

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION
P. O. BOX A
SANATOGA, PENNSYLVANIA 19464
(215) 327-1200, EXT. 3000

GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

January 31, 1991
Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Submittal of Simulation Facility Certification, Form NRC-474

Dear Dr. Murley:

Paragraph 55.45(b) of 10CFR 55 specifies that operator license examinations are to be administered, in part, either in a simulation facility consisting solely of a plant-referenced simulator that has been certified to the NRC by the facility licensee or in a simulation facility approved by the NRC after application has been made by the facility licensee. This regulation became effective on May 26, 1987, and those facility licensees which propose to conform with this regulation are required to submit a certification for use of the simulation facility to the NRC on Form NRC-474, "Simulation Facility Certification", not later than 46 months after the effective date of this regulation.

This letter serves to submit the Simulation Facility Certification on Form NRC-474 (attached), in accordance with the requirements of 10CFR 55.45(b)(5)(i), for use of the Limerick Generating Station (LGS), Units 1 and 2, plant-referenced simulator for licensed operator examinations for units 1 and 2. Additionally we are providing supporting information in Enclosure 1 which documents the ability of the LGS plant-referenced simulator to meet the requirements of 10CFR 55.45(b) and the guidance of ANSI/ANS-3.5-1985, "Nuclear Power Plant Simulators for Use in Operator Training", as qualified in NRC Regulatory Guide 1.149, "Nuclear Power Plant Simulation Facilities for Use in Operator Licensee Examinations". Any exceptions are indicated on the form NRC-474 and described in Enclosure 1.

If you have any questions, or require additional information, please do not hesitate to contact V. J. Cwietniewicz at (215) 327-1200 extension 2080.

Very truly yours,

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RPL:kml

Enclosure

cc: T. T. Martin, Administrator, Region 1, USNRC (w/o enclosure)
T. J. Kenny, USNRC Senior Resident Inspector, LGS (w/o enclosure)
Document Control Desk, USNRC, Washington, D.C. (w/o enclosure)

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SIMULATION FACILITY CERTIFICATION

INSTRUCTIONS. This form is to be filed for initial certification, recertification (if required), and for any change to a simulation facility performance testing plan made after initial submittal of such a plan. Provide the following information, and check the appropriate box to indicate reason for submittal.

FACILITY Limerick Generating Station, Unit 2	DOCKET NUMBER 50-352
LICENSEE Philadelphia Electric Company	DATE January 31, 1991

This is to certify that: 1. the above named facility licensee is using a simulation facility consisting solely of a plant-referenced simulator that meets the requirements of 10 CFR § 55.45. 2. the simulation facility meets the guidance contained in ANSI/ANS 3.5, 1986, as endorsed by NRC Regulatory Guide 1.180, and 3. documentation is available for NRC review in accordance with 10 CFR § 55.45(b). If there are any exceptions to the certification of item 2 above, check here and describe fully on additional pages as necessary.

NAME (or other identification) AND LOCATION OF SIMULATION FACILITY
Limerick Generating Station Training Center, 341 Longview Road, Linfield, PA 19468

SIMULATION FACILITY PERFORMANCE TEST ABSTRACTS ATTACHED. (For performance tests conducted in the period ending with the date of this certification.)

DESCRIPTION OF PERFORMANCE TESTING COMPLETED (Attach additional page(s) as necessary, and identify the item description being continued.)

Limerick Generating Station Unit 2 Simulator Training will be performed using the Unit 1 Training Simulator. The performance tests were run per the Unit 1 certification. Operational characteristics of Unit 2 were considered and differences which may have training impact were identified as exceptions in Tab 7 of Enclosure 1 to Form 474.

SIMULATION FACILITY PERFORMANCE TESTING SCHEDULE ATTACHED. (For the conduct of approximately 25% of performance tests per year for the four year period commencing with the date of this certification.)

DESCRIPTION OF PERFORMANCE TESTING TO BE CONDUCTED (Attach additional page(s) as necessary, and identify the item description being continued.)

Limerick Generating Station Unit 2 Simulator Training will be performed using the Unit 1 Training Simulator. The Performance Tests were run per the Unit 1 certification. The operational characteristics of Unit 2 were considered and differences which may have training impact were identified and resolved.

PERFORMANCE TESTING PLAN CHANGE (For any modification to a performance testing plan submitted on a previous certification.)

DESCRIPTION OF PERFORMANCE TESTING PLAN CHANGE (Attach additional page(s) as necessary, and identify the item description being continued.)

Not applicable

RECERTIFICATION (Describe corrective actions taken, attach results of completed performance testing in accordance with 10 CFR § 55.45(b)(5)(iv). Attach additional page(s) as necessary, and identify the item description being continued.)

Not applicable

Falsified statements or omissions in this document, including attachments, may be subject to civil and criminal sanctions. I certify under penalty of perjury that the information in this document and attachments is true and correct.

SIGNATURE OF AUTHORIZED REPRESENTATIVE 	TITLE Vice President, Limerick Gen. Station	DATE 1/31/91
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In accordance with 10 CFR § 55.5, Communications, this form shall be submitted to the NRC as follows:

BY MAIL, ADDRESSED TO: Director, Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555	BY DELIVERY IN PERSON TO THE NRC OFFICE AT: 7920 Norfolk Avenue Bethesda, MD
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SIMULATION FACILITY CERTIFICATION

INSTRUCTIONS: This form is to be filed for initial certification, recertification (if required), and for any change to a simulation facility performance testing plan made after initial submittal of such a plan. Provide the following information, and check the appropriate box to indicate reason for submittal.

FACILITY Limerick Generating Station, Unit 1	DOCKET NUMBER 60-352
LICENSEE Philadelphia Electric Company	DATE January 31, 1991

This is to certify that: 1. the above named facility licensee is using a simulation facility consisting solely of a plant referenced simulator that meets the requirements of 10 CFR § 55.45; 2. the simulation facility meets the guidance contained in ANSI/ANS 3.5, 1986, as endorsed by NRC Regulatory Guide 1.140, and 3. documentation is available for NRC review in accordance with 10 CFR § 55.45(b). If there are any exceptions to the certification of item 2 above, check here and describe fully on additional pages as necessary.

NAME (or other identification) AND LOCATION OF SIMULATION FACILITY
Limerick Generating Station Training Center, 341 Longview Road, Linfield, PA 19468

SIMULATION FACILITY PERFORMANCE TEST ABSTRACTS ATTACHED (For performance tests conducted in the period ending with the date of this certification)

DESCRIPTION OF PERFORMANCE TESTING COMPLETED (Attach additional page(s) as necessary, and identify the item description being continued)
See Tab 5 of Enclosure 1: Simulator Test

SIMULATION FACILITY PERFORMANCE TESTING SCHEDULE ATTACHED (For the conduct of approximately 25% of performance tests per year for the four year period commencing with the date of this certification)

DESCRIPTION OF PERFORMANCE TESTING TO BE CONDUCTED (Attach additional page(s) as necessary, and identify the item description being continued)
All tests required to be performed annually by ANSI 3.5 will be so performed. Please see Tab 5.4 of Enclosure 1: Performance Test Schedule, for a schedule of tests to be performed annually over the next four years.

PERFORMANCE TESTING PLAN CHANGE (For any modification to a performance testing plan submitted on a previous certification)

DESCRIPTION OF PERFORMANCE TESTING PLAN CHANGE (Attach additional page(s) as necessary, and identify the item description being continued)
Not applicable

RECERTIFICATION (Describe corrective actions taken, attach results of completed performance testing in accordance with 10 CFR § 55.45(b)(5)(iv). Attach additional page(s) as necessary, and identify the item description being continued)

Not applicable

A false statement or omission in this document, including attachments, may be subject to civil and criminal sanctions. I certify under penalty of perjury that the information in this document and attachments is true and correct.

SIGNATURE <i>[Signature]</i>	TITLE Vice President, Limerick Gen. Station	DATE 1/31/91
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