

DOCKET NUMBER  
PROPOSED RULEPR 55  
(65 FR 41021)RECEIVED  
US NRC

14

From: <CharmedMeson@aol.com>  
 To: <gmt@nrc.gov>  
 Date: Mon, Sep 18, 2000 5:56 AM  
 Subject: Comment: Proposed Rule - Reactivity Manipulations

'00 OCT 17 A 8:38

Glenn,

Herein is a comment for the proposed rule on reactivity manipulations. This is my comment, not affiliated with any other organization or company.

OFFICE OF  
ADJUTANT GENERAL

Bob Meyer  
 Training Instructor for Licensed Operators

## Comment:

The fidelity of the simulator is not proportional to the induced stressed from real plant operations. As a minimum, one 10% power change should be mandatory prior to an Unconditional License. If plant conditions warrant, a conditional License is issued. The condition is that an observed manipulation is performed. For those plant not in compliance with 100% of the fidelity issues as delineated by the guideline, the candidates must perform three 10% changes, which would include startups and responses to reactor trips. Strictly requiring compliance with fidelity issues will ensure the identified fidelity issues are addressed.

In the past the NRC has wavered from the 10CFR requirements and allowed utilities to deviate from the intent. This allowed the utilities to use a wide range of interpretations for the required reactivity manipulations. The deviations became the norm rather than the rule. Wholesale deviations from this rule cannot be made. The proposed rule must have at least one or more additional manipulations on the plant if the letter of the fidelity guideline is not met. We, as an industry who have been through the TMI era would be remiss not mandating at least one or two real manipulations for a license candidate. If plant conditions warrant issue a conditional license.

There are licensed operators and senior licensed operators who have never seen or responded to an actual reactor trip. That is not the first time they should experience real plant operations. The stress induced error rate would be unacceptable. The control rooms operating as a team, incorporates error recovery rates that may bring the total Control Room Management Team (including inexperienced operators) error rate within the acceptable range.

In conclusion, the industry needs clear guidelines, minimum deviations and appropriate penalties for any noncompliance. Safety dictates that initial license candidates be given the opportunity to move the plant without regard to real or perceived costs. It has always been hard putting a dollar value on training, until we look at our past mistakes. The opportunity for actual reactivity manipulations reduces the stress induced error rate, notably during transient conditions when clear decision making counts.

Template = SECY-067

SECY-02