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From: TIM CASSIDY

MANAG SIMULATION SUBCOMMITTEE CHAIRMAN
Operations Training Center

Seabrook Station (Mail Code: OTC)

P.O. Box 300

Seabrook, NH 03874

Fax #: 301-492-3446

Fax #: (603) 773-7630

Phone #: _____

Phone #: 603-773-7651

E:mail Address: _____

E:mail Address: TIMOTHY_CASSIDY@FPL.COM

Comments: PUBLIC COMMENT SUBMITTAL WITH

RESPECT TO DG-1248 FROM

THE MID-ATLANTIC NUCLEAR TRAINING GROUP (MANTG)

SIMULATION SUB-COMMITTEE.

PLEASE CONFIRM RECEIPT TO CONTACT

INFORMATION PROVIDED ABOVE.

SUNSI Review Complete

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M. Q. (MSE)

June 28, 2010

The following document constitutes a summary of comments and questions from the Mid-Atlantic Nuclear Training Group Simulator Subcommittee with respect to NRC DG-1248 (dated May, 2010). MANTG member plants include the following:

- Seabrook Station (NextEra Energy)
- Pilgrim (Entergy)
- Millstone (Dominion)
- Vermont Yankee (Entergy)
- R.E. Ginna (Constellation)
- Nine Mile Point (Constellation)
- Fitzpatrick (Entergy)
- Indian Point (Entergy)
- Oyster Creek (Exelon)
- Limerick (Exelon)
- Peach Bottom (Exelon)
- Salem and Hope Creek (PSEG)
- Calvert Cliffs (Constellation)
- Susquehanna (PP&L)
- Beaver Valley (FENOC)
- Davis-Besse (FENOC)
- Perry (FENOC)

1. Section C.1 and Section D

This section in conjunction with similar information in Section D implies that industry commitment to ANSI/ANS 3.5-2009 is strictly voluntary and that "the NRC does not intend or approve any imposition or backfit in connection with this issuance". However, the last paragraph of Section D states that "the NRC staff anticipates simulation facility licensees that maintain and use a plant-referenced simulator to meet 10 CFR Part 55 requirements will voluntarily transition to ANSI/ANS 3.5-2009". This information implies that there would be no regulatory consequences for a facility licensee that does not voluntarily commit to ANSI/ANS 3.5-2009. In terms of the simulator portion of the IP71111.11 operator requalification program inspection process, how will the NRC deal with a facility licensee that does not voluntarily commit to ANSI/ANS 3.5 -2009?

2. Section C.2.b

- This section appears to require that facility licensees retain the results of simulator malfunction testing for the entire life of the simulation facility. This is more restrictive than the Federal Regulation in 10 CFR 55 Part 46

which requires that "the results of performance tests must be retained for four years after the completion of each performance test or until superseded by updated test results". How can a Regulatory Guide impose more requirements / restrictions on a facility licensee than the regulation on which it is based?

- 10 CFR 55 part 46 became effective in November 2001. Based upon the four year record retention requirement of this new 'simulator rule' some facility licensees that committed to ANSI/ANS 3.5 - 1998 in 2002 (or earlier) may have discarded individual malfunction test documentation that was completed under a previous commitment to ANSI/ANS 3.5 -1985 or 1993. Prior to November, 2001 facility licensee simulation facilities were certified to the NRC on a 4-year cyclic basis. Every four years a report documenting the results of simulator performance tests (including individual malfunction testing) was submitted to the NRC along with NRC Form 474. Since this section of the Draft Guide requires that facility licensees make available to the NRC the "associated test documentation that includes the completed test results" does the facilities' previous certification submittals to the NRC under older versions of ANSI/ANS 3.5 suffice for this 'proof' of individual malfunction testing?
- Since approximately 50% of facility licensees are currently committed to ANSI/ANS 3.5 - 1998 which requires Scenario-based testing in lieu of discreet malfunction testing (i.e., malfunctions are tested within scenarios vice via an individual test) does existing SBT documentation suffice for proof of malfunction testing under this section of the Draft Guide?
- The majority opinion of the MANTG membership is that this section of the Draft Guide is extraneous and potentially burdensome.

Section C.2.g

Many facility licensees have standardized on a core cycle length such that core parameters that would be noticeable by a licensed operator do not change appreciably from cycle to cycle. Consequently, some facility licensees conduct a detailed comparison of the characteristics of the two cores (in conjunction with the Reactor Engineering Dept.) and if they meet the established facility acceptance criteria do not conduct detailed core performance testing for the new cycle core (i.e., the detailed core performance testing conducted for the previous cycle is considered applicable to the new cycle). Does this practice suffice for the requirements of this section of the Draft Guide?

Section C.2.h

- The term 'significant' in item (3) with respect to unplanned/unexpected reactivity changes is vague. This item should be eliminated as the facility should decide what is 'significant' as specified in item (5).
- In terms of item (2), it is assumed that planned manual reactor trips at the end of an operating cycle during a plant shutdown into a refueling outage would NOT require Post-event Scenario Testing. Please clarify.
- In terms of item (1), it is assumed that only unplanned ESF actuations are included in this requirement and NOT those that may be initiated for plant surveillance testing. Please clarify.
- MANTG recommends clarifying the 60 day requirement for completion of this test to specifically address the initial benchmark of the simulator against the plant transient/event based upon preliminary data available from the plant. Most plant trips or other significant events require a root cause evaluation which can sometimes take up to 60 days to complete before the final results are made available to the station staff. Several MANTG members also suggested a 90 day vice 60 day time limit for this testing as being more reasonable.

Section C4

The NRC staff has publicly communicated to the industry a 6 month transition period between the effective date of Revision 4 of Reg Guide 1.149 and when facility licensees are expected to have revised their simulator testing programs accordingly. No such transition period is discussed in this document and MANTG suggests inclusion here or in some additional regulatory correspondence.

Section D

What are the NRC's expectations with respect to facility licensee communication on their commitment to ANSI/ANS -3.5 - 2009 (i.e., formal docketed correspondence, phonecon, etc.)?