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SUBJECT: Comment supporting RG DG-1043, Rev 2 to RG 1.49, "NPP Simulation Facilities for Use in Operator License Exams."

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Re: Draft Regulatory Guide DG-1043
60 Fed. Reg. 36833, July 18, 1995
Request for Comments

On July 18, 1995, the Nuclear Regulatory Commission (NRC) published for public comment a draft Regulatory Guide DG-1043, "Nuclear Power Plant Simulation Facilities for Use in Operator License Examinations." The following comments are submitted on behalf of Florida Power and Light Company (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

FPL generally concurs with the positions provided in the draft Regulatory Guide. However, FPL recommends that Section 1.5, second paragraph, be clarified regarding the scope of malfunction testing. Plants whose simulators are validated to the "global failure concept" can model thousands of combinations of malfunctions. To pre-certify all of these malfunctions is not practical, and to limit scenarios to only originally certified malfunctions unduly restricts scenario flexibility. Therefore, the regulatory guide should be clarified to allow additional malfunctions to be utilized, as long as the malfunction is tested prior to use in training or examinations.

Additionally, Section 1.6 should be modified to read, "The simulator's performance of other malfunctions, component failures, and component overrides, if applicable to the facility by incorporation in the planned training and examination scenarios and exercises, should also be tested at least once every four years, approximately 25% per year, *or prior to use in training or examinations.*"

FPL appreciates the opportunity to comment on this issue.

Very truly yours,

W.H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/spt

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