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FirstEnergy Nuclear Operating Company

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RULES & DIR. BRANCH
US NRC

November 30, 1999
PY-CEI/NRR-2446L

United States Nuclear Regulatory Commission
Rules and Directives Branch
Office of Administration
Washington, DC 20555

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

Ladies and Gentlemen:

The Perry Nuclear Power Plant (PNPP) staff commends the NRC's proposed position as stated in Draft Regulatory Guide 1080. The endorsement of ANSI/ANS-3.5-1998, "Nuclear Power Plant Simulators for Use in Operator Training and Examination," without exceptions or additions will benefit both the NRC and the operators of nuclear plant training simulators.

Though the PNPP staff agrees with the intent of the Draft Regulatory Guide, the following comments are being provided for consideration:

1. Regulatory Position 4, "Scheduling of Performance Testing": states that the requirements of 10 CFR 55.45(b)(4)(iii) and (vii), and 10 CFR 55.45(b)(5)(vi) related to submitting a report every four years that includes "a schedule for the conduct of approximately 25 percent of the performance tests per year for the subsequent four years", may be met by referencing the licensed operator training schedules of the accredited training program. The PNPP staff believes, that in the long term, less confusion will exist in the industry if 10 CFR 55 is modified to delete the reporting and test scheduling requirements.
2. The PNPP staff has reviewed letter SECY 99-225, "Rulemaking Plan for Changes to 10 CFR Part 55 to Reduce Unnecessary Regulatory Burden Associated with the Use of Simulation Facilities in Operator Licensing", and found that the proposed changes to 10 CFR 55 would also require a revision to the Draft Regulatory Guide due to revised paragraph numbering and deletion of reporting requirements referenced in the Draft Regulatory Guide. If it is the NRC's intent to implement the Regulatory Guide revision

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concurrent with the rulemaking plan, the Regulatory Guide wording must agree with the proposed text of the 10 CFR 55 change. Otherwise, assuming the revision to the Regulatory Guide is effective prior to the changes to 10 CFR 55, another revision to the Regulatory Guide must be issued concurrent with the rulemaking plan.

If you have questions or require additional information, please contact Mr. Gregory A. Dunn, Manager - Regulatory Affairs, at (440) 280-5305.

Very truly yours,

A handwritten signature in black ink, appearing to read "John K. Wood".

for John K. Wood

cc: NRC Project Manager
NRC Resident Inspector
NRC Region III