

To: Robert B. Fuld/CENSYS/USNUS/ABB @ ABB_USSEV_IMS@ABB_NOTES
cc:
From: JJK1 @ nrc.gov@usinet @ ABB_NOTES
Date: 01/27/97 07:24:46 AM
Subject: DG-1052 Comments -Reply

Bob,

Just to get things into the system more officially, as the footnote on the front page of DG-1052 states, please FAX to Dave Meyers at 301-415-5144. Thnx much!!

Joel

>>> <robert.b.fuld@ussev.mail.abb.com> 01/24/97 08:01pm >>>

Joel--I'm still sidelined from the Internet, but if you can carry the ball below (which I've also faxed), then I met my deadline. Thanks, and I hope this helps.

Bob F.

----- COMMENTS ON DG-1052 / RESPONSE

TO ACRS COMMENTS ON DG-1040

As a member of the ANS working group that developed ANSI/ANS-58.8-1994, I wish to comment on that Standard and on the proposed Reg Guide that would endorse it.

General

As stated in both those documents, it is plant design criteria, and not human performance criteria, that the methodology provides, supporting the analysis of design basis events in SARs. The methodology is unique in that it substantively addresses the issue known in human factors jargon as function allocation. It is, I believe, commendable in doing so with only a modest extension of the existing plant safety analysis framework. And it is hard to dispute that it is far more practical, objective, empirically-based, and safety-relevant than the competing state-of-the-art methods urged, if not imposed, by Section 4.4.3 of NUREG-0711 (Human Factors Engineering Program Review Model).

Response to ACRS Comments on DG-1040

In a letter dated November 14, 1995, the ACRS raised several objections to DG-1040, which are discussed below.

1. We find no technical basis for the estimates of minimum times for operator actions in ANSI/ANS-58.8-1994. - The technical basis is for the criteria on time response, rather than for any particular time estimates, and that basis is summarized in the Appendix to the 58.8 Standard. In contrast, time estimates are based largely on analysis of the time required for the operators tasks, guided by the rather conservative rule to allow one minute per manipulation. The technical basis for any particular time estimate remains the responsibility of the analysts, who must be able to justify their modeling of operator tasks as