

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 50-302

January 3, 1991
3F0191-04

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

Subject: Simulation Facility Exemption
(Generic Letter 90-08)

Dear Sir:

The purpose of this letter is to request temporary relief from the simulation facility schedule requirements specified in 10 CFR 55.45(b)(iii) and (iv). This request is made in accordance with 10 CFR 50.12(a)(2)(v). The provisions of 50.12 allow exemptions from schedular requirements if the licensee has made good faith efforts to comply with the applicable regulation. Generic Letter 90-08 reminded licensees that 10 CFR 55 requires facility licensees to certify plant referenced simulators by March 26, 1991 and that NRC administered examinations must utilize certified facilities after May 26, 1991. It also provided additional details regarding what the NRC will look for to confirm a good faith effort.

This letter discusses the requirements of 10 CFR 55.45(b), the information required by the generic letter, evidence of Florida Power Corporation's (FPC's) good faith effort, and the other information supporting the exemption request.

REQUIREMENTS

The NRC expected each facility licensee to have a simulation facility certified or approved within a reasonable time after the effective date of the May 26, 1987 revision to the training requirements. It was anticipated this would occur within 4 years following the effective date (e.g., no later than May 26, 1991). Deviations from the schedular requirements were to be addressed on a case specific basis.

Section 55.45(b)(2)(iii) requires that the information supporting certification (NRC Form 474, etc.) be submitted at least 60 days prior to the end of the 4 year period (e.g. March 26, 1991). Section 55.45(b)(2)(iv) requires that, after May 26, 1991, the simulation facility portion of the operating test be administered

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on a certified or approved simulator facility. This requirement applies to both initial licensing and requalification examinations administered by the NRC. Generic Letter 90-08 indicates the NRC will consider requests for exemptions in accordance with 10 CFR 50.12 for meeting these scheduler requirements. The generic letter requested licensees to provide the actual order dates and estimated completion dates for new or upgraded simulation facilities.

FPC's GOOD FAITH EFFORT

FPC awarded the contract for the simulator to CAE Electronics, Ltd in November, 1986. The ready-for-training date was originally scheduled for August, 1989. The contract was a joint commercial agreement which included the Sacramento Municipal Utility District (Rancho Seco) and Toledo Edison (Davis Besse). The simulator was delivered to the FPC Training Center in March, 1990. The simulator is a sophisticated, state-of-the-art system. As an example, it is capable of modeling approximately 250 malfunction scenarios in comparison with the 75 real-time abnormal and emergency conditions suggested in ANSI/ANS 3.5-1985.

FPC began to use the new simulator facility in the training program on May 28, 1990. At that time, simulator time and manpower were allocated to address the following:

- o Annual licensed operator requalification training (including FPC conducted annual requalification examinations);
- o Initial licensed operator training;
- o Training material development and validation to support the new NRC requalification examination format;
- o Simulator certification package development; and
- o Incorporation of plant modifications from the 1990 refueling outage.

During the year the simulator time and resources devoted to operator training activities have been increased. Several factors contributed to this decision.

- o Operations has requested Training to provide as much simulator training as possible. As expected, there have been significant benefits from the plant-specific simulator training in improved operator/crew performance and procedural feedback.
- o FPC has monitored other utilities' experience with the revised NRC requalification examinations. This underscored the need to provide as much simulator time as possible.
- o The simulator time and manpower required to develop superior examination materials to support the requalification process has been more than anticipated.

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The simulator time and manpower allocated toward certification were correspondingly reduced. FPC has determined the scope of performance testing to support certification. We are in the process of developing the required test procedures. To date, about 70% of these procedures have been developed. We recently began the actual performance testing.

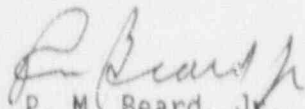
EXEMPTION REQUEST

This request for an exemption is based on schedule and manpower constraints and not on actual or anticipated simulator performance problems. FPC has complete confidence in the ability of the CR-3 simulator to meet all certification requirements. This confidence is based on: extensive factory acceptance testing conducted prior to shipment; the observed performance during the past 6 months; and the uniformly positive feedback from Operations personnel. In addition, the physical fidelity of the simulator and simulator control room environment, and the configuration management controls will meet all applicable NRC requirements and Industry Standards.

Due to the reduced resources available for the conduct of the simulator performance tests and preparation of the certification package, there is a potential that certification testing will not be completed before the required submittal date. Further, the NRC administered requalification examinations scheduled for this year will be administered after the May 26, 1991 deadline. Based on this we are requesting an extension of the required CR-3 certification submittal date from March 26, 1991 to September 27, 1991. Further, we are requesting approval to conduct NRC administered requalification examinations prior to September 27, 1991 on our facility which may not be certified.

FPC considers the utilization of our simulation facilities to be a major contributor to enhanced operator performance and plant safety. Our new facilities are among the most sophisticated in the industry. The simulator itself has recently undergone extensive, rigorous acceptance testing which has demonstrated to us the simulator's fidelity in modelling plant performance. FPC therefore, considers it prudent and in the best interest of safety to direct our resources primarily to actual training needs and to extend the completion date for certification.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:EMG

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager