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Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

ATTN: Rules, Announcements, and Directives Branch

**SUBJECT:** Draft Regulatory Guide DG-1248 (*Proposed Revision 4 of Regulatory Guide 1.149, dated October 2001*) Nuclear Power Plant Simulation Facilities for Use in Operator Training, License Examinations, and Applicant Experience Requirements

Ladies and Gentlemen,

Progress Energy appreciates the opportunity to provide the enclosed comments on the subject document.

Please contact Roy Linton, Jr. at 352-795-0504 if you have any questions.

Sincerely,

Brian McCabe  
Manager – Nuclear Regulatory Affairs

KMH  
Enclosure

RULES AND DIRECTIVES  
BRANCH  
USNRC

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SUNSI Review Complete  
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Add = R. Carpenter (9301)  
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Enclosure

| # | Reference   | Original Text   | Comment  | Proposed Revision  |
|---|---|---|--|--|
| 1 | Page 5, Section 2.b under "NRC Acceptance and Endorsement of ANSI/ANS-3.5-2009" | <p>b. In regard to Section 3.1.4, "Malfunctions," simulation facility licensees should demonstrate that they have conducted performance testing of the malfunctions listed in the standard, as applicable to the design of the reference plant, at least once in the life of the simulation facility and that the associated test documentation includes the completed test results. If performance testing of a malfunction has been completed more than once, then the licensee need only retain the latest test results. The staff recognizes that simulator malfunction test results may be retained longer than 4 years after the completion of each malfunction test. Therefore, regardless of how long it has been since the malfunction test has been performed, the NRC expects simulation facility licensees to make the results of these malfunction performance tests available for NRC review, either before, or concurrent with, the preparation for each operating test or requalification program inspection.</p> | <p>This paragraph should be deleted from this section. This paragraph is not consistent with the records retention requirement in 10 CFR 55.46(d)(1) which states 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results of performance tests must be retained for four years after the completion of each performance test or until superseded by updated test results."</p> <p>The CFR reference allows malfunction tests to be discarded after four years. There is no requirement to maintain performance tests records longer than four years.</p> <p>Additionally, the NRC has previously inspected the results of the ANS-3.5-1985 Standard malfunction testing and approved initial certification of simulators which included the malfunction tests.</p> | <p><del>b. In regard to Section 3.1.4, "Malfunctions," simulation facility licensees should demonstrate that they have conducted performance testing of the malfunctions listed in the standard, as applicable to the design of the reference plant, at least once in the life of the simulation facility and that the associated test documentation includes the completed test results. If performance testing of a malfunction has been completed more than once, then the licensee need only retain the latest test results. The staff recognizes that simulator malfunction test results may be retained longer than 4 years after the completion of each malfunction test. Therefore, regardless of how long it has been since the malfunction test has been performed, the NRC expects simulation facility licensees to make the results of these malfunction performance tests available for NRC review, either before, or concurrent with, the preparation for each operating test or requalification program inspection.</del></p> |

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| 2 | Page 6, Section 2.g under "NRC Acceptance and Endorsement of ANSI/ANS-3.5-2009" | g. In regard to Section 4.4.3.3, "Simulator Reactor Core Performance Testing," simulation facility licensees should meet the requirements of the standard with respect to real time and the conduct of core evolutions involved. | <p>First sentence:</p> <ol style="list-style-type: none"> <li>1. Add "within the scope of simulation" to be consistent with Section 3.4.3.3 of Standard.</li> <li>2. Delete "with respect to real time"; there are some simulator performance tests that would require an eight hour run time (such as a peak xenon test). Simulation facilities appreciate the use of the fast time simulation feature to conduct tests that would require an extensive amount of run time in an age where simulator utilization by the operations training programs is very high.</li> <li>3. Clarify "... and the conduct of core evolutions involved". This appears to be an incomplete sentence.</li> </ol> | g. In regard to Section 4.4.3.3, "Simulator Reactor Core Performance Testing," simulation facility licensees should meet the requirements of the standard within the scope of simulation <del>with respect to real time...</del> |

| # | Reference   | Original Text  | Comment  | Proposed Revision   |
|---|---|--|--|---|
| 3 | Page 6, Section 2.h under "NRC Acceptance and Endorsement of ANSI/ANS-3.5-2009" | (4) the manual or automatic trip of the main turbine-generator while online with the electrical grid, and (5) any other event deemed appropriate by the facility licensee within 60 calendar days following the event to ensure that fidelity is being met and maintained. | <p>Delete item 5 from the list and add the following clarification: "The comparison should be performed and any significant deviations identified within 90 days of the event."</p> <p>This is to clarify that resolutions to noted deviations are not required to be resolved within a specified number of days. Depending on scope of deviation, efforts to resolve could take longer than 60 days (and may require vendor support or model replacements).</p> <p>Notwithstanding, 60 days may be difficult to achieve given that the plant event must first be diagnosed and fully understood by the plant staff "event review team" and a final report issued.</p> | (4) the manual or automatic trip of the main turbine-generator while online with the electrical grid, <del>and (5) any other event deemed appropriate by the facility licensee within 60 calendar days following the event to ensure that fidelity is being met and maintained.</del> The comparison should be performed and any significant deviations identified within 90 days of the event. |