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DOCKET NUMBER
PROPOSED RULE *PR misc notice
Reg Guide*

September 9, 1980

Mr. Samuel J. Chilk
Secretary to the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Services Branch

Dear Mr. Chilk:

Reference your request for comments on proposed regulatory guide and value/impact statement, "Nuclear Power Plant Simulators for Use in Operator Training," Task RS-110-5. Our comments follow:

Draft Regulatory Guide

Section C.4:

We recommend that clarification be given regarding minimum evolutions required to be simulated under the topic, "Core Physics Testing After Load or Reload." For example, should the capability to simulate incore flex mapping or measurement of individual rod worth be required?

Section C.5:

The draft regulatory guide states; "Specific malfunctions that are to have an adjustable rate and variable severity capability should be specified by the purchaser," and then indicates that item (3), Section 3.1.2 ("loss of electrical power") of the March 1980 draft of ANSI/ANS 3.5 should include "partial or complete failures." It is recommended that the regulatory guide also include additional guidance for determining other types of partial functions that should be included in the simulator.



Acknowledged by card... *9/12/80*... *GH*

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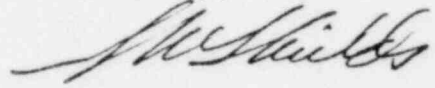
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Section C.6:

It is our observation that neither the draft regulatory guide nor the draft ANSI/ANS standard which it endorses speaks to the question of the degree to which face-front dummy hardware should be simulated, i.e., is face-front dummy hardware a requirement and to what degree must it duplicate hardware from the reference plant in shape and color?

We would be pleased to discuss the comments with you if you wish.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. W. Shields".

S. W. Shields

RSW:gb