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1999**PROFESSIONAL REACTOR OPERATOR SOCIETY**

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DOCKET NUMBER  
PROPOSED RULE **PR 55**  
(65 FR 41021)Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Rulemakings and Adjudication's Staff

Reference: FR Doc. 00-16751

To Whom It May Concern:

The proposed rule change to allow initial Licensees to perform required reactivity changes on plant specific simulators is a welcome and acceptable change.

In the past, simulator training taking the place of actual plant operating experience was not used due to inherent problems and uncertainties in simulator technology and because there were few plant specific simulators. But the current advancement of simulator technology and fidelity negates the claim that "simulation" is inadequate. In fact, all other aspects of the Licensing process are performed on the simulator. This includes Reactor Startups, which is one of the most crucial manipulations expected as a Category II event, to design basis catastrophic failures, Category IV events. As stated by one PROS member, "a 5% power change is akin to getting into a car and backing it out of the garage," and is not of sufficient operational control significance to warrant the costly power change (if deviating from full power operation).

Cost Benefits as analyzed in the NRC's REGULATORY ANALYSIS notwithstanding, each facility will realize their own particular financial benefits. But undoubtedly, there will be opportunity for costs savings associated with these changes.

The rule does not specify that License candidates cannot or should not perform manipulations on the actual plant. The proposed rule will simply allow the requirement for performing five significant control manipulations that affect reactivity to be performed on the actual plant OR on the simulation facility. The candidates are still required to spend a substantial amount of time actually performing the duties of their particular positions in an On-The-Job training environment.

In conclusion, PROS finds both the reasoning and the justification for the rule changed to be sound. PROS endorses the rule change with respect to the requirements for reactivity manipulations. PROS reserves comment on the other aspects of the proposed rule change because they are not within the scope of the PROS Mission Statement.

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