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February 17, 1984

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In the Matter of
Carolina Power & Light Company and North
Carolina Eastern Municipal Power Agency
(Shearon Harris Nuclear Power Plant, Units 1 and 2)
Docket Nos. 50-400 and 50-401 OL

Administrative Judges Kelley, Bright and Carpenter:

In accordance with counsel for Applicants' letter to the Board dated January 31, 1984, enclosed is a document describing generally the consideration given to good human factors engineering principles in the design of the SHNPP Technical Support Center ("TSC"), which is the subject of Mr. Eddleman's proposed Contention 157. Additional information regarding human factors engineering considerations is contained in the materials referenced in this document.

While Applicants have prepared the enclosed documentation pursuant to the request of the Board, Applicants are constrained to note that NUREG-0737, Supplement 1 does not require the submittal of any documentation of the consideration given to human factors engineering in the design of a TSC. Applicants have recently confirmed their understanding on this matter with the NRC Staff. */

Accordingly, Applicants reiterate that proposed Contention 157--premiered, as it is, on the Harris onsite emergency plan--is wholly lacking in basis. See "Applicants' Response To Eddleman Proposed Contentions on Harris Emergency Plan" (July 11, 1983), at 29-30. In support of his contention that Applicants had not designed the

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Administrative Judges Kelley, Bright and Carpenter
February 17, 1984
Page Two

TSC in accord with good human factors engineering principles, Mr. Eddleman argued only that the Harris plan "does not mention human factors engineering with respect to TSC" and does not otherwise indicate that human factors engineering principles have been considered in the design of the TSC. To the contrary, as Applicants pointed out, section 3.3.1 of the plan ("Technical Support Center (TSC) -- Characteristics") expressly provides that the TSC has been "[d]esigned taking into account good human factors engineering principles." Proposed Contention 157 should therefore be rejected.

Respectfully submitted,

Dale E. Hollar

Dale E. Hollar
Associate General Counsel

DEH:ew
cc: Service List attached

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The Board may have been led to believe otherwise by the Staff's recommendation, in its response to proposed Contention 157, that the contention be deferred pending submittal to the NRC of Applicants' "human engineering documents." Compare "Memorandum and Order (Ruling on Wells Eddleman's Proposed On-Site Emergency Planning Contentions)" (November 1, 1983), at 6, with "NRC Staff Response To Wells Eddleman's Contentions Dated May 2, 1983 Pertaining To Applicants' On-Site Emergency Plan" (July 11, 1983), at 6-7.