

1/16/03 - memo to Paul & A's

In addition, the staff considered the guidance on manual actions contained in ANSI/ANS Standard 58.8 (1994), "Time Response Design Criteria for Safety-Related Operator Actions." This standard contains criteria that establish timing requirements for use in the design of safety-related systems for nuclear power plants. The objective of the criteria is to determine whether sufficient time exists for safety-related systems to be initiated by operator action or whether automatic actuation is required. The standard's scope "is limited to safety-related operator actions associated with design basis events (DBEs) that result in a reactor trip and are required to be analyzed in safety analysis reports (SARs)." The staff considers this industry consensus standard relevant to the proposed rulemaking but not as a replacement for it. The standard's expressed scope is for the design of safety-related equipment and DBEs. In the staff's opinion, application of this standard to address fire protection manual actions is outside the intent and scope of the standard. However, the principles and methods contained in the standard may be adaptable to the proposed rulemaking and will be considered as part of the staff's effort to develop generic manual action acceptance criteria.

The staff is also aware of NRC draft guidance to review license amendments that contain risk-important human actions. The staff issued NUREG-1764, "Guidance for the Review of Changes to Human Actions" as a draft report for public comment with the public comment period closing March 31, 2003. This NUREG proposes a risk-informed methodology for the staff to use in their review of the human performance aspects of proposed changes to plant systems and operations that are submitted to the staff as licensee amendment requests. In addition to using risk insights to determine the level of regulatory review that the staff should perform on licensee submittals containing human actions, the NUREG provides deterministic review criteria for evaluating the acceptability of human actions proposed by licensees. The staff will consider using the risk-informed approach presented in this NUREG, particularly the deterministic review criteria, during the rulemaking process.

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