

DS09
F. Collins
From: "Timothy C. Cassidy" <CASSITC@naesco.com>
To: OWFN_DO.owf2_po(JFC1)
Date: Mon, Nov 15, 1999 11:22 AM
Subject: Comment on DG-1080

64FR 45985

Aug. 23, 1999

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Frank,

Based upon our phone conversation last week I'm forwarding you this MANTG comment on DG-1080.

Tim(See attached file: Comment on DG 1080 rev.doc)

CC: "Jeffrey J. Cataudella" <Jeffrey_J._Cataudella%NU@...>

PDR 64FR 45985

Comment on Draft Regulatory Guide DG-1080

It is recommended that NRC provide interpretation and guidance in the regulatory guide regarding the documentation requirements of ANS 3.5 for scenario based testing.

Reason: The intent of the ANS 3.5 committee was apparently to provide for more realistic and better testing, while at the same time providing for a more cost-effective approach to the periodic testing of simulator performance. However, the documentation requirement of Section 4.4.3, *Simulator Performance Testing*, literally interpreted requires the same amount of detailed documentation, as in the past, for both the annual operability test and scenario based testing. Section 4.4.3 requires data comparison for both, and the user of the standard is referred to Appendix A for acceptable documentation practices applicable for both the annual operability tests and scenario based testing. The Appendix would require recording of critical parameters and data comparison and documented evaluations for all scenario based testing. Rather than reduce the burden from the previous malfunction based testing approach, a literal interpretation of the ANS 3.5 documentation requirement, particularly for scenario based testing, would increase the burden. This is further compounded by the apparent requirement in Section 4.4.3.2, *Simulator Scenario-Based Testing*, that all scenarios (training, examination, JPM's, etc.) be part of the ANS 3.5 testing program. Since it will be at least 3-4 more years until a revision of ANS 3.5 can be developed that may provide more clarification of the intent of the standard, it is suggested that NRC consider providing clarification in the regulatory guide. NRC may also consider providing clarification of the applicability of the repeatability requirement of the standard (section 4.1.1) to scenario based testing.