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F. Collins

60FR36833
7/18/95
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RULES REVIEW DIVISION

Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

SEP 15 1995

Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publications Services
Office of Administration, Mail Stop T-6D-59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sir:

NUCLEAR REGULATORY COMMISSION (NRC) - REQUEST FOR COMMENT ON DRAFT REGULATORY GUIDE DG-1043, NUCLEAR POWER PLANT SIMULATION FACILITIES FOR USE IN OPERATOR LICENSE EXAMINATIONS (REVISION 2 TO REGULATORY GUIDE 1.149)

The Tennessee Valley Authority (TVA) has reviewed the subject draft Regulatory Guide (RG) which was noticed in the Federal Register (60FR36833-36834) and is please to provide the following comments.

The RG defines an "acceptable" method of meeting the requirements of 10 CFR 55.45. Although not a rule in itself, the RG has at least the economic force of a rule in that a substantial burden is placed on the licensee to obtain approval of an alternate method. The 10 CFR 55.45 rule specifically deals with operator exams. By including references to training in this RG, it implies a regulatory position on training which was not evaluated in the value/impact analysis conducted for the previous revision and is therefore inappropriate.

1. RG section 1.4:

The words "training and" should be deleted from the last sentence. RG section 1.2 makes clear the intention of the RG to endorse ANS 3.5-1993 as it applies to **testing**, not training. Although the extension to training makes good common sense, a regulatory position should not be established by implication.

2. RG section 1.6:

The words "training and" should be deleted from the first and second sentences.

TVA appreciates this opportunity to comment.

Sincerely,

Michael F. Carrier
Patrick P. Carrier
Manager
Corporate Licensing

cc: See page 2

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Nuclear Regulatory Commission
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cc: Mr. Jim Davis
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