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January 12, 1995

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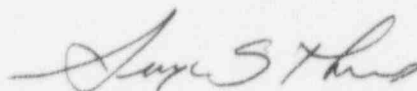
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U. S. Nuclear Regulatory Commission  
Washington, DC 20555

**Subject: NUREG-1122, Revision 1: "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors"**

Duquesne Light Company (DLC) is responsible for the operation of Beaver Valley Power Station Units 1 and 2. DLC is submitting the attached comments on revised NUREG-1122, Revision 1, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Pressurized Water Reactors." NUREG-1122 was developed to assist operator licensing examiners in the development of content valid written and operating examinations to administer to reactor plant operators and senior operators. The Knowledge and Abilities (K/A) catalog has been revised to resolve inconsistencies in content, to incorporate evolutionary changes in the operator licensing program, and to recognize a revised definition of an operator's tasks within facility licensee's organizations.

Thank you for the opportunity to comment on this issue. If you have any questions concerning the attached comments, please contact Mr. T. W. Burns, Director of Training, (412) 393-5719.

Sincerely,



George S. Thomas

## Attachment

### Comments on Draft NUREG-1122 Revision 1

#### Generic Knowledges and Abilities Section

- 2.1.1 is a broad statement that encompasses many of the other K/As in this section. It could be deleted.
- 2.1.2 through 2.1.33 would have different importance ratings depending on the system to which they were being applied. Therefore, they should not be generic, but should be listed and rated separately for each system in the catalog.
- 2.3.7 is not a task performed by operators at the Beaver Valley Power Station. The Health Physics Department performs this task. This should be investigated further to see if other utilities perform this task in a similar manner; if so, this task could be deleted.
- 2.4.10 is too broad for the importance rating to be valid. All Alarm Response Procedures are not of equal safety significance. It could be deleted since system Ability A2 will address Alarm Response Procedures separately for each system.
- 2.4.11 is too broad for the importance rating to be valid. All Abnormal Operating Procedures are not of equal safety significance. Abnormal Operating Procedures are covered separately in the Abnormal Plant Evolution section; therefore, 2.4.11 could be deleted.
- 2.4.24, 2.4.25, and 2.4.27 are redundant to the Abnormal Plant Evolution section and could be deleted.

#### Plant Systems Section

Most of the systems in the catalog need an Ability that addresses manual operation and/or monitoring the system from outside the control room in addition to Ability A4, which is to manually operate and/or monitor the system from the control room.

#### Emergency and Abnormal Plant Evolutions Section

Knowledges EK2 for Emergency Plant Evolutions and AK2 for Abnormal Plant Evolutions are too general. They should specify which components are important for the specific evolution.