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LETTER

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Chief, Rules, Directives, and Editing Branch  
Division of Administrative Services, Office of Administration  
U. S. Nuclear Regulatory Commission  
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Washington D. C. 20555-0001

5/22/07  
72 FR 28728  
8

Subject: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC (Duke)  
Comments on Draft Supplements to Revision 9 of NUREG-1021 and to  
Revision 2 of NUREG-1122

The purpose of this letter is to provide Duke comments on draft supplements to  
Revision 9 of NUREG-1021, "Operator Licensing Examination Standards for Power  
Reactors," and to Revision 2 of NUREG-122 "Knowledge and Abilities Catalog for  
Nuclear Power Plant Operators: Pressured Water Reactors" as published in the *Federal  
Register* (72 FR 28728) on May 22, 2007.

Duke appreciates the opportunity to provide comments and submits an Attachment for  
consideration by the NRC staff.

Sincerely,

Thomas P. Harrall, Jr.

Attachment

SONS I Renew Complete  
Template = ADM-013

FRIDS = ADM-03  
Call = D. Muller  
(dsm3)

**Duke Comments on Draft Supplements  
to Revision 9 of NUREG-1021 and to Revision 2 of NUREG-1122  
72 FR 28728 Dated May 22, 2007**

**Comments on NUREG 1021 Revision 9, Supplement 1**

**ES-201, Attachment 2, page 18 of 28:**

The fourth bullet states that if changes to procedures “are significant, the NRC would likely request more information about the nature of such training and testing.

**Duke Comment:** Training and testing on major procedure changes for licensed operators is routinely performed without NRC review. The inclusion of a requirement to provide training and if necessary evaluation on plant related changes to candidates should be sufficient.

**ES-301 B.1, page 3 of 27:**

Security event procedures were added as an Emergency Plan Topic for JPMs.

**Duke Comment:** Security event procedures are safeguards information. The inclusion of this topic in the exam adds the potential for the loss of control of the information. This topic should not be included as a testable topic.

**ES-401 Attachment 2 (Deleted), page 16 of 34**

**Duke Comments:**

The statement in paragraph 1, “The remaining Section 2 K/As may be excluded from the random selection process and/or rejected without explanation or justification.” was not incorporated into the body of ES-401. This deletion was not described in the list of changes. Was this an oversight or was this statement deleted intentionally? Why?

The Note following paragraph 2 was not incorporated into the body of ES-401. Was this an oversight or was this note deleted intentionally? Why?

**ES-603 C.1.d, page 3 of 7 and Appendix C, B.3, page 2 of 10**

The last sentence in the new (second) paragraph states: “However, JPMs should not solely test immediate actions steps, and should include testing additional steps or items that are not from memory.”

**Duke Comment:** Performance of immediate actions requires operators and senior operators to demonstrate an understanding of and ability to perform necessary actions which satisfies 10 CFR 55.59(a)(2)(ii). The inclusion of additional actions should be determined by the total number of observable actions, not solely because immediate actions are performed from memory. Some immediate action events can provide sufficient observable actions to properly evaluate an operator. The statement should be revised to require additional steps when an immediate action event does not include sufficient observable actions to properly evaluate the operator.

## **Comments on NUREG 1122 Revision 2, Supplement 1**

### **2.4 Emergency Procedure/Plan, page 2-15**

**Duke Comment:** Delete K/A 2.4.28, "Knowledge of procedures relating to a security event." Security procedures are safeguards information. Including the evaluation of those procedures in the exam creates the potential for loss of control of the information due to the need to provide the copies of the procedures for training, study, and reference. Access to those procedures is normally strictly controlled and limited. Training and evaluation of security procedures should be left up to the station as part of the qualification program for newly licensed operators.