

FEB 27 1985

Docket Nos: 50-424
and 50-425

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Dear Mr. Foster:

Subject: Transmittal of Comments on Detailed Control Room Design Review for Vogtle, Unit 1

Enclosed are comments on the Vogtle Detailed Control Room Design Review (DCRDR) Program Plan submitted to the staff by letter dated September 14, 1984. As the comments indicate, the staff is concerned that if the Vogtle DCRDR is carried out as presently planned, all the requirements of NUREG-0737, Supplement 1 may not be met.

You should address the conclusions in our consultants' report by March 15, 1985, in order to support issuance of the SER. The staff will perform audits as necessary and review your Summary Report scheduled for submittal in March 1986 to confirm your previous commitments. The staff is interested in performing an in-progress audit of your DCRDR in early May. The project manager, Melanie Miller, will contact your staff to arrange the audit. She may be contacted at (301) 492-4259 if there are any questions.

Sincerely,



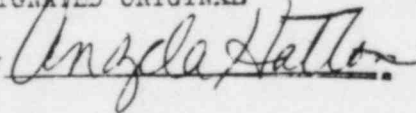
Elinor G. Adensam, Chief
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Enclosure:
As stated

cc: See next page

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Certified By



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Enclosure 1

STAFF COMMENTS
ON THE VOGTLE UNIT 1
DETAILED CONTROL ROOM DESIGN REVIEW
PROGRAM PLAN

BACKGROUND

Licensees and applicants for operating licenses shall conduct a Detailed Control Room Design Review (DCRDR). The objective is to "improve the ability of nuclear power plant control room operators to prevent accidents or cope with accidents if they occur by improving the information provided to them" (NUREG-0660, Item I.D.). The need to conduct a DCRDR was confirmed in NUREG-0737 and Supplement 1 to NUREG-0737. DCRDR requirements in Supplement 1 to NUREG-0737 replaced those in earlier documents. Supplement 1 to NUREG-0737 requires each applicant or licensee to conduct a DCRDR on a schedule negotiated with the Nuclear Regulatory Commission (NRC).

Georgia Power Company (GPC) submitted a DCRDR Program Plan for Vogtle Unit 1 by letter dated September 14, 1984. The Program Plan was reviewed against the requirements of Supplement 1 to NUREG-0737 and the additional guidance provided in NUREG-0700 and NUREG-0800. Consultants from Lawrence Livermore National Laboratory assisted the staff in the review. The results of their review are enclosed. The staff agrees with the technical content and conclusions of the contractor's report.

The Program Plan for Vogtle Unit 1 does not indicate that the equipment and tasks necessary for remote shutdown will be included in the scope of the Vogtle Unit 1 DCRDR. The staff recommends that a human factors evaluation of the remote shutdown capability be conducted in order to meet 10 CFR Part 50, Appendix A, GDC 19 and 10 CFR Part 50, Appendix R to assure an adequate scope of the DCRDR. To the extent practicable, without delaying completion of the DCRDR, the NRC staff recommends that the DCRDR address any control room modifications and additions (such as controls and displays for inadequate core cooling and reactor system vents) made or planned as a result of other post-TMI actions, as well as the lessons learned from operating reactors events such as the Salem ATWS events. Implications of the Salem ATWS events are discussed in NUREG-1000 and required actions are described in Section 1.2, "Post Trip Review - Data and Information Capability," of the enclosure to Generic Letter 83-28.

CONCLUSIONS

From its review of the Vogtle Unit 1 Program Plan, the staff identified several concerns which are summarized below. A more detailed discussion is provided in the attachment to this report. The staff plans to perform an in-progress audit at the site to discuss and clarify details of the Vogtle Unit 1 DCRDR.

Review Team The qualifications and multidisciplinary nature of the review team appear acceptable. There is a concern that the normal duties of the senior members could limit their participation in the DCRDR process.

Function and Task Analysis The Program Plan does not indicate how modifications made to the generic ERGs in order to develop plant specific EOPs are factored into the task analysis. In addition GPC did not include the station blackout or the review of the remote shutdown panel. It is recommended that these be included in the scope of the function and task analysis. Although the "Task Analysis HED Principles" address functional requirements of control room equipment, the Task Analysis Work Sheets do not provide for documentation of requirements such as range, accuracy, trending capability, and operability under accident conditions. GPC should address the above mentioned concerns in the Summary Report.

Comparison of Display and Control Requirements with a Control Room Inventory.

The requirements/inventory comparison must be based upon specific plant emergency information and control needs and not only on the ERGs. In addition there is a lack of documented listing of specific functional requirements from the function and task analysis. GPC must resolve the above items to meet the requirements.

Control Room Survey

The control room survey based entirely on INPO 83-042 will not identify all human engineering deficiencies (HEDs).

GPC must address how the NUTAC guidelines will be supplemented so that areas insufficiently addressed by the NUTAC guidelines or deferred to other review processes will be accounted for in the DCRDR.

Assessment of HEDs

The GPC submittal does not contain enough details to allow the staff to determine if the assessment process meets the requirements. Clarification should be provided by March 15, 1985.

Selection of Design Improvements

GPC should describe the criteria to be used in the selection of design improvements to enable the staff to determine if the process is adequate.

Verification of Design Improvements

The verification process appears adequate. However, GPC must ensure that the improvement reviews will generate auditable documentation.

Coordination with Other Programs

The coordination plan is acceptable.

As stated above, the staff plans to conduct an in-progress audit to review and clarify certain aspects of the planned DCRDR process and available documentation, observe the specific criteria and methods used by Georgia Power to perform the review, and evaluate conformance with the requirements of Supplement 1 to NUREG-0737.