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March 2, 1992
C321-92-2075

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Plant-Referenced Simulator Update

Ref: GPUN Letter C321-91-2322, "Request for Exemption from 10 CFR 55.45(b)(2)(iii) & (iv)", P.B. Fiedler to NRC Document Control Desk, dated December 6, 1991.

As a followup to our exemption request referenced above and a meeting held on January 28, 1992, this letter provides an update on the progress we have made towards obtaining a certifiable plant referenced simulator for Oyster Creek.

Due to continuing difficulties encountered by Westinghouse in modeling Oyster Creek's nuclear steam supply system (NSSS), it became necessary to pursue the purchase and development of an alternate proven NSSS model. After considerable effort, a letter of intent was signed by Westinghouse and Exitech on February 27, 1992 for Exitech to provide an alternate NSSS model. Exitech is now actively working on the alternate model. Based on our internal assessment and Exitech's guarantee, we are confident that the alternate model can be certified to meet the requirements of 10 CFR 55.45 and ANSI/ANS 3.5 1985. This is intended to be a contingency plan; the first model to work successfully will be used.

In addition, Westinghouse has added personnel to the team working on their NSSS model. This was done to complement the formal retention of General Physics to help identify what the problems are and how to resolve them.

The specific exemptions we requested in our letter referenced above are still valid. We are requesting an exemption allowing us until the end of December 1992, to certify the simulator. We are also requesting an exemption allowing us to administer operating tests on the Nine Mile Point Unit 1 (NMP-1) simulator until the new simulator's certification is complete.



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Attached is a projected training schedule for the next two years identifying the dates when a simulator would be needed. As shown in the schedule, we are proposing to conduct the 1992 annual operating test over a ten week period in August through October, 1992. Accordingly, we have made arrangements to conduct this test at the NMP-1 simulator.

In addition, our operators and STAs are scheduled to participate in the factory acceptance testing (FAT) of the plant referenced simulator in Monroeville, Pennsylvania as committed in our exemption request. Each operating crew and STA is scheduled to spend a week at the simulator; four days in FAT and one day being evaluated. This evaluation will not be part of the operating test, but will be done to emphasize procedure utilization, command and control, teamwork and communication.

As discussed at the meeting on January 28, 1992, we would prefer a simulator using the Westinghouse NSSS model rather than the alternate model. We will continue to work closely with Westinghouse to help them resolve the modeling difficulties.

If there are any further questions, please call Mr. Michael Heller, Licensing Engineer, at (609) 971-4680.

Sincerely,

C. A. Marcum

for P.B. Fiedler
Vice President and Director
Nuclear Assurance

Attachment
cc: NRC Region 1 Administrator
NRC Senior Resident Inspector
A. Dromerick

ATTACHMENT

PROJECTED SIMULATOR TRAINING SCHEDULE

| Date | Activity |
|---|---|
| Feb 1992 | SRO Certification (3 weeks) |
| July 1992 | INPO E&A Simulator Evaluation |
| Aug - Oct 1992 | Annual Operating Test (10 weeks) |
| Nov 1992 | SRO Certification (3 weeks) |
| Sept 1993 | SRO Upgrade (Tentative) |
| Oct 1993 | Annual Operating Test Begins |