



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

February 4, 1991

Docket No. 50-219

LICENSEE: GPU Nuclear Corporation  
FACILITY: Oyster Creek Nuclear Generating Station  
SUBJECT: SUMMARY OF MEETING REGARDING GPU NUCLEAR CORPORATION'S  
EXEMPTION REQUEST CONCERNING 10 CFR PART 55 OPERATOR LICENSES

On Tuesday, January 8, 1991, a meeting was held at the NRC, One White Flint North, Rockville, Maryland with GPU Nuclear Corporation (GPUN/the licensee) to discuss the licensee's exemption request concerning 10 CFR Part 55, "Operator Licenses." Enclosure 1 is the list of participants that attended the meeting. Enclosure 2 is the licensee's agenda. The following is a summary of the significant items discussed.

In a letter dated September 5, 1990, GPUN requested an exemption from the filing requirement of 10 CFR 55.45(b)(2)(iii) to allow GPUN's submittal of NRC Form 474, "Simulation Facility Certification" after the March 26, 1991 deadline provided in the rule, but no later than December 31, 1991. In addition, GPUN further requested an exemption from the requirement of 10 CFR 55.45(b)(2)(iv), that the simulation facility portion of operating tests be administered only on a certified or approved simulation facility after May 26, 1991, to allow GPUN to continue to use the Nine Mile Point Unit 1 (NMP-1) simulator until they can certify their own.

The licensee discussed the development history of the Oyster Creek simulator and indicated that the site installation and testing will be completed by December 15, 1991. They indicated that training of the operators would begin in January 1992. In order to allow a period of time to conduct operator training on the new simulator prior to its use for examinations, GPUN proposed to delay simulator certification until June 1992. Operating license examinations on the Oyster Creek simulator would begin in August 1992.

GPUN indicated that they intend to administer the simulation facility portion of the 1991 annual operating tests for licensed operator requalification at the NMP-1 simulator during June-July 1991. The licensee had planned to conduct operating tests for two crews during the weeks of March 25 and April 1, 1991, so that Region I could follow-up on the corrective actions from the previous requalification program evaluation. However, these dates were later cancelled to avoid perturbing Oyster Creek's outage schedule. The NRC staff indicated that the impact of sending operators to the NMP-1 simulator during the outage appeared to be primarily an economic concern and not a safety issue.

GPUN advised us that they intend to amend the September 5, 1990 letter to extend the simulator certification extension date to June 1992. The staff indicated that they believed extending the certification date to June 1992 was, in the staff's opinion, too long. We further indicated that the licensee should

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provide justification for using the NMP-1 simulator after May 26, 1991, in lieu of other alternatives such as:

- 1) completing the simulation facility portion of the annual operating tests before May 26, 1991, using the NMP-1 simulator,
- 2) requesting an exemption from the requirement to use a simulator and mitigating that loss by conducting more Job Performance Measures (JPMs),
- 3) using their new simulator in limited fashion even though it may not be certified, or
- 4) any other option the licensee may determine which would avoid the need to use a non-plant-referenced simulator after May 26, 1991.

The licensee indicated that they would reconsider the schedule concerning simulator certification. GPUN also indicated that they will provide the requested information prior to February 15, 1991.

/s/

Alexander W. Dromerick, Sr. Project Manager  
Project Directorate I-4  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

## Enclosures:

1. List of Participants
2. Meeting Agenda

cc w/enclosures:  
See next page

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Document Name: MEETING SUMMARY OC

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Oyster Creek Nuclear Generating Station

Oyster Creek Nuclear  
Generating Station

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ENCLOSURE 1

DOCKET NO. 50-219  
OYSTER CREEK NUCLEAR GENERATING STATION  
MEETING JANUARY 8, 1991  
ATTENDANCE LIST

<u>Name</u>	<u>Organization</u>
A. W. Dromerick	NRR-PDI-4
G. W. Busch	GPUN - Licensing
R. J. Barrett	GPUN - Operations
G. W. Cropper	GPUN - Training
R. D. Davidson	GPUN - Simul. Mgt.
R. P. Coe	GPUN - Director, Training & Ed
Lee Bettenhausen	NRC - Reg. I/DRS/OB
Tracy Walker	NRC - Reg. I/DRS/OB
R. M. Gallo	NRC - Chief/OLB/NRR
Neal K. Hunemuller	NRC/NRR/DLPQ/LOLB
Cecil Thomas	NRC/NRR/DLPQ
J. A. Beard	NUS Corporation
B. Hughes	NRC
Mike Heller	GPUN Licensing
J. D. Kowalski	GPUN - Mgr Plant Trng. - OC
J. F. Stolz	NRC/NRR/PDI-4
W. H. Ruland	NRC/Region I/DRP
J. A. Arildsen	NRC/NRR/LHFB
Dave Lange	NRC/NRR/LOLB
Phil Scallon	GPUN - Mgr., Plant Operations

APPLICABLE REQUIREMENTS

- 10 CFR 55.45(b)(2)(iii).

SUBMIT NRC FORM 474 "SIMULATOR FACILITY CERTIFICATION"  
BY MARCH 26, 1991.

- 10 CFR 55.45(b)(2)(iv).

OPERATING TESTS MUST BE ADMINISTERED ON CERTIFIED  
SIMULATOR AFTER MAY 26, 1991.

- 52 FR 9453, MARCH 25, 1987.

ANY DEVIATIONS FROM THE TIME REQUIREMENTS OF 10 CFR  
55.45(b) WOULD BE ADDRESSED ON A CASE-SPECIFIC BASIS.

GENERIC LETTER 90-08

- NRC WILL CONSIDER EXEMPTION REQUESTS IN ACCORDANCE WITH  
10 CFR 50.12.

1. WILL CONSIDER REASONS FOR NOT MEETING SCHEDULE AND  
MEANS FOR CONDUCTING OPERATING TESTS UNTIL  
CERTIFIED SIMULATOR IS AVAILABLE.
2. SPECIAL CIRCUMSTANCES AS DESCRIBED IN 10 CFR  
50.12(a)(2) MUST BE PRESENT FOR ANY EXEMPTION TO  
BE GRANTED.



## O.C. SIMULATOR DEVELOPMENT HISTORY

<u>ACTION/ITEM</u>	<u>DATE</u>
◦ PRIOR TO NRC PROMULGATION OF THE FINAL RULE, A DETAILED SIMULATOR SPECIFICATION WAS PREPARED AND FINALIZED. SIMULATOR SPECIFICATION REQUIRES FIRST PRINCIPLES MODELING TECHNIQUES WHICH ARE MORE DIFFICULT TO ACCOMPLISH THAN TABLE LOOK-UPS, KLUDGES, GROSS SIMPLIFICATIONS, ETC. THE END RESULT HOWEVER, SHOULD BE MORE ROBUST MODELS.	05/20/87
◦ NRC RULE REQUIRING PLANT REFERENCED SIMULATOR BECAME LAW	05/27/87
◦ 5 SIMULATOR BIDS EVALUATED	9/87-01/88
◦ SIMULATOR SPECIFICATION CONFORMED WITH VENDOR	11/87-02/88
◦ SIGNED A 32 MONTH CONTRACT WITH VENDOR TO DEVELOP A CERTIFIABLE PLANT REFERENCED SIMULATOR WITH A COMPLETION DATE OF 10/17/90	02/17/88
◦ VENDOR FACTORY ACCEPTANCE TEST (FAT) COMMENCED	01/90
◦ SIGNIFICANT SCHEDULE SLIPPAGES ANNOUNCED BY VENDOR DUE TO DEVELOPMENT PROBLEMS ON THE NSS MODEL. COMPLETION DATE 4-7 MONTHS LATE	05/90
◦ CURRENT COMPLETION DATE-12/91	01/03/96

## CURRENT O.C. SIMULATOR STATUS

### ITEM

- THERE ARE STILL NUCLEAR STEAM SUPPLY (NSS) MODEL INSTABILITIES. VENDOR EXPECTS TO HAVE THEM RESOLVED AND NORMAL OPERATIONS TESTING COMPLETE BY 02/15/91. VENDOR FAT CURRENTLY ESTIMATED AS 50% COMPLETE

## PROJECTED SIMULATOR ACTIVITIES

<u>ITEM</u>	<u>DATE</u>
◦ COMMENCE 4 MONTH GPUN FAT	06/16/91
◦ PACK AND SHIP SIMULATOR	11/03/91
◦ COMPLETE SITE INSTALLATION AND TESTING	12/15/91
◦ GPUN PLANS ON COMPLETING THE SIMULATOR CERTIFICATION IN PARALLEL WITH THE TESTING. CERTIFICATION WILL BE SUBMITTED SHORTLY AFTER INSTALLATION AND TESTING.	TBD

GPUN ACTIONS TAKEN TO OBTAIN A CERTIFIABLE  
SIMULATOR ON A REASONABLE SCHEDULE

- ° CONFORMED SPECIFICATION - EXTENSIVE EFFORTS DEVOTED TO ENSURING ALL PARTIES UNDERSTOOD THE REQUIREMENTS OF THE SPECIFICATION. DOCUMENTATION REQUIREMENTS OF THE SPEC. HAVE BEEN STRICTLY ADHERED TO.
  
- ° HOLD MONTHLY PROJECT REVIEW MEETINGS (35 TO DATE)
  
- ° NUMEROUS TELECONS AND OTHER TECHNICAL MEETINGS CONDUCTED.
  
- ° GPUN HAS DEVOTED AT LEAST 14 FULL-TIME EMPLOYEES TO THE PROJECT INCLUDING A PROJECT MANAGER AND PROJECT ENGINEER, A CONTRACTS MANAGER AND A MANAGER OF SIMULATOR DEVELOPMENT. THREE FULL-TIME GPUN EMPLOYEES HAVE RESIDED ON-SITE IN PITTSBURGH SINCE JANUARY, 1989. ADDITIONAL MANPOWER HAS BEEN USED FOR ACTIVITIES SUCH AS DATA GATHERING AND Q/A AUDITS.
  
- ° QUARTERLY EXECUTIVE MANAGEMENT MEETINGS ARE HELD BETWEEN VENDOR AND GPUN DIRECTORS/VP'S TO REVIEW PROJECT STATUS.
  
- ° DIRECT COMMUNICATIONS AT THE HIGHEST LEVELS  
(ie: GPUN PRESIDENT - VENDOR DIVISION DIRECTOR  
GPUN BOARD CHAIRMAN - VENDOR EXEC. V.P.)



NINE MILE POINT PLANS  
FOR 1991 SIMULATOR TRAINING/EXAMS

ORIGINAL SCHEDULE

- 10 WEEKS RESERVED FOR LICENSED OPERATOR REQUAL  
(JULY '90)  
MAY 20, 1991 - JULY 26, 1991

REVISED SCHEDULE, REV. 1

- BASED ON NRC REGION I REQUEST (NOV. 16, 1990), TO EXAMINE TWO (2) CREWS PRIOR TO MAY 26, 1991 CHANGES WERE MADE TO SHIFT THE TWO (2) NRC SELECTED CREWS TO LATE MARCH/EARLY APRIL FOR SIMULATOR OPERATING TEST.  
WEEKS OF MARCH 25, 1991 AND APRIL 1, 1991
- THIS SHIFT WOULD IMPACT THE PLANT BASED ON EXAMS COINCIDING WITH THE PLANT OUTAGE PERIOD.  
(FEB. 15, 1991 - JUNE 6, 1991)
- ALL REMAINING CREWS TO BE EXAMINED AFTER MAY 20, 1991 PER ORIGINAL SCHEDULE.

REVISED SCHEDULE, REV. 2

- BASED ON NRC REGION I's EXPRESSED DESIRE (DECEMBER 21, 1990) TO NOT PERTURB OYSTER CREEK'S OUTAGE SCHEDULE, SIMULATOR EXAMINATION DURING WEEKS OF MARCH 25, 1991 AND APRIL 1, 1991 WERE CANCELLED.
- ALL CREWS CURRENTLY SCHEDULED FOR EXAMINATION AFTER MAY 20, 1991 PER ORIGINAL SCHEDULE.

OYSTER CREEK  
SITE SPECIFIC SIMULATOR  
KEY OPERATOR TRAINING DATES

- ACTIVITIES REQUIRED TO INCORPORATE SIMULATOR INTO TRAINING
  - CONTINUE INSTRUCTOR PROFICIENCY ON A NEW MACHINE
  - CONTINUE EXAM/TRAINING MATERIALS DEVELOPMENT
  - EXAM/TRAINING MATERIALS VALIDATION
  - INDUSTRY EXPERIENCE FROM OTHER UTILITIES HAS SHOWN THE NECESSITY TO HAVE 4 - 6 MONTHS WITH THE NEW SIMULATOR TO ADJUST THE OPERATING CREWS TO A SITE SPECIFIC SIMULATOR AND HANDLE NEW/UNFORESEEN MACHINE DISCREPANCIES.
  
- READY FOR CREW EXAMINATIONS
  - MID 1992  
(BASED ON SIMULATOR TURNOVER DATE  
+ 6 MONTHS)

## GPUN EXEMPTION REQUEST

1. REQUEST EXEMPTION FROM 10 CFR 55.45(b)(2)(iii) TO ALLOW FOR OUR SUBMITTAL OF NRC FORM 474 "SIMULATOR FACILITY CERTIFICATION" AFTER THE MARCH 26, 1991 DEADLINE.
  
2. REQUEST EXEMPTION FROM 10 CFR 55.45(b)(2)(iv) TO ALLOW GPUN TO CONTINUE TO ADMINISTER OPERATING TESTS USING THE NINE MILE POINT SIMULATOR.

SPECIAL CIRCUMSTANCES ARE PRESENT BECAUSE THE EXEMPTION WOULD PROVIDE ONLY TEMPORARY RELIEF FROM THE REGULATION AND GPUN HAS MADE GOOD FAITH EFFORTS TO COMPLY.

- ° CONTRACTED WITH VENDOR IN FEBRUARY, 1988 TO CONSTRUCT STATE OF THE ART PLANT REFERENCED SIMULATOR.
  
- ° CONTRACT INCLUDED PENALTY TO PROVIDE INCENTIVE FOR VENDOR TO MEET SCHEDULE.
  
- ° NEW SIMULATOR MANAGEMENT DEPARTMENT ORGANIZED IN MARCH, 1988 TO ACQUIRE, MODIFY, OPERATE AND MAINTAIN SIMULATOR.
  
- ° THE NINE MILE POINT SIMULATOR HAS BEEN USED FOR THE LAST SIX YEARS AND IS AN EFFECTIVE TRAINING AND EVALUATION TOOL.