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 AUTH. NAME: AUTHOR AFFILIATION
 SORESEN, G.C. Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION

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SUBJECT: Informs NRC that Form NRC-474 certifying existing WNP-2 simulator will be submitted prior to 920630. Contractor fabricating new simulator experiencing delays. Util prefers recertification of existing simulator over addl exemption.

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 TITLE: Simulator Facility Certification

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May 21, 1992
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Docket No. 50-397

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

Gentlemen:

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21,
SIMULATOR CERTIFICATION**

Reference: a) Letter dated March 26, 1991, P.L. Eng (NRC) to G.C. Sorensen (SS),
"Schedular Exemption to 10 CFR 55.45(b)(2)(iii) for Simulation Facility
Certification"
b) Letter GO2-90-068, dated April 4, 1990, G.C. Sorensen (SS) to NRC,
"Request for Exemption From 10 CFR 55.45(B)(2)(iii) Filing Deadline,
and 10 CFR 55.45 (b)(2)(iv)"
c) Letter GO2-91-209, dated November 15, 1991, G.C. Sorensen (SS) to
P.L. Eng (NRC), "Meeting to Discuss Simulator Status"
d) Letter dated February 26, 1992, A.W. Dromerick (NRC) to GPU Nuclear
and Washington Public Power Supply System, "Summary of Audit"

In Reference (a), the U.S. Nuclear Regulatory Commission (NRC) granted the Washington Public Power Supply System (Supply System) an exemption from the requirements of 10 CFR 55.45(b)(2)(iii) which would allow for the submittal of Form NRC-474 "Simulation Facility Certification" after the March 26, 1991 deadline provided in the rule, but no later than June 30, 1992. This exemption was issued in response to an application for exemption submitted by the Supply System (Reference b).

As the NRC staff is aware, from discussions and meetings which have taken place over the past year (References c and d), the contractor fabricating the new WNP-2 simulator is experiencing delays and the simulator will not be complete and available for use at WNP-2 prior to the expiration of the exemption. The Supply System has evaluated the options and has determined that the most prudent course of action at this point is to certify the existing WNP-2 simulator as an interim step until the new simulator is delivered and installed. We believe that this course of action is preferred over requesting an additional exemption because it (1) keeps the Supply

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SIMULATOR CERTIFICATION

System's training facilities within the regulations and (2) the existing simulator has been demonstrated to be an effective training and evaluation tool.

Prior to June 30, 1992, the Supply System will submit Form NRC-474 certifying the existing WNP-2 simulator. While the simulator is an effective training and evaluation tool, we expect that there will be some areas where it will be necessary for us to take exception to the guidance provided in ANSI/ANS 3.5, as endorsed by Regulatory Guide 1.149. Justification for any exceptions will be provided as required.

While the new simulator has been under development, the Supply System has continued to make improvements to the existing simulator in order to enhance its effectiveness as a training and evaluation tool. This process will continue as long as the existing simulator is being used. We expect that the new simulator will be installed and available for use at WNP-2 by mid-1993. This is, of course, dependent upon the contractor being able to meet established schedule milestones.

Should you have any questions, please contact me at (509) 372-5238 or Mr. David Fraley at (509) 377-8166.

Sincerely,



G.C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

GCS:sn

cc: WM Dean, NRC
NK Hunemuller, NRC
JB Martin, NRC RV
LF Miller, NRC RV
NS Reynolds, Winston & Strawn
DL Williams, BPA (399)
NRC Site Inspector (901A)