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Secretary
U.S. Nuclear Regulatory Commission
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Gentlemen:

NUCLEAR REGULATORY COMMISSION - REQUEST FOR COMMENTS ON
PROPOSED CHANGES TO OPERATOR LICENSE ELIGIBILITY AND USE OF
SIMULATION FACILITIES IN OPERATOR LICENSING (Volume 65 *Federal
Register* 41021)

This letter responds to a request for comments on Proposed Changes 10CFR Part 55 to address
Operator License Eligibility and Use of Simulation Facilities in Operator Licensing (Volume 65
Federal Register 41021 issued July 3, 2000).

TVA endorses the comments provided by the Nuclear Energy Institute (NEI). In addition to
NEI's comments, TVA provides our comments in the enclosure to this letter.

If you have questions, please contact Susan Ferrell at (423) 751-7737.

Sincerely,

Mark J. Burzynski
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Manager
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Enclosure
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ENCLOSURE

COMMENTS ON PROPOSED CHANGES TO OPERATOR LICENSE ELIGIBILITY AND USE OF SIMULATION FACILITIES IN OPERATOR LICENSING, 65 *FEDERAL REGISTER* 41021 (JULY 3, 2000)

1. Section 55.45(b)(3)(i)(A) - This section would require that the models replicate the facility **at the time of the applicant's operating test**. This could unnecessarily restrict the candidate's opportunities to conduct reactivity manipulations. This would be a problem if a refueling outage occurs near the time the applicant is scheduled for the operating test or the date of the operating test changed. In most cases, a new core model is not available for use in the simulator until the related refueling outage. Typically, a utility does not make simulator model changes right before an operator examination, but the utility needs some leeway in the timing based on the training schedules, design upgrade implementation schedules, and outages. The deletion of the words "at the time of the applicant's operating test" is recommended.
2. Section 55.45(b)(3)(i)(A) - TVA proposes revising the term "nuclear power unit." We recommend that "referenced plant" be used instead. A similar wording problem exists in the proposed change to Section 55.31 (a) (5) when discussing the representative sample of control manipulations performed on the simulator. In this paragraph it states "as applicable to the design of the plant for which the license application is submitted." The current wording would not account for multi-unit facilities that apply for multi-unit operator licenses that use one simulation facility. At a given time, one of the units at a multi-unit facility could be "design ahead" of the other(s) due to the staggered outages and the implementation schedule for a design upgrade. If the operator license application is for all the units at a given facility, as is the case with TVA applications, the use of "nuclear power unit" would imply that the simulator facility would need to reflect the multiple configurations (which could be different for each of the units) at the multi-unit facility and that the reactivity manipulations would be required to be completed on each configuration separately.
3. Section 55.45(b)(3)(i)(A) - TVA proposes revising the term "replicate." While the ANSI standard allows for a reconciliation process that demonstrates that the simulator adequately represents the reference plant and uses the wording replicates, replicate could be misleading in a more legal application. The wording "reasonably represents" would more appropriately represent the process allowed under the ANSI standard.
4. The following are several examples of inconsistent wording within the Statements of Consideration that support the proposed rule change.
 - a) Plant facility, plant, and nuclear power unit are used interchangeably when discussing the requirement for control manipulations. For a multi-unit facility, the three phrases can have distinctly different meanings and ramifications on the actual number of manipulations that would be required. The use of "nuclear power unit" for a multi-unit

the units if the design configuration is anticipated to be slightly different on each unit at the time of an operator license application due to the staggered outages and design upgrade implementation schedules. The use of "plant" could be interpreted as one of the units of a multi-unit facility or as the same as a "facility." A more appropriate term would be "reference unit."

- b) In discussing the requirements of the simulator that will be used for control manipulations, the terms replicate, represent, and reasonably represent are used interchangeably. The proposed wording in Section 55.45 (b) (3) (i) (A) uses the word "replicate." A more appropriate wording throughout would be "reasonably represents."
- c) In discussing the testing that would be required by the NRC to take credit for manipulation performed as a plant-reference simulator in the Statements of Consideration, the scope of the testing is described as: 1) to encompass verification, validation, and documentation, and 2) developmental and verification testing. On the other hand, the proposed wording in the rule change Section 55.45 (b) (3) (i) (B) describes the specific performance testing requirements as, "Simulator fidelity has been demonstrated so that significant control manipulation are completed without procedural exceptions, simulator performance exceptions, or deviation from approved training scenario sequence." It is important to note that certain words with specific definitions in ANSI/ANS 3.5-1998 (i.e., verification and validation) are not used in the rule itself. We recommend that the Statements of Consideration use the same language as the rule itself.