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Comment for proposed revision to:
Subpart D--Revision of Sec. 55.31 To Allow Performance of Control Manipulations on the
Plant-Referenced Simulator

The proposed rulemaking to allow license candidates to substitute five reactivity manipulations on the actual plant with those on a plant simulator is not justified.

The reason for the change is the burden on plant owners particularly during restarts from long outages, caused by the existing requirement. The justification for the change is simulator fidelity. Neither the reason for the change or the justification are adequate.

What is the biggest difference between operating a real plant and a simulator? It is not the fidelity of the controls or the fidelity of the plant response. It is the stress of knowing the impact of a mistake may be much more dramatic than a call to "reset the simulator." The difference in operator stress while operating the real plant versus a simulator is not even mentioned let alone analyzed in the basis for change.

Would you put your family in an airplane whose pilot has never operated a real plane? Suppose I proved that the flight simulator was 100% faithful to the real plane, would you then? Can you imagine the FAA promoting a similar change in pilot licensing?

Training requirements are full of engineering judgments. No one could argue that we should break a reactor coolant pipe so we can evaluate the operator's response to a leak on the real plant. But to have a license program for reactor operators that allows all of their training to be "simulated" goes just as far in the other direction, regardless of the fidelity of the simulator.

Plant owners cannot shirk their responsibility for adequately training new operators. Yes, there may be an enormous cost involved and it may be inconvenient but that does not justify diluting the license requirements to the point where a licensed operator does not even have to operate the real plant. And the current cold license exceptions should not be used as justification because there are many extra controls and safeguards in place on a new startup. Not the least of which is a small fission product inventory.

Another part of the reasoning for making the change is that the current reactivity manipulations are only a small part of the overall licensing process. This should be a cause of alarm, not a reason for getting rid of the requirement. I suggest the existing requirement be strengthened so the five reactivity manipulations have to be "evaluated" manipulations. Perhaps three of the five should be required to be evaluated by senior management to show their support for "real" as opposed to simulated training. Why are the current five reactivity manipulations not evaluated? Because they are not evaluated they do become just a formality, a mundane check-off on a qualification sheet instead of an integral part of the training process. And so it now becomes a simple step to say lets just get rid of the whole troublesome "training on the real plant" issue and do it all on the simulators; as long as we have really good simulators it will be justified. To me, it clearly is not justified.

Summary:

I am against the proposed rulemaking. The existing rule is weak and should be strengthened, not deleted. To issue an operator's license based on only operating a simulator is very poor engineering judgment. The cost of making the real plant available for adequate training is a necessary operating expense.

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