

SEP 17 1982

MEMORANDUM FOR: Dr. Paul S. Shewmon, Chairman
Advisory Committee on Reactor Safeguards
FROM: William J. Dircks
Executive Director for Operations
SUBJECT: CONTROL ROOM HABITABILITY

In your letter of August 18th, the Advisory Committee on Reactor Safeguards reported to Chairman Palladino the results of its deliberations on control room habitability. The letter noted numerous allegations related to deficiencies in the maintenance of engineered safety features intended to assure habitability of control rooms at operating plants, examples of inadvertent degradation of the leak-tightness of control rooms, errors in design and installation, and inadequacies in personnel training and use of information resources. These concerns relate to both the licensing process (including technical specifications), and to the inspection process. Implementation of the committee's recommendations could involve significant changes in regulatory requirements and, therefore, must be carefully considered. We propose to evaluate these recommendations and to report to the committee our plans for control room habitability improvements.

Many operating plants received their licenses prior to the full development of current requirements for control room habitability system designs. The scope of the present staff review, pursuant to the General Design Criteria (4 and 19) of 10CFR 50, Appendix A, is manifested primarily in Standard Review Plan sections 6.4 and 9.4.1. A TMI-related (NUREG-0737 Item III.D.3.4) action has required many licensees to propose modifications needed to meet current design requirements. In many cases reviewed to date, these modifications will involve substantial and costly redesign and installation efforts. The committee's findings and recommendations are potentially timely for the use of this multi-plant action as a vehicle to remedy habitability system design deficiencies. The committee's detailed recommendations, however, consider possible additions to current regulatory requirements whose safety significance has not been evaluated by the staff, and that can result in increased demands upon staff and industry resources for implementation.

The contribution of the degradation of control room environment to public risk has not been established. It is not perceived to be high, however, in large part due to the provision of auxiliary shutdown panels and the TMI-related removal of many diagnostic and accident management functions from the control room to the technical support center. We concur with the committee's opinion, however, that the prevention of causes of impaired performance by licensee personnel under accident situations is sufficient motive for careful consideration of potential regulatory action.

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Although the staff participated in the subcommittee and full committee meetings on control room habitability, it was unaware of many of the concerns identified in the committee letter. As a result the staff is unable to respond quickly while still giving the committee's concerns due consideration. Therefore, we propose to present to the committee, by the end of the calendar year, interpretations of each of their recommendations and proposed plans for implementing any which are considered to require regulatory action. This period of time will permit us to evaluate each proposal, its safety significance, resource requirements, and to evaluate steps to correct potential deficiencies. Any staff proposed requirements would, of course, be submitted to the Committee for Review of Generic Requirements for its review and approval.

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
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*See previous concurrence

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DATE	9/8/82	9/8/82	9/8/82	9/8/82	9/9/82	9/11/82	9/8/82

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William J. Dircks
Executive Director for Operations

cc: Commissioner Gilinsky
Commissioner Ahearne
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