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PROPOSED RULE **PR 55**
(65 FR 41021)

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PECO NUCLEAR

A Unit of PECO Energy

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September 19, 2000

Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Subject: Comments Concerning Operator License Eligibility and Use of Simulation Facilities in Operator Licensing (65FR41021-41029, dated July 3, 2000)

Dear Sir/Madam:

This letter is being submitted in response to the Nuclear Regulatory Commission's (NRC) request for comments concerning operator license eligibility and use of simulation facilities in operator licensing. The proposed rule was published in the Federal Register on July 3, 2000 (65FR41021-41029). The NRC is proposing to amend its regulations by allowing applicants for operator and senior operator licenses to fulfill a portion of the experience and prerequisites for license eligibility by manipulating a plant-referenced simulator as an alternative to use of the actual plant. In addition, the proposed rule would remove current requirements for certification of simulation facilities and routine submittal of simulator performance test reports to the NRC for review. The proposed rule would also revise the definitions of "Performance Testing," "Plant-referenced simulator," and "Simulator Facility."

PECO Energy appreciates the opportunity to comment on the proposed rule. PECO Energy supports the proposed rule. If approved, plant management would be afforded additional flexibility in the methods used to establish the competence of licensed operator candidates, in the area of reactivity manipulations.

If you have any questions, please do not hesitate to contact us.

Sincerely,

James A. Hutton, Jr.
Director - Licensing

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