



May 22, 1992
LD-92-070

Docket No. 52-002

Mr. Jack W. Roe
Office of Nuclear Reactor Regulation
Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: System 80+™ Human Factors Engineering Review Criteria

Dear Mr. Roe:

On May 19, 1992, NRC staff met with ABB-CE to discuss the development of criteria for review of Human Factors Engineering (HFE) aspects of the control room. ABB-CE presented its views on the similarities and differences between the draft HFE process proposed by the staff and that proposed by ABB-CE. The meeting resulted in an ABB-CE commitment to provide, by July 1, a document on proposed review criteria for the HFE process and design features being developed for Nuplex 80+™. This document would then be reviewed by NRC during July and comments resolved during August. The goal is to develop a consensus on the criteria for HFE review of Nuplex 80+ by September 1, which corresponds approximately to the date for release of the System 80+ draft Safety Evaluation Report (DSER). It is anticipated that, subsequent to issuance of the DSER, emphasis could be then placed on resolution of compliance issues (vs. criteria issues).

The incorporation of HFE review criteria into the DSER as an appendix was also discussed. ABB-CE agrees that documentation of review criteria is necessary and that including such documentation in an appendix to a Safety Evaluation Report (SER) is appropriate since issuance of a Standard Review Plan revision would require a significant amount of time. We do not agree, however, that inclusion of an early draft of NRC's "HFE Program Review Model and Acceptance Criteria" document in the draft SER is appropriate. ABB-CE has significant concerns on the applicability of the current version of that document to the review of Nuplex 80+ and, as such, it is considered to be only a "first cut" document which is not acceptable for publication. There has not been sufficient time for interaction with ABB-CE to resolve differences and we believe that publication is premature without further input from ABB-CE.

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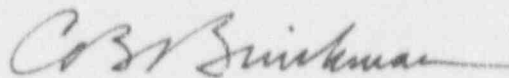
ABB-CE requests, therefore, that consideration be given to resolving this concern. At least two options are available. The first would be to not publish any HFE review criteria in the DSER, but wait until ABB-CE's input is received and differences resolved, to the extent practical. The criteria could then be published in the final SER. The second option would be to publish in the DSER two sets of criteria in separate appendices: one appendix oriented towards process review (that document currently being developed by NRC) and the other appendix oriented towards review of product as well as process. The second appendix would be the Nuplex 80+ HFE review criteria document currently being drafted by ABB-CE. This document, with NRC revisions if desired, could be included in the DSER after NRC's review this July. Prior to July, a placeholder could be inserted to notify internal reviewers that the appendix will be added before the DSER is released.

In any case, the text of the DSER should clearly state that work is continuing with ABB-CE through public meetings to converge on the set of criteria to be used for the review of Nuplex 80+.

If you have any questions, please call me or Mr. Stan Ritterbusch at (203) 285-5206.

Very truly yours,

COMBUSTION ENGINEERING, INC.



C. B. Brinkman
Acting Director
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CBB/ser

cc: J. Trotter (EPRI)
T. Wambach (NRC)