

RS 114-5

DOCKET NUMBER: PROPOSED RULE PR misc notice Reg Guide

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Attention: Docketing and Service Branch

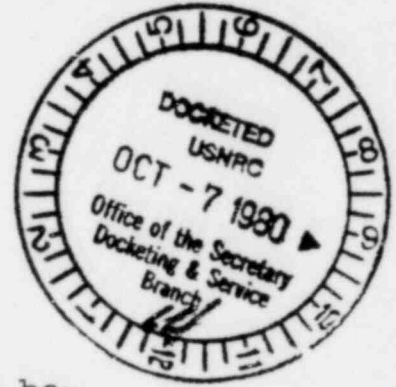
Dear Sir:

Attached are comments submitted on behalf of Pacific Gas and Electric Company regarding the draft Regulatory Guide and Value/Impact Statement titled "Nuclear Power Plant Simulators For Use in Operator Training" dated July 1980. Although the comment period has expired, I hope you can give consideration to the attached.

Very truly yours,

Philip A. Greene, Jr.

Attachment



Acknowledged by card... 10/6/80

I+P-11 Comments

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ATTACHMENT 1

COMMENTS ON DRAFT REGULATORY GUIDE
FOR "NUCLEAR POWER PLANT SIMULATORS
FOR USE IN OPERATOR TRAINING"

<u>Page</u>	<u>Section</u>	<u>Comment</u>
3	Item 3	<p>The last sentence should be modified by adding "within the limits of the performance criteria (e.g. setpoint tolerances, instrument error, etc.)." (Reason: this makes item 3 consistent with item 3.1* and eliminates the need to exactly duplicate borderline events/results on the simulator, such as a trip that might occur in the plant but not on the simulator or vice versa due to slight differences in setpoints even though both setpoints were within tolerance.)</p>
4	Item 6.a and 6.b	<p>It is agreed that panels, consoles, hardware, etc. used on the simulator should ideally be exact duplicates of the reference plant, but in some cases this may be impossible or prohibitively expensive. Minor exceptions should be allowed which will still meet the intent of these sections. (Reason: color shades, materials, switches, meters, etc. may no longer be manufactured or only available as new models. Exact duplicate may be prohibitively costly. Exact duplication should be the goal but minor exceptions should be allowed on a case basis.)</p>
4	Item 9	<p>It is not clear why this item is needed. At a minimum, the second sentence should be deleted or be revised to be consistent with the current effort to develop symptomatic emergency procedures for BWR's (and eventually for PWR's). (Reason: The guidelines for preparing symptomatic emergency procedures state: "The entry conditions for these emergency procedure guidelines are symptomatic of both emergencies and events which may degrade into emergencies. The guidelines specify actions appropriate for both. Therefore, entry into procedures developed from these guidelines is not conclusive that an emergency has occurred." Thus, just because an emergency procedure has been entered does not mean that an accident has occurred.)</p>

*3.1 of ANS 3.5