

## **REQUEST FOR ADDITIONAL INFORMATION REGARDING THE REVIEW OF HUMAN FACTORS ENGINEERING FOR THE ORANO ENRICHMENT USA PROJECT IKE FACILITY**

The U.S. Nuclear Regulatory Commission staff developed the following request for additional information (RAI) regarding the human factors engineering (HFE) review of the Orano Enrichment USA, LLC Project IKE facility License Application (LA).

### **HFE-RAI-1: Human Factors Engineering Program Plan**

#### **Regulatory Requirement:**

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) 70.61(e) requires that the safety program, established and maintained pursuant to 10 CFR 70.62 of 10 CFR Subpart H, shall ensure that each item relied on for safety (IROFS) will be available and reliable to perform its intended function when needed and in the context of the performance requirements of 10 CFR 70.61.

The regulation in 10 CFR 70.64(b)(2) requires that the facility and system design and facility layout be based on defense-in-depth practices, including features that enhance safety by reducing challenges to IROFS.

#### **Description of Issue:**

Section 3.5, "Human System Interface (HSI) Design," of the LA focuses on the HSI design. However, it does not identify personnel activities such that the reviewer can understand the human actions required, the HSIs involved, and the potential consequences. Orano did not provide an HFE Program Plan that describes the methodology and/or implementation plan for the proposed personnel activities that are considered IROFS, consistent with the findings of the integrated safety analysis, and personnel activities that support safety (e.g., maintenance) to ensure that each IROFS will be available and reliable to perform its intended function when needed.

An HFE Program Plan is intended to provide reasonable assurance that the applicant has appropriately applied HFE to personnel activities such that the potential for human error in facility operations was addressed during the design of the facility. The HSI design process is only one part of a comprehensive HFE Program.

#### **Information Needed:**

Provide a detailed description of Orano's HFE Program Plan.

Enclosure