enter the data.

Procedures which have been established for entering the data.

Verification processes used to insure the data has been entered correctly and in a timely manner.

6.5 Data to be Provided for Dose Assessment

NUREG-0696 requires that, in addition to radiological and meteorological data specified in 6.4, the output obtained from a Class A transport and diffusion (dispersion) model, described in NUREG-0654, Revision 1, Appendix 2, be displayed in the EOF. If these transport and diffusion estimates are to be sent to the EOF via the DAS, identify:

The source of these data;

The manner in which these data enter the DAS;

The volume of data generated by the model; and

The rate at which these data are input to the DAS.

7. Data Display Systems

7.1 Functional Display Devices

Data is acquired and processed by the DAS for presentation in the TSC, the EOF, and on the SPDS displays in the control room. A functional description of the display devices used in each of these facilities is required to determine their ability to meet the requirements of NUREG-0696.

1. Displays Required

There must be a minimum of the following display units present in each ERF location.

a. Control Room Displays

The primary SPDS display must be in the control room.

b. TSC Displays

There must be a dedicated mimic SPDS display unit in the TSC.

Since trend information must be displayed, there must be at least one graphical display unit in the TSC. If trend information is not displayed on a graphical display unit, an alternate method of display must be provided and justified.

There must be at least one dedicated terminal available to call up and display data specifically related to TSC functions (i.e., plant system variables other than those included in the SPDS).

There must be at least one terminal dedicated for display of in-plant and offsite radiological variables and meteorological information, for exclusive use in performing EOF functions in the TSC.

There must be at least one hardcopy device available for printing information displayed on the CRT's.

There must be at least one hard copy device capable of displaying graphics information. It is not necessary for the graphics printer to have the resolution or color equivalent of the graphics screen.

If static pictorial records such as area maps, building drawings, component drawings or system diagrams are kept on a computer for call up, a second dedicated graphics display device must be provided for this purpose.

c. EOF Displays

There must be a dedicated mimic SPDS display unit in the EOF.

There must be a dedicated display device for the monitoring function to monitor radiological, meteorological and plant variable data.

If the radiological evaluation function in the EOF is performed with the aid of a computer, there must be a dedicated terminal for this function.

There must be a dedicated display device for obtaining information needed by offsite officials.

Since trending information must be displayed, a graphical display unit is required. This unit could also be used to display graphical data related to offsite dose predictions (i.e., plume dispersion, maps).

If static pictorial records, such as area maps, building drawings, component drawings or system diagrams are kept on a computer for call-up, a second dedicated graphics display device must be provided for this purpose.

If a terminal is used for news media briefings, it must be an additional separate terminal.

There must be at least one hardcopy device available which is capable of printing the displays on the CRT's.

There ~~must~~ be at least one hard copy device capable of displaying graphics information. It is not necessary for the graphics printer to have the resolution or color equivalent of the graphics screen.

2. Display Device Functional Descriptions

For each parameter specified in 6.4 and 6.5 describe:

- a. The information to be displayed at the TSC and the EOF.
- b. The format in which it will be displayed.
- c. The method required to initiate the display of the parameter. (i.e., operator request, continuous display, etc.)
- d. Describe the method for display of trending information.
- e. Describe the method for recall and display of historical data.

3. Display Device Hardware Description

What equipment is provided to display data in the ERF's?

CRT Terminals:

Vendor name / Model Number?

I/O data rates?...

As a minimum CRT screen capacity should be 80 characters by 24 lines. If the screens do not meet this requirement, specify their capacity and the justification for using the smaller capacity.

Define any special function keystroke input to be used.

What is the physical screen size?

Is there control over the character brightness?

If the terminal is intelligent, describe any special features that would be used, and how.

Hardcopy printers:

Vendor name / Model number?

Print rate (lines/minute)?

What is the number of characters per line?

What is the character set available?

Does the printer have graphics capabilities that will be used? If so, what are they and how will they be used?

Is the noise level generated by the printer when it is operating acceptable for the environment in which it is located?

Graphics equipment:

Is the display hardware raster or vector driven?

If the device is vector driven, what is the addressability (number of spatial resolution points on the display screen)? 512 X 256 is the minimum acceptable.

What is the line width of vectors drawn? 0.05 inches is the maximum acceptable.

What is the speed at which vectors are drawn on the screen (full screen vectors or inches per second)? 50 full screen vectors per second is the minimum acceptable.

If the display is a raster device, what is the pixel size and resolution (number of pixels on the screen)?

If the raster device is monochrome, how many levels of gray are available? How many are actually used?

If the device is color, how many different colors may be displayed simultaneously? How many are actually used?

What is the data transfer rate to the device? (specify pixels/second, vectors/second, or bits per second).

Does the data transfer rate support the device's display capability?

What is the refresh display rate of the display device? 30 Hertz is the minimum acceptable refresh rate.

Does the device have hardware vector generation capability?

Does the device have hardware character generation capability?

4. Availability of functional display data to the ERF display systems

- a. What is the maximum response time to queries for information required during an emergency situation? The minimum acceptable response time is three seconds for at least 90% of the queries for information.
- b. If a response takes longer than 2-3 seconds, is the operator informed that the requested operation is in progress?
- c. If the displayed data is inconsistent or faulty, how is this deficiency indicated?

5. Functional Display Format

- a. What is the primary format used for data display? (Actual examples are preferred).
- b. Is the display of sufficient quality and simplicity that it may be seen and understood from the distances required by staff location? Factors to consider:

Is the most important information grouped in the upper-right-hand quadrant of the display?

How are related items of information grouped together on the screen?

How are sub-areas of the display separated?

Does every display page have a header, and are the headers consistent?

If color is used to highlight and differentiate portions of display formats, how many different colors are used and for what purpose is each used?

What other display dimensions (reverse video, size, blinking characters, etc.) are used in the display formats and for what purpose is each used?

6. Operator Interface to System

- a. Can the operator call up optional displays with simple word or keystroke commands? Some examples of commands should be provided.
- b. What is the maximum time required to enter a request for information? (30 seconds should be the maximum time).
- c. What are the levels of expertise needed to operate the system?

7. Functional Display Position

- a. What is the number of displays in each facility (TSC and EOF)?
- b. What is the position of each display device in the room?
- c. What is the maximum number of people who must view the display in an emergency situation?
- d. What are the distances and angles at which the display must be viewed?
- e. Are there any room illumination controls which must be utilized for proper viewing of the display devices?

7.2 SPDS

1. Availability of safety parameter data for the SPDS displays

What are the safety parameters available to the SPDS?

Are there any times when any such parameters are unavailable?

2. Recognizability of the SPDS display

What features of the SPDS display distinguish it from the other displays and devices in the ERF and control rooms?

3. SPDS Location

- a. Describe the location of the SPDS displays in the ERF's and control room.

- b. How does the location of the SPDS insure that it can be easily accessed by the staff members requiring the safety information displayed?

- c. Is the SPDS physically compatible with the existing facilities?

- d. Does the SPDS present a hazard or obstacle to normal operation of the ERF?

4. SPDS Staffing

The SPDS should require no staff in addition to that necessary for the operation of the ERF. How does the design of the SPDS insure that this is the case?

7.3 Other Display Devices

If display devices other than those required by NUREG-0696 (EOF, TSC, and SPDS) are connected to the DAS, what are these devices and their degree of impact on DAS performance.

8. Data Communications

8.1 Description

1. Provision must be made for adequate and reliable transfer of data among the components of the Data Acquisition System, and between the Data Acquisition System and the:

Technical Support Center

Emergency Operations Facility

Safety Parameter Display System displays

Nuclear Data Link communications equipment

Meteorological Data Facility

2. Provision must also be made for access to meteorological data in the DAS by the NRC Operations Center, and certain state and local agencies, if this service is not provided by facilities other than the ERF.
3. Block diagrams should be provided to show these data paths and the methods of transmission employed.

8.2 General

1. Is the link capacity sufficient for the maximum required rate of transmission?
2. Can all of the data channels meet the 0.01 unavailability requirement as defined in NUREG 0696, Section 1.5, under all conditions above cold shutdown?
3. Is all powered data communications equipment on an uninterruptible power supply?
4. How are the data channels protected from unauthorized modification?

5. Are all data channels, plus equipment spares, tested as part of the periodic testing program?

8.3 Added Questions for Data Links Using EIA Standard Interfaces

1. Do the voltage levels and impedances conform to the standard?
2. Does the data rate adhere to the standard for the distance spanned?
3. Are cables and connectors appropriate to the standard?

8.4 Added Questions for Voice-Frequency Links

1. Is error detection and correction provided, if not otherwise supplied by the protocol?
2. What provision is made for testing the voice-frequency segments?
3. Is the data rate within the specification for the modems for the distance spanned?
4. Are spare modems stored on site?
5. Are there redundant data links, physically separate and without common failure mode, in all locations where there is a reasonable probability of service failure?

8.5 Applicable Standards

Typical standards that may be specified for serial data and control signal transmission are:

EIA Standard RS-232-C. "Interface between data terminal equipment and data communication equipment employing serial binary data interchange." August 1969.

FED-STD 1020. "Electrical characteristics of balanced voltage digital interface circuits." September 1975.

FED-STD 1030. "Electrical characteristics of unbalanced voltage digital interface circuits." September 1975.

EIA Standard RS-422-A. "Electrical characteristics of balanced voltage digital interface circuits." December 1978.

EIA Standard RS-423-A. "Electrical characteristics of unbalanced voltage digital interface circuits." September 1978

EIA Standard RS-449. "General purpose 37-position and 9-position interface for data terminal equipment and data circuit-terminating equipment employing serial binary data interchange." November 1977.

9. System Support Requirements

9.1 Documentation

1. Describe the location where documentation is stored and the personnel who require access to this documentation. The minimum documentation to be included must be a user or operators manual, functional system documentation, hardware documentation and software documentation.

2. User Documentation

a. Is there an operator's manual or its equivalent for each display device or facility that is adequate to explain the use of the display as well as instructions for resolving problems?

b. Does the documentation must include as a minimum:

Table of Contents that is well indexed for easy reference?

Description of how to use the manual?

System startup procedure?

System failure procedure?

Reference to support services (both hardware and software)?

Operating instructions for each piece of equipment?

Operating instructions for each request the user may initiate and response to be received?

References to other subsystems and documents?

c. Is the user documentation self supporting such that no other documentation is necessary to operate the system?

- d. Does the user documentation contain guidance on the limitation of instrument readings and their reliability following serious accidents?

3. Functional System Documentation

- a. What documentation describes in detail the DAS, the communications systems and the display systems from a functional perspective, as well as the means of implementation?
- b. Does this documentation have reference to all documentation for subsystems which interface to the DAS, communications equipment, and display systems?

4. Hardware Documentation

- a. What hardware documentation provides information for the engineers or technicians other than the system designer to maintain the system?
- b. Does this hardware documentation include:
 - Theory of Operation?
 - Mechanical Prints?
 - Electrical Prints?

5. Software Documentation

- a. What documentation is available to maintain and evaluate the software?
- b. What procedures are to be followed to insure that the code contains sufficient comments for efficient maintenance and verification of the software?

6. Documentation Update Procedure

- a. What procedure which has been established for maintaining the manuals and other necessary documentation to assure that any changes in the DAS, communications system or display systems are reflected in this documentation.
- b. Who will be responsible for the updates?

9.2 Training

Training for operators and maintenance personnel must be provided.

1. User Training

- a. How will operators of display systems be trained?
- b. Who will perform this training?
- c. What review of the training procedure will be followed to respond to changes in the systems?

2. Maintenance Training

- a. How will the maintenance personnel responsible for the DAS, communications equipment and display devices be trained?
- b. How will the training of personnel be verified?

9.3 Quality Assurance

1. Software Verification/Validation

- a. What verification or validation plan has been developed for the software for the DAS and display systems?

- b. Does the test plan outline procedures for testing the following error types?

Logic Errors

Documentation Errors (especially in the User documentation)

Overload Errors

Timing Errors

Throughput and Capacity Errors

Fallback and Recovery Errors

- c. Does the test plan specify the overall test and integration philosophy, strategies, and methodologies to be employed?

- d. Who will perform the independent quality assurance function?

- e. Is there an adequate method to verify that there is a correlation between output data from the DAS and readings observed by the operators in the control room? Describe this method.

A string test from the individual sensor through the necessary processors and cables to the data output device shall be a part of this method.

2. Hardware Verification/Validation

- a. What is the verification or validation plan for the hardware necessary for the DAS, communications equipment and display systems?
- b. Who will perform the independent quality assurance function on this hardware?

3. System Log

- a. Will a system log be maintained?
- b. Minimum information in this log should be:

All system modifications

All system failures including time, reason and resolution

All planned outages

9.4 Reliability

NUREG-0696 specifies that data systems, instrumentation, and facilities of ERF's shall operate with an unavailability factor of 0.01, be down no more than 16 hours per calendar quarter, and be restorable within 30 minutes whenever the reactor is above cold shutdown status. Furthermore, any equipment affecting SPDS shall operate with an unavailability factor of 0.2 during cold shutdown. In order to determine if DAS equipment, display devices, and communication equipment meet this criterion, the following must be reviewed:

- a. For each of the following sub-systems:

DAS equipment,
Functional display devices,
SPDS display devices, and
Communications equipment,

review the following:

What is the claimed mean time between failures?

What is the claimed mean time to repair?

What is the vendor's recommended preventive maintenance schedule?

What backup systems or components are provided?

- b. How are these claims justified? (Valid examples include historical equipment, vendor provided records of longterm test runs, and records of acceptance tests run on the proposed equipment.)

9.5 Maintenance

In order to insure that the data systems, instrumentation, and facilities of ERF's meet the unavailability requirement the following minimum hardware and software maintenance requirements should be reviewed.

1. Hardware Maintenance

- a. What is the hardware maintenance plan?
- b. How does the plan work to assure minimum unavailability?
- c. Concerning maintenance personnel:

What personnel are identified for the DAS, communications equipment and display systems?

Where are these personnel located?

How are the personnel qualified for the hardware they will be working with?

- d. Concerning spare parts:

Where are spare parts located for minimum practical replacement time?

Where are critical items located on-site?

If spare parts are to be supplied by outside sources, what is the maximum availability delay that can be assured?

Is the quality of the spare parts equivalent to the original equipment?

- e. Is maintenance support equipment available on demand?

f. What is the schedule and procedure for calibration and verification of test equipment?

2. Software Maintenance

a. What is the software maintenance and re-verification plan?

b. Who will maintain the software for the DAS and display systems?

c. What is the procedure for providing adequate qualified backup software maintenance personnel?

d. What is the DAS update procedure?

Does this procedure insure that:

Changes to the software are authorized?

Any changes to the software are adequately tested and validated before they are implemented?

A description and date of the change have been recorded in a manner which can be easily reviewed?

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*Available for purchase from GPO Sales Program, Division of Technical Information and Document Control, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555 and/or the National Technical Information Service, Springfield, VA 22161.

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