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Serial: PE&RAS-07-038  
July 23, 2007

Chief, Rules, Directives, and Editing Branch  
United States Nuclear Regulatory Commission  
Mail Stop T6-D59  
Washington, DC 20555-0001

**SUBJECT:** Comments on Draft Supplements to NUREGs-1021, Revision 9, NUREG-1122, Revision 2, and NUREG-1123, Revision 2 (72 FR 28728, May 22, 2007)

Ladies and Gentlemen:

Progress Energy is pleased to submit comments on the subject draft NUREG supplements. Comments, grouped by subject NUREG, are provided below.

**NUREG-1021, Revision 9, Supplement 1**

1. ES-201, Page 18 of 28 – 2<sup>nd</sup> bullet next to last sentence; this statement could result in exam compromise if feedback is too specific. Notifying a candidate that they are looking at the wrong procedure revision could suggest that the individual making the notification has knowledge of exam items relating to the procedure in question. It would be best to establish a time when procedures are frozen and notify candidates of this point in time.

2. ES-204, Page 4 of 7 – Item e states:

*If the facility licensee certifies that the applicant has successfully completed a training program accredited by the Institute of Nuclear Power Operations using an acceptable simulation facility, the region may waive the requirement for 10 startups on a research reactor, which is typically required by NRC-approved cold license training programs.*

Page 2 of 4 of the Record of Proposed Changes states:

*For new plants, cold license training programs will likely not do start-ups on research reactors. Deleted this wording.*

The wording is deleted from ES-202 (Page 12 of 13) but remains in ES-204. Recommend deleting wording from ES-204 as well.

3. ES-301, Page 3 of 27 – “The fourth topic, Emergency Plan, ...” should read “The fourth topic, Emergency Procedures/Plan, ...” to reflect the title of Section 2.4 of NUREGs - 1122 and -1123. The same comment applies to Page 10 of 27, “Administrative Topics” Table and Page 12 of 27 (“Emergency Plan”).
4. ES-402, Page 6 of 6, Item 4 – adds a new requirement which states:

*When submitting applicant comments to the NRC, the facility licensee should identify by docket number which applicant made the comment, and include a facility position for each applicant comment.*

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Requiring the applicant's docket number may limit feedback from the applicants. Recommend deleting the new requirement to include the applicant's docket number.

5. ES-403, Page 3 of 6, Item b and ES-501, Page 4 of 25, Item b – Post examination changes should be allowed if additional or unknown information is identified that proves an exam answer incorrect or correct. It should not matter if the NRC and facility previously agreed that the exam met the requirements of NUREG-1021.

**NUREG-1122, Revision 2, Supplement 1**

1. Page 1-6, Section 1.8, 2<sup>nd</sup> paragraph – This paragraph states:

*The generic K/As for "Conduct of Operations," are used to evaluate the applicant's knowledge of the daily operation of the facility. The types of information covered under this category may include for example, shift turnover or temporary modification procedures.*

“Temporary modification procedures” should not be listed as an example for the “Conduct of Operations” K/As since temporary modification of procedures are now addressed by the “Equipment Control” K/As. Reference changes made to NUREG-1021, Supplement 1, ES-301, Page 2 of 27.

**NUREG-1123, Revision 2, Supplement 1**

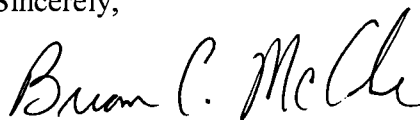
1. Page 1-5, Section 1.8, 2<sup>nd</sup> paragraph – This paragraph states:

*The generic K/As for "Conduct of Operations," are used to evaluate the applicant's knowledge of the daily operation of the facility. The types of information covered under this category may include for example, shift turnover or temporary modification procedures.*

“Temporary modification procedures” should not be listed as an example for the “Conduct of Operations” K/As since temporary modifications of procedures are now addressed by the “Equipment Control” K/As. Reference changes made to NUREG-1021, Supplement 1, ES-301, Page 2 of 27.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,



Brian McCabe  
Supervisor - Regulatory Affairs

DBM