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Rules, Announcements, and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555-0001

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75 FR 29785

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Dear Sir or Madam:

**Subject:** ANS-3.5 Working Group Comments - Draft Regulatory Guide DG-1248 "Nuclear Power Plant Simulation Facilities for Use in Operator Training, License Examinations, and Applicant Experience Requirements"

The ANS-3.5 Working Group convened a meeting at the Oconee Nuclear Station 27-29 July 2010 during which an agenda item was to review and comment on the Draft Regulatory Guide DG-1248 "Nuclear Power Plant Simulation Facilities for Use in Operator Training, License Examinations, and Applicant Experience Requirements". This draft regulatory guide fully endorses ANSI/ANS-3.5-2009 with some clarifications.

Please find included in this correspondence eight (8) comments on DG-1248 to which agreement was reached by a majority of the Working Group members attending the meeting. These comments are not the result of the consensus process within the American Nuclear Society Standards Committee and thereby represent only the opinion of the ANS-3.5 Working Group.

The ANS-3.5 Working Group (WG) appreciates the opportunity to review and comment on this document and looks forward to a favorable revision of DG-1248 to incorporate these ANS-3.5 WG comments.

Sincerely,

*Timothy Dennis*

Timothy Dennis  
chair - ANS-3.5 Working Group  
645 Lehigh Gap St.  
Post Office Box 119  
Walnutport, Pennsylvania 18088-0119  
(610) 767-0979

copy: via e-mail - ANS-3.5 Working Group Membership  
ANS-3.5 Working Group 27-29 July 2010 Meeting Guests  
C E Carpenter - ANS-21 vice-chair (NRC)  
C A Mazzola - NFSC chair (Shaw Group E&I)  
R M Ruby - NFSC vice-chair (Constellation-Ginna)  
N P Kadambi - Standards Board chair (individual)  
D J Spellman - Standards Board vice-chair (ORNL)  
P Schroeder - Standards Administrator (ANS)

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add = R. Carpenter (rge1)  
m. Case (HSC)

## ANS-3.5 Working Group Comments

### DRAFT REGULATORY GUIDE DG-1248

Item	Reference	Comment
1	<p>Section B. Discussion</p> <p>Role of Nuclear Power Plant Simulation Facilities in Operator Licensing</p> <p>Third Paragraph (Page 3)</p>	<p>This paragraph states "This guide also applies to the use of new full-scope nuclear power plant simulation facilities...". The ANS 3.5 Standard, section 5.1 defines possible sources of Simulator Design Baseline design data. No source exists for the category of "no design data available", particularly in the case of Distributed Control Systems, yet the draft regulatory guide states the standard applies to new build plants. If a simulator must be delivered to support initial licensed operator training prior to detail design data becoming available, please explain the staff's rationale for concluding that the current edition of the standard can be applied to simulators for new build plants.</p>
2	<p>Section C. Regulatory Position</p> <p>Item 2.b.</p> <p>Malfunctions (Page 5)</p>	<p>In 10 CFR 55.46(3)(d)(1) does the requirement for record retention of four years after the completion of each performance test or until superseded by updated test results mean whichever is longer (i.e. - if test results are not superseded within four years, can the performance test record be discarded after four years)? NEI-09-09 malfunction record retention (life of the simulator) appears to be more restrictive than 10 CFR 55.46(3)(d)(1) (four years or until superseded by updated test results). Please clarify malfunction tests record retention.</p>
3	<p>Section C. Regulatory Position</p> <p>Item 2.e.</p> <p>4.4.3.1 Simulator Operability Testing (Page 6)</p>	<p>Delete DG-1248 section C.2.e.</p> <p>Section C.2.e in DG-1248 (in regard to Section 4.4.3.1, "Simulator Operability Testing," Footnote 6, as referenced to Appendix A, "Guideline for Documentation of Simulator Design and Test Performance," simulation facility licensees should note that Appendix A provides examples that are applicable to Section 4.4.3.1) is already contained within ANSI/ANS-3.5-2009. Section 4.4.3.1 Note 6 (Appendix A) provides examples of acceptable simulator performance test documentation. This is stating a fact which is already confirmed in the Standard.</p>

## ANS-3.5 Working Group Comments

### DRAFT REGULATORY GUIDE DG-1248

Item	Reference	Comment
4	Section C. Regulatory Position  Item 2.h.  4.4.3.4 Post- Event Simulator Testing  (Page 6)	Suggest items (1), (2) and (4) in C.2.h address unplanned events only.  Paragraph C.2.h of Draft Guide 1248 appears to be too broad.
5	Section C. Regulatory Position  Item 2.h.  4.4.3.4 Post- Event Simulator Testing  (Page 6)	Request the phrase "within 60 calendar days following the event" in DG-1248 paragraph C.2.h be removed. ANSI/ANS-3.5-2009 Section 4.4.3.4 provides adequate guidance.
6	Section C. Regulatory Position  Item 3  NRC Acceptance and Endorsement of NEI-09-09, Revision 1  (Page 7)	Delete contents in parenthesis in the last part of the second sentence; "(and ANSI/ANS-3.5-1998, which NEI-09-09, Revision 0, supported)".  Under this section (NRC Acceptance and Endorsement of NEI-09-09, revision 1) we should only be dealing with items and issues which deal with the ANS-3.5-2009 Standard.
7	Glossary  (Page 11)	Please reconsider the use of "reference unit" in lieu of "reference plant" for consistency with regard to the ANSI/ANS-3.5 Standard.
8	Appendix B  (Page B-1)	Remove Appendix B from DG-1248.  Checklist is repetitive to the NRC NEI-09-09 endorsement.