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SUBJECT: Comment supporting draft RG DG-1043, "Nuclear Power Plant Simulation Facilities for Use in Operator License Exam."

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Rules Review and Directives Branch, DFIPS
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
COMMENTS ON DRAFT REGULATORY GUIDE DG-1043
NUCLEAR POWER PLANT SIMULATION FACILITIES
FOR USE IN OPERATOR LICENSE EXAMINATIONS

We appreciate the opportunity to comment on the subject draft regulatory guide DG-1043. We believe paragraphs 1.4 and 1.6 of the Regulatory Position could be clarified. Following are excerpts from 1.4 and 1.6 with our comments.

Paragraph 1.4

"*...Overrides, as defined, should be considered to be features that affect input/output (I/O) devices at the man-machine interface, such as panel instrumentation and controls. Other simulator features that might be referred to as overrides in their documentation and instructor station presentation, but which affect or alter the normal operation of simulated instrumentation or components within the model, should be considered to be malfunctions for the purposes of validation and periodic performance testing....*"

The Donald C. Cook Nuclear Plant simulator has in excess of 600 "remote functions" to support performing local actions external to the control room in accordance with paragraph 3.3.4 "Instructor Interface" of the ANSI standard. These remote functions are used as delineated in the referenced ANSI paragraph as well as for initial condition setup (condenser tube plugging, steam generator tube plugging, control air leakage, aux steam leakage, etc.). These remote functions are not manipulated except as directed by the control room operator or in initial condition setup.

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It is our position that although these remote functions "*...affect or alter the normal operation of simulated instrumentation or components in the model...*" the use of these remote functions is not as malfunctions and therefore these functions are not considered to be malfunctions for the purposes of validation and periodic performance testing.

We request that paragraph 1.4 be changed to clarify this position.

Paragraph 1.6

"*...The simulator's performance of other malfunctions, component failures, and component overrides, if applicable to the facility by incorporation in the planned training and examination scenarios and exercises, should also be tested at least once every four years, approximately 25% per year....*"

The Donald C. Cook Nuclear Plant simulator has component failures termed "Global Malfunctions." These failures apply to every air operated valve, motor operated valve, 600 VAC breaker, and 4KV breaker that can be manipulated from the control room. These failures meet the criteria set in paragraph 1.4 to be classified as malfunctions. These failures also provide the same indications as some local operator actions and are used in that capacity. An example is that a failure of a 600 VAC motor operated valve thermal overload provides the same indications and response as if the auxiliary operator opened the supply breaker to that component.

It is our position that if, in the training environment, a "Global Malfunction" is used only for local operator action, then it does not fall under the testing criteria of paragraph 1.6. Additionally it is our position that if a process is in place that tests these "Global Malfunctions" prior to use in training via validation during pre-runs, then the "*...at least once every four years, approximately 25% per year...*" does not apply. This process meets the intent to verify performance prior to observation by the operator.

We request that paragraph 1.6 be changed to clarify this position.

Sincerely,

for W. G. Smith

E. E. Fitzpatrick
Vice President

plt

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