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Executive Vice President  
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August 28, 2000

Mr. David L. Meyer, Chief  
Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
Mail Stop T-6 D59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Comments on Proposed Amendment to 10CFR55  
Operator License Eligibility and Use of Simulation  
Facilities in Operator Licensing  
65FR41021, dated July 3, 2000

Dear Mr. Meyer:

Duke Energy offers the attached comments relative to the solicitation for public comments regarding the proposed amendment to 10CFR55, "Operator License Eligibility and Use of Simulation Facilities in Operator Licensing," as published in the July 3, 2000 Federal Register.

Please address any questions to Jeff Thomas at (704) 382-5826.

Thank you for the opportunity to provide these comments.

Very truly yours,

  
M. S. Tuckman

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Glenn Tracey

**Proposed Amendment to 10CFR55  
Operator License Eligibility and Use of Simulation Facilities in  
Operator Licensing  
Duke Comments**

The proposed rule would add a requirement under section 55.45(b) for licensees using a plant-referenced simulator to satisfy reactivity manipulation experience requirements to ensure that "Simulator models relating to nuclear and thermal-hydraulic characteristics replicate the core load that exist in the nuclear power unit for which a license is sought at the time of the applicants operating test...".

Duke recommends that the proposed rule be revised to require that the simulator core model match the reference plant's core model at the time reactivity manipulations are performed by the license candidate(s).

It is possible for a group of license candidates to perform reactivity manipulations on a simulator model that does not replicate the plant at the time of their operating test. This can occur when a refueling outage takes place after the reactivity manipulations have been performed and before the conduct of the operating test. Based on site specific simulator procedures, simulator models may or may not be updated to reflect the characteristics of the current core load.

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