From: Robert Royce <Robert.S.Royce@dom.com>
To: <nrcrep@nrc.gov>
Date: Wed, May 23, 2007 9:28 AM
Subject: Response from "Comment on NRC Documents"

5/21/07
72 FR 28728
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Below is the result of your feedback form. It was submitted by

Robert Royce (Robert.S.Royce@dom.com) on Wednesday, May 23, 2007 at 09:27:48

Document_Title: NUREG-1021, Rev 9
Operator Licensing Examination Standards For Power Reactors

Comments: ES-301, Section D.5.c. says "scenarios... should include startup, low-power, and full-power situations." A note at the bottom of the page states "NUREG-1449, 'NRC Staff Evaluation of Shutdown and Low-Power Operation,' defines 'low power' to include the range from criticality to 5 percent power."

It was difficult to develop a "low power" scenario that did not run excessively long, as the crew needs a fairly lengthy time for pre-briefing the scenario, and the crew takes longer to maneuver the plant at such low powers. Also, the crew in the plant would have an extra operator at the feed station during portions of the startup, and the risk of a feed-station related reactor trip is also significant, potentially invalidating portions of the scenario.

We are already required to test applicants at low power/shutdown conditions during the JPM exam per ES-301, section D.4.b. Is it possible to remove the definition of "low power" from section D.5.c, allowing the Sim Operating Test scenario to be at 25%, 50%, etc.?

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