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 FACIL: 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
 AUTH. NAME AUTHOR AFFILIATION
 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 RUSSELL, W.T. Region 1, Ofc of the Director

SUBJECT: Advises that util can not meet Mar 1991 deadline to certify plant simulator to ANS 3.5-1985. R
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Pennsylvania Power & Light Company

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Harold W. Keiser
Senior Vice President-Nuclear
215/770-4194

AUG 04 1989

Mr. William T. Russell,
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
SIMULATOR CERTIFICATION
PLA-3236 FILES R41-2/P26-1A

Docket Nos. 50-387
and 50-388

Dear Mr. Russell:

The current 10CFR55 requires plant referenced simulators to be certified to ANS 3.5-1985 by March 1991. Pennsylvania Power & Light (PP&L) has concluded that it cannot meet this date. The purpose of this letter is to brief you on our situation.

Although PP&L's simulator performance has been excellent, we recognize its short comings and have determined that it would not be appropriate to certify it to 10CFR55. We have therefore, concluded that it is necessary to replace or substantially upgrade our current model. Because of the number of simulators being ordered, and our design evaluation process, PP&L cannot have a simulator which meets our design and training requirements and the criteria of 10CFR55 by March 1991. We are currently evaluating vendor proposals. This process will be completed by March 1990, at which time we will have a schedule for completion and certification of a new simulator. At that time we will submit a formal exemption request for 10CFR55.45(b)(2)(iii) to extend the plant referenced simulator certification date beyond March 26, 1991.

During the construction phase of the Susquehanna units PP&L realized that a plant simulator was necessary to adequately train and requalify licensed operators. In July 1979, PP&L accepted for use a plant simulator to train our licensed operator candidates. The success of this simulator has been amply demonstrated by our excellent operations record and licensed operator training/requalification program. PP&L's current plant specific simulator has performed satisfactorily during NRC administered licensed operator examinations since 1982. This has been demonstrated, as recently as February 1989, during both initial and requalification exams administered by the NRC at the Susquehanna Training Center.

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Additionally, PP&L considers the current administration of licensed operator examinations during the period between March 1991 and the date our simulator is certified, to be acceptable and compatible with the requirements of 10CFR55 Subpart E. This consideration is based upon the following criteria:

- o Our simulator's deficiencies are known and are compensated for by our simulator instructors, and
- o Our Operator and Senior Operator training programs are accredited and based upon a systems approach to training as defined in 10CFR55.4.

PP&L's emphasis in the design of the new simulator will be centered around successful administration of NRC operator and requalification examinations and the safe operation of the two Susquehanna units. We believe that these goals should not be jeopardized to meet the March 1991 certification date. It is with this thinking in mind that we are notifying you in advance of our intent to submit an exemption request to 10CFR55.45(b)(2)(iii).

Please contact R. D. Kichline (215-770-4181) if you have questions concerning this letter.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Resident Inspector
Mr. M. C. Thadani, NRC Project Manager

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