



300 Madison Avenue
Toledo, OH 43652-0001
419-249-2300

John P. Stetz
Vice President - Nuclear
Davis-Besse

Docket Number 50-346

License Number NPF-3

Serial Number 2327

September 13, 1995

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Comments Regarding Draft Regulatory Guide DG-1043 (Proposed Revision 2 to Regulatory Guide 1.149), "Nuclear Power Plant Simulation Facilities For Use In Operator License Examinations"

Gentlemen:

Toledo Edison (TE), a subsidiary of Centerior Energy, is partial owner and is responsible for operation of the the Davis-Besse Nuclear Power Station (DBNPS). As a 10 CFR Part 50 licensee, TE has a vested interest in revisions to Regulatory Guides concerning the operation of the facility simulator used for operator training and licensing examinations.

Toledo Edison has reviewed the Nuclear Regulatory Commission (NRC) Draft Regulatory Guide DG-1043 (Proposed Revision 2 to Regulatory Guide 1.149), "Nuclear Power Plant Simulation Facilities For Use In Operator License Examinations", noticed in the Federal Register on July 18, 1995 (60 FR 36833). Toledo Edison endorses the industry comments being provided by the Nuclear Energy Institute (NEI) and provides the following additional comments on the Draft Regulatory Guide.

Toledo Edison is concerned that this Draft Regulatory Guide will add additional requirements of creating and maintaining a new testing program which would divert resources from operator training to simulator testing. The NRC endorses ANSI/ANS-3.5-1993 "Nuclear Power Plant Simulators for Use in Operator Training and Examinations" in the Draft Regulatory Guide. Toledo Edison believes Section 4.4.2 of the present ANSI/ANS standard provides an adequate basis for validating the continuing acceptability of a simulator for training and examinations and no additional testing is necessary or warranted.

Toledo Edison believes that formal testing of additional simulated plant malfunctions would be less effective than the current method of ensuring functional fidelity of the simulator. Toledo Edison validates simulator response programatically during the performance of "dry runs"

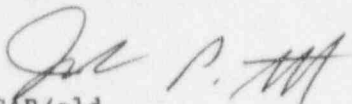
ADD 10

Docket Number 50-346
License Number NPF-3
Serial Number 2327
Page 2

on new scenarios prior to their use in training or for examinations. Discrepancies are identified and corrected prior to the further use of these scenarios. The Draft Regulatory Guide implies that the utilities would have to collect and analyze performance data for each training session to ensure that all individual malfunctions have been tested. This practice is of questionable value as variable response by operating crews does not facilitate comparison of simulator responses between scenarios or to actual plant response.

Should you have any questions or require additional information, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,


GAB/eld

cc: L. L. Gundrum, NRC Project Manager
H. J. Miller, Regional Administrator, NRC Region III
S. Stasek, DB-1 NRC Senior Resident Inspector
Utility Radiological Safety Board