

KEWAUNEE
INITIAL LICENSE EXAM

DECEMBER 11 THRU 20, 2000

NRC Comments and Resolution on
licensee submitted test outlines

COMMENTS ON KEWAUNEE OPERATING EXAM OUTLINES

General Operating Exam Comments:

1. Generally discuss the alternate path walk- through JPMs.
2. Generally discuss critical tasks for each administrative JPM.

JPM Specific Comments:

JPM Number	Comment(s)	Licensee Response
RO JPM B.2.c	What else will the RO be doing during this JPM besides tripping a valve.	The applicant will be performing a surveillance wherein they ID the TDAFW pump terry-turbine, locally trip the AFW terry turbine, then reset the overspeed trip function.
RO JPM A.1.2	The JPM (Perform Precritical Checklist for the Electrical system) references K/A 2.2.1 which is an "Equipment Control" K/A verses a "Conduct of Operations" K/A as is required by NUREG-1021.	The licensee modified the JPM discussion to indicate a K/A applicable to the Generic, Conduct of Operations section of NUREG-1122.
RO JPM A.2	What is the significance of an RO failing to complete the JPM?	The JPM will be bolstered to ensure safety-significance of the failure to properly de-select a computer point.
SRO JPM A.1.2	The JPM (Approve Fuel Movement Change) references K/A 2.2.28 which is an "Equipment Control" K/A verses a "Conduct of Operations" K/A as is required by NUREG-1021.	The licensee modified the JPM discussion to indicate a K/A applicable to the Generic, Conduct of Operations section of NUREG-1122.
SRO JPM A.2	What is the significance of an SRO missing the tag error?	The JPM will be bolstered to ensure safety-significance of the failure to ID the tag error.

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SRO JPM A.4	What are the actions required to successfully complete the JPM?	The licensee will review the JPM to ensure the critical steps provide adequate opportunities to evaluate an SRO.

Scenario Specific Comments:

Scenario #	NRC Comment(s)	Licensee Response
<u>#1</u>	<p><u>Event #4:</u> There are aspects of this event that are not clear such as :</p> <ul style="list-style-type: none"> • Is leakage inside or outside containment? • Won't the US be evaluating this leakage against the TS? • Will the US actually perform leak isolation or will he/she opt to simply perform a shutdown? If no leak isolation actions are taken then we could not give credit for a component failure. <p><u>Event #6:</u> In an emergency situation, the US is likely to allow the remaining diesel generator to run to failure. If this is the case than no credit can be given for this component failure.</p> <p><u>Critical Task #3:</u> What is the significance of isolating RCP seal injection before a charging pump starts or is started?</p>	<p>- Leakage is into the auxiliary building above the isolation valves.</p> <p>- The SRO may evaluate the leakage verses the TS requirements while isolation is going on. a TS review will be performed later in the scenario anyhow.</p> <p>- Licensee stated that they were certain that the operators will direct that the leak be isolated. The station's procedures also will dictate this be done.</p> <p>- ECA 0.0 requires system alignments be performed giving the evaluator actions to evaluate.</p> <p>- Isolating the RCP seal injection prevents damaging the seal package once charging is re-started.</p>

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<u>#2</u>	<p><u>Initial Conditions/Turnover:</u> It appears that two channels of pressurizer level have been taken out of service. This would require an entry into TS 3.0.3.</p> <p><u>Event #3:</u> If pressurizer level channel fails high, the feed reg valve should close NOT open as is discussed. This will change the discussion of expected plant response. Won't the US be evaluating this failure against TS?</p> <p><u>Event #6:</u> There does not appear to be any actions required to address this component failure. It just happens.</p> <p><u>Enhancement:</u> The suggested leakage rate from the ruptured tube is 250 gpm. With a critical task of preventing exceeding 98% SG level, a larger leakage rate (approaching design leakage of 450 gpm) may be necessary to evaluate this within the time allotment.</p>	<p>- The IC will be changed such that only 1 channel of pressurizer level is taken OOS.</p> <p>- The write-up will reflect the fact that the FRV will close, lowering SG level.</p> <p>- Will re-evaluate BOP actions to see if credit can be given for responding to this failure.</p> <p>- Pressurizer level and subcooling limits will be bounding at this point.</p>

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<u>#3</u>	<p>Event #8: There are no actions required to address this event, could not give credit of the component failure.</p> <p>ENHANCEMENT: Recommend that scenario be changed to require that the MSIVs be shut manually in order to trip the turbine. This would give the examiners an opportunity to evaluate the BOP's actions.</p>	<p>- Keeping the MSIVs open will require the BOP to trip the EHC pumps and manually close the control valves.</p> <p>N/A</p>
<u>SPARE</u>	<p>Event #3: There does not appear to be any actions required to address this event. Actions are masked by actions taken to address event #2. No credit could be given for this component failure.</p> <p>Event #5: There is only one action required to address this issue (turn a switch). This makes it difficult to evaluate the BOP's performance.</p> <p>ENHANCEMENT: Recommend that the scenario be changed to either require an operator to locally close the SG PORV or fail a SG safety valve instead. If the PORV has to be closed locally or a SG safety is failed open, timely ID and direction from the US will be required to prevent overfill and release to the public. This would be an ideal evaluation tool.</p>	<p>- The operator will have to take manual control of the charging pump to restore pressurizer level.</p> <p>N/A</p> <p>- There is more to this; the PORV will not close from the control room. The SRO will have to dispatch an AO to locally close the PORV.</p>