

RULES AND OBJECTIVES
BRANCH
USNRC

As of: 9/26/17 11:25 AM
Received: September 21, 2017
Status: Pending_Post
Tracking No. 1k1-8ysq-zhgy
Comments Due: September 21, 2017
Submission Type: Web

PUBLIC SUBMISSION

2017

2017 SEP 26 AM 11:34

Docket: NRC-2017-0181

Identifying and Reporting Human Performance Incidents

RECEIVED

Comment On: NRC-2017-0181-0001

Identifying and Reporting Human Performance Incidents; Draft Regulatory Issue Summary for Comment

Document: NRC-2017-0181-DRAFT-0003

Comment on FR Doc # 2017-17678

Submitter Information

Name: Greg Cameron

Organization: Nuclear Energy Institute

8/20/2017

82FR 39915

General Comment

See attached file.

2

Attachments

09-21-17_NRC_NEI Comments on Draft RIS 2017-xx IDENTIFYING AND REPORTING HUMAN PERFORMANCE INCIDENTS

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

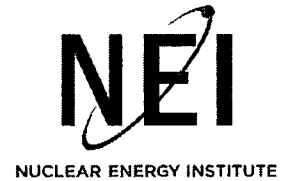
Add= C. Franklin (CMF3)

A. Schwab (AHS1)

GREGORY R. CAMERON

Senior Project Manager, Regulatory Affairs

1201 F Street, NW, Suite 1100
Washington, DC 20004
P: 202.739.8105
grc@nei.org
nei.org



September 21, 2017

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Comments on Draft Regulatory Issue Summary (RIS) 2017-XX, *Identifying and Reporting Human Performance Incidents*, 82 FR 39915, Docket ID NRC-2017-0181

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on the subject RIS 2017-XX, "Identifying and Reporting Human Performance Incidents," as requested in the subject Federal Register Notice.

The industry takes seriously any plant events which require a Licensee Event Report (LER) in accordance with 10 CFR 50.73, including those events which involve aspects of human performance as a root or contributing cause. Depending on the complexity or severity of the event, plants utilize a variety of evaluative tools to understand the impact of human performance and take corrective actions as necessary.

The industry shares the results of these evaluations openly with the NRC not only by inclusion in the LER but also by providing other documents and discussions in order to support the agency's review of these matters.

The draft RIS appears to set a new standard for the level of information required in LERs to support the Human Factors Information System without sufficient justification. The RIS relies on just two examples and identifies the need for additional information in only one (labeled "Example Two" in the RIS). Example Two

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Ms. Cindy K. Bladey
September 21, 2017
Page 2

describes an event with a procedural deficiency as a root cause, and the associated LER provides a detailed narrative of those procedural deficiencies and corrective actions. Personnel error is not a root cause of this event; human performance-related contributing causes are "discussed as appropriate" in accordance with the requirements of NUREG-1022, "Event Reporting Guidelines: 10 CFR 50.72 and 50.73".

Example Two should be removed from the RIS and replaced with a more applicable event with a human performance-related root cause. Furthermore, the NRC should re-evaluate the need for a RIS which is only supported by one example of inadequate information.

It is important to note that LERs are reviewed and closed by resident and regional inspectors with full access to supporting evaluations and documents used as source material for the LER. Closure of the LER indicates that an acceptable level of information has been provided. The draft RIS may be interpreted to create new expectations or an additional level of review without justification.

We encourage the NRC to reconsider the need for this draft RIS given the lack of applicable examples of inadequate performance and the sufficiency of existing information available to the agency as part of the LER review process. If you have any questions concerning these industry comments, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory R. Cameron", with a long horizontal flourish extending to the right.

Gregory R. Cameron