

# PUBLIC SUBMISSION

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**Comment On:** NRC-2010-0187-0001  
Draft Regulatory Guide: Issuance, Availability

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## General Comment

Comment on Draft Regulatory Guide DG-1248

See attached Word .doc file:

## Attachments

**NRC-2010-0187-DRAFT-0005.1:** Comment on FR Doc # 2010-12762

*SOUSI Review Complete*  
*Template = ADM-013*

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*Call = R. Carpenter (RCA)*  
*M. Cox (MSC)*

27 august 2010

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

RE: Draft Regulatory Guide DG-1248 "NUCLEAR POWER PLANT SIMULATION FACILITIES FOR USE IN OPERATOR TRAINING, LICENSE EXAMINATIONS, AND APPLICANT EXPERIENCE REQUIREMENTS"

Comment 1 of 2:

Section 4.4.3.4 of ANSI/ANS-3.5-2009 (the Standard) complements section 3.4.3.4 of the Standard in the relationship fostered by section 1.2 "Background", that is, "The organization of the standard is such that simulator functional and physical requirements described in Sec. 3 correspond to testing and validation requirements described in Sec. 4. The subnumbering of Secs. 3 and 4 is consistent so that corresponding section paragraphs address the same subject matter from a requirements and testing standpoint".

The commencement basis of the Standard's recommendation to conduct post-event simulator testing (PEST) in section 3.4.3.4 is when relevant reference unit performance data is identified, thus providing an opportunity to validate that the simulator performs appropriately for those events which are in the scope of simulation.

Draft Regulatory Guide DG-1248 section C.2.h delineates events that might or might not provide data relevant to the simulator. It also suggests that PEST is preferred for major or "significant" events of the plant whereat minor events could provide much more relevant data. A reactor or turbine-generator trip, engineered safety system actuation, or planned/unplanned reactivity change might provide relevant data, if the event has not been previously validated on the simulator in its current configuration, but, if the event is a re-occurrence of a previous event with a similar fuel cycle, there might be no relevant data to be acquired and compared.

Therefore, it is suggested that the new Regulatory Guide 1.149 rev 4 might contain a provision in place of section C.2.h such as the following:

"The licensee should have a process in place to identify reference unit events that have the potential to improve the response of the plant-referenced simulator. Events in the scope of simulation that are evaluated to be similar to those previously tested by post-event simulator testing or other methods of simulator testing need not be re-tested. The process should include evaluation of plant events within a reasonable time considering training needs, data availability, and other plant administrative processes that could provide conclusive results."

The C.2.h direct enumeration of plant events is then included within the process when the event is unfamiliar, untested on the simulator, and within the scope of simulation,

but without creating a fixed re-testing regime similar to that encountered in the previous mandated individual malfunction testing as regulations-required performance testing.

Those that adopt the Regulatory Guide with this provision would then be subject to having a process in place for PEST as opposed to the recommendation in the Standard wherein there is no requirement for an alternative and, thereby, can be ignored.

Comment 2 of 2:

It might be useful to include a statement in section B. Background that the US Nuclear Regulatory Commission was authorized and directed by Congress "to promulgate regulations, or other appropriate Commission regulatory guidance, for the training and qualifications of civilian nuclear powerplant operators, supervisors, technicians and other appropriate operating personnel." [Nuclear Waste Policy Act of 1982 sec 306], whereby Regulatory Guide 1.149 was first issued.

NUCLEAR REGULATORY COMMISSION TRAINING AUTHORIZATION  
SEC. 306. NUCLEAR REGULATORY COMMISSION TRAINING AUTHORIZATION.—  
The Nuclear Regulatory Commission is authorized and directed to promulgate regulations, or other appropriate Commission regulatory guidance, for the training and qualifications of civilian nuclear powerplant operators, supervisors, technicians and other appropriate operating personnel. Such regulations or guidance shall establish simulator training requirements for applicants for civilian nuclear powerplant operator licenses and for operator requalification programs; requirements governing NRC administration of requalification examinations; requirements for operating tests at civilian nuclear powerplant simulators, and instructional requirements for civilian nuclear powerplant licensee personnel training programs. Such regulations or other regulatory guidance shall be promulgated by the Commission within the 12-month period following enactment of this Act, and the Commission within the 12-month period following enactment of this Act shall submit a report to Congress setting forth the actions the Commission has taken with respect to fulfilling its obligations under this section.  
[42 U.S.C. 10226]

Respectfully submitted

Timothy Dennis

-as an individual public comment not a part of any organization  
submitted via <[www.regulations.gov](http://www.regulations.gov)>