UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

BEFORE ADMINISTRATIVE JUDGES
Glenn O. Bright
Dr. James H. Carpenter
James L. Kelley, Chairman

In the Matter of

2 Feb 1983

CAROLINA POWER & LIGHT COMPANY
AND NORTH CAROLINA MUNICIPAL POWER
AGENCY NO. 3

Docket Nos. 50-400 OL
50-401 OL

(Shearon Harris Nuclear Power Plant,
Units 1 and 2)

RESPONSE TO APPLICANTS MOTION
FOR DISMISSAL OF WILSON CONTENTION IVB

In its document entitled Applicants' Response to Intervenor Wilson's Response to Human Factors Design Evaluation Report For The Shearon Harris I Control Room, dated January 21, 1982, at 2, the applicants move for dismissal of my contention IVB on the grounds that I did not submit any specific contentions based on that document.

When I submitted my response to the Human Factors Design Evaluation Report I assumed that it was related to the Detailed Control Room Design Review process, but I did not realize that it was the final DCDR Report. The Applicants' response to my response now makes it clear that it is the final, formal DCDR Report.

My confusion was based on the following points:

1. The report submitted by the Applicants was not explicitly titled DCDR Report. No reference in the cover letter or the body of the document was made to NUREG 0700. The report does not follow the format recommended in NUREG 0700.

D503

2. The report submitted by the Applicants falls short of the standards set forth in NUREG 0700 in so many ways (see below) that I did not recognize it as a document intended to meet those standards.

For these reasons I did not understand, and could not have been expected to understand, that the report submitted by the Applicants on Dec. 7 was intended to be the Detailed Control Room Design Review Report described in Section 5.2 of NUREG 0700.

Now that I do understand their intent, I am submitting on a timely basis the following contention based on the document entitled Human Factors Design Evaluation Report for the Shearon Harris Unit 1 Control Room, submitted December 7, 1982, which the Applicants intend to serve as the DCDR Report

WILSON V

The DCDR Report is inadequate to fulfill the specifications and the intent of NUREG 0700.

1. The DCDR Report does not identify the human engineering discrepancies (HED's) which were revealed by the review process. (Identification is required by NUREG 0700 Section 5.2.)
2. The DCDR Report does not identify proposed or implemented solutions to identified discrepancies with potential safety consequences. The assessment process used to select design solutions is not summarized. (Requirements of NUREG 0700 Section 5.2)
3. The DCDR Report does not describe the schedules for implementation of proposed solutions to discrepancies. (Requirements of NUREG 0700, Section 5.2.)

4. The DCDR Report does not present a follow-up plan to verify that the proposed solutions do provide adequate solutions to the human engineering discrepancies that they are intended to address. (Requirement of NUREG 0700, Section 5.2.)

5. Although not specifically required by NUREG 0700, a list of the 17 Human Engineering Requirements Specifications written by the review team is provided in Section 2 of their report. There seems to be no mechanism in the NRC review process (NUREG 0801) to insure that these HER's,(as opposed to HED's) are adhered to. These HER's are a unique and important set of observations and opinions, arising out of an in-depth study of the control and monitoring systems of the Shearon Harris facilities. In the interest of developing a complete record, the HER's written by the review team should be included in their entirety in the DCDR Report.

Richard Wilson

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al.)	Dockets 50-400
Shearon Harris Nuclear Power Plant, Units 1 and 2)	and 50-401 O.L.

CERTIFICAT OF SERVICE

I hereby certify that copies of RESPONSE TO APPLICANTS MOTION FOR DISMISSAL OF WILSON CONTENTION IVB

HAVE Been served this 2nd day of February 1983, by deposit in the US Mail, first-class postage prepaid, upon all parties whose names are listed below, except those whose names are marked with an asterick, for whom service was accomplished by _____

Judges James Kelley, Glen Bright and James Carpenter (1 copy each)
Atomic Safety and Licensing Board
US Nuclear Regulatory Commission
Washington, DC 20555

George F. Trowbridge (attorney for Applicants)
Shaw, Pittman, Potts, & Trowbridge
1800 M. St. NW
Washington, DC 20036

Office of the Executive Legal Director
Attn Dockets 50-400/401 O.L.
USNRC
Washington, DC 20555

Office of the Secretary
Docketing and Service Station
Attn Dockets 50-400/401 O.L.
USNRC
Washington, DC 20555 (3 copies)

John Runkle
CCNC
307 Granville Rd.
Chapel Hill, NC 27514

Travis Payne
Edelstein & Payne
Box 12643
Raleigh, N.C. 27605

Wells Eddleman
718-A Iredell St.
Durham, NC 27705

Phyllis Lotchin, Ph.D.
108 Bridle Run
Chapel Hill, NC 27514

Dan Read
CHANGE/ELP
Box 524
Chapel Hill, NC 27514

Pat & Slater Newman
CANP
2309 Weymouth Court
Raleigh, NC 27612

Certified by Richard Wilson