# Southern California Edison Company

23 PARKER STREET IRVINE, CALIFORNIA 92718

F. R. NANDY MANAGER OF NUCLEAR LICENSING

July 03, 1990

TELEPHONE (714) 587-5400

U. S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, D.C. 20555

Gentlemen:

Subject: Docket No. 50-206 Simulator Exemption Request San Onofre Nuclear Generating Station Unit 1

Your letter of June 8, 1990, informed us that additional information is necessary to complete NRC review of our request for a schedule exemption concerning the simulator rule (10 CFR 55.45(b)). Enclosed with this letter is the specific information you requested. It consists of each question as stated in your enclosure followed by our response to the question.

Your letter also requested a clarification regarding the status of our submittal of May 26, 1988, on the simulator rule. That submittal contained a plan to qualify and obtain NRC approval for continued use of the Zion simulator for operator examinations and testing. Since our decision to procure a new plant reference simulator supersedes that plan, the May 26, 1988, submittal should be disregarded.

If you have any further questions, please call me.

Very truly yours,

Enclosure

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cc: J. B. Martin, Regional Administrator, NRC Region V C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

## NRC'S REQUEST FOR ADDITIONAL INFORMATION REGARDING SAN ONOFRE UNIT 1 PLANT REFERENCE SIMULATOR EXEMPTION REQUEST

## 1. <u>Question</u>

The Commonwealth Edison Company is currently procuring a new simulator to replace the existing Zion simulator. Please describe the effect this will have on your continued use of the Zion simulator.

### Response

SCE is aware that Commonwealth Edison is procuring a new simulator for the Zion plant. Both the new and the existing simulators will be kept on-site at Zion. Westinghouse will retain ownership of the existing simulator while Commonwealth Edison will own the new simulator. We have an informal agreement with Westinghouse to use the existing Zion simulator for operator exams and training until our own new simulator is in place and operational. We will be formalizing our agreement with Westinghouse in the near future.

### 2. <u>Question</u>

The specific duration of the exemption from the certification filing deadline of 10 CFR 55.45(b)(2)(iii) which you are requesting is not clear. Please provide the specific date by which you plan to submit your simulation facility certification.

## Response

Our exemption request indicated that certification would be submitted at least 60 days prior to the first exams on the new simulator. The exact date of these first exams is not known at this time. However, the certification process will be completed prior to use of the simulator for training which starts in February 1993. Therefore, submittal of certification on Form NRC-474, "Simulation Facility Certification," is planned for no later than February 28, 1993, which is coincident with the release of the simulator for operator training.

### 3. <u>Question</u>

To what extent could the following options expedite simulator certification? What would be the additional cost associated with each?

- a. Preparation of the certification submittal in parallel with the simulator construction;
- Extensive use of operations personnel in the simulator construction and testing so that they will become familiar with the new facility more quickly;

- c. Reduction of the 30-month construction time which is longer than the current average construction time of 29 months;
- d. Submission of your certification prior to incorporation of the CRDR modifications, or if the scope of these modifications is known, incorporating them during the initial simulator construction. (Note that ANSI/ANS-3.5-1985 allows up to 30 months after the simulator operational date to incorporate modifications.)

### <u>Response</u>

- a. Our program includes preparation of certification documentation in parallel with simulator construction and testing. The costs for processing certification in parallel are already included in the project.
- b. A small number of operations personnel will be involved in acceptance testing of the simulator. This will give them initial familiarity with simulator functions and capabilities and may facilitate formal operator training. However, extensive use of operations personnel will not help to expedite the certification process. It should also be noted that the activities involved with fabrication and testing will be significantly different than the activities associated with training and will be of limited value to the SONGS 1 staff beyond providing initial familiarity with the operation of the simulator.
- c. The simulator vendor is currently working to an accelerated 24 month schedule for design and fabrication. This is significantly quicker than recent industry experience. However, in view of the vendor's past performance record on projects of this type and the unique design and operating characteristics of SONGS 1, we realistically forecast the actual fabrication and testing to be completed in 30 months. Notwithstanding the above, should the vendor complete the project significantly sooner than the 30 month schedule, certification would take place at that time and the simulator would be put in service immediately depending on the status of the CRDR modification schedule.
- d. The CRDR modifications will be major modifications at SONGS 1 due to the age and configuration of our control room. Our submittal on CRDR dated December 17, 1987, describes the control room deficiencies which must be corrected. The schedule for the simulator design, fabrication, and certification is an aggressive schedule that requires early finalization of the design parameters. The final design of the CRDR modifications will be completed on a schedule that supports the incorporation of these modifications into the control room around September 1992 and cannot be made available in time to support the simulator fabrication schedule. Because of these constraints, SCE plans to implement the CRDR modifications to the simulator after it has been delivered to SCE.

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Because of the major impact of the CRDR modifications on the control room configuration, and thereby a significant effect on the training program, it is desirable to incorporate these modifications in the simulator concurrent with their incorporation in the control room. Implementation of the CRDR modifications is planned for the Cycle 12 refueling outage, which is presently expected to occur around September 1992. This date roughly coincides with simulator delivery at the end of the 30 month fabrication period. However, if there is a significant period of time between delivery of the simulator and implementation of the CRDR modifications (either because the simulator is completed prior to its 30 month schedule, or because the outage to implement the CRDR modifications is delayed), we will submit the required certification and commence operator training prior to incorporation of the CRDR modifications.

#### 4. <u>Question</u>

What is the most aggressive schedule that could be pursued by SCE for simulator certification? How much time could be saved? What would be the additional cost?

#### <u>Response</u>

Our schedule is 30 months. We recognize the importance of completing the simulator facility on an expedited schedule. Therefore, we have pursued and funded the most aggressive schedule that is reasonably possible. To that end, we have hired a dedicated project manager that will work full-time to expedite the completion, delivery and startup of the simulator at the earliest date practical. The aggressive schedule consists of the 24 month accelerated schedule which we have negotiated with the vendor, plus a six month adjustment to reflect our belief of what can actually be achieved. This adjustment is necessary due to the complexity of the project and the vendor's recent track record on meeting schedules. Based on this schedule and the appropriateness of incorporating the CRDR modification prior to operator training, the certification would take place in February 1993. However, should the simulator be actually ready for training significantly earlier than scheduled, or should the CRDR modifications be significantly delayed, the facility will be certified and used for operator training several months before the February 1993 date.

As explained above, we have planned and funded the most aggressive schedule reasonably possible. Therefore, there are no additional costs associated with this schedule.

In summary, SCE will certify the simulator at the earliest possible date that is consistent with the simulator fabrication schedule and the CRDR modifications schedule. The most realistic certification date is February 1993.