W⬡LF CREEK
NUCLEAR OPERATING CORPORATION

Clay C. Warren
Vice President and Chief Operating Officer

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U. S. Nuclear Regulatory Commission
Rules and Directives Branch
Office of Administration
Washington, D. C. 20555

Reference: Federal Register, August 23, 1999
(Volume 64, Number 162)

Subject: Utility Comments on DG-1080

Gentlemen:

Attached to this letter is Wolf Creek Generating Station's comments on DG-1080, the proposed Revision 3 to Regulatory Guide 1.149, Nuclear Power Plant Simulation Facilities for Use in Operator Training and License Examinations. These comments are being submitted as requested in the August 23, 1999 Federal Register. If you have questions regarding these comments, please contact me at (316) 364-4048, or Mr. Jack Pippin at (316) 364-4166.

Very truly yours,

FOR

Clay C. Warren

CCW/rlr

Attachment

cc: J. N. Donohew (NRC), w/a
 W. D. Johnson (NRC), w/a
 E. W. Merschoff (NRC), w/a
 Senior Resident Inspector (NRC), w/a
 Public Document Room, (NRC), w/a

PDR REG&D

Comments on Draft Regulatory Guide DG-1080
(Proposed Revision 3 of Regulatory Guide 1.149)

1. C. 1. Endorsement of ANSI/ANS 3.5 - 1998, 1.1 states that facilities <u>should</u> meet the requirements of ANSI/ANS 3.5 - 1998. It should be acceptable to meet the requirements of ANSI/ANS 3.5 - 1993 as an alternative to ANSI/ANS 3.5 - 1998.

2. C. 3. Last Sentence - Licensees whose simulation facilities are currently certified under ANSI/ANS 3.5 - 1985 should be provided guidance on documenting their review of simulator programs for conformance to an active edition of the standard.

3. C. 4. Scheduling of Performance Testing - The statement is made that the licensee may reference the licensed operator training schedules of the accredited training program as adequate submittal of a schedule for conduct of approximately 25 percent per year of the performance tests required by 10CFR55.45 (b)(4)(iii) and (vii) and 10CFR55.45 (b)(5)(vi). Based on this statement, the quadrennial report will not contain a simulator malfunction test schedule. Credit for malfunction testing will be taken by use of the malfunctions in the validated scenarios of the accredited training program. The quadrennial report will only reference the accredited training program schedule.

4. ANSI/ANS 3.5 - 1998 discusses repeatability in the definitions and section 4.1.1. Specific guidance on what testing requires repeatability and what are acceptable limits of repeatability should be included.