

NRC COMMENTS TO ADMINISTRATIVE AND WALKTHROUGH JPMS

FOR THE BRAIDWOOD INITIAL EXAMINATION - OCTOBER 2000

Braidwood JPM Exam Review 11/14/00

Administrative JPM's

A.1.a (Admin #1) Temp Mon SI Conduct of Ops - KA 2.1.33 (BOTH)

NRC Comment:

-Level of difficulty (LOD) is too low, currently only one critical step. LOD could be improved by performing the surveillance in the plant.

Licensee Response:

-this is a surveillance task with Tech Spec item, only one step is marked critical (asterisk); however, the standard breaks the step into 6 items (solid bullets) that must be performed. As written, this task meets requirements of KA 2.1.33. Requiring the applicant to locate readings in the plant would significantly increase the time to perform the surveillance and the only additional information gained would be applicant's knowledge of, or ability to locate, the readings.

NOTE: Due to potential security issue on 6/14/00, while no exam compromise was identified, Admin JPM 143 was removed and replaced with this one.

NRC Resolution: Accept the admin JPM as written.

A.1.b (Admin #2) Manual Entry of Late Log Entry - KA 2.1.18 (BOTH)

NRC Comment:

The JPM must be replaced or modified.

-LOD is too low.

-JPM does not contain sufficient safety significance and does not contain adequate justification for denying an applicant's license (ref. ES-301, D.1.d). The JPM safety significance could be improved by requiring review of logs that had missed identification, documentation, and resolution of a TS item or the like.

Licensee Response:

This was previously accepted on a Zion exam. Will look at enhancing the admin JPM by incorporating safety significance (TS item?).

NRC Resolution: JPM replaced with "Respond to a Plant Fire Alarm (N-09).

A.3 (Admin # 4) RCA Entry/Exit - KA 2.3.1 (BOTH)

NRC Comment:

JPM needs clarification.

Need to clarify performance standards, as written:

-Insufficient safety significance or adequate justification for denying an applicant's license (ref. ES-301, D.1.d).

-Critical steps inappropriately identified for applicant to "verify read and sign...; and verify dosimetry...."

-Critical steps that don't give sat/unsat standards: "gain authorized access...; successfully pass through AB...; obey posted signs...; maintain exposure ALARA; utilize personal monitor to exit...; utilize log out system..."

Licensee Response:

Will clarify task standards.

NRC Resolution: Write JPM for identification of personnel contamination during RCA exit.

A.4 (Admin # 5 SRO) GSEP classification - KA 2.4.41

NRC Comment:

JPM needs clarification.

How difficult is the proposed classification? What "scenario?" Don't want to use Scenario 00-2, UE. Who will get what? What happens if applicant under/ classifies, failure? Not enough information was submitted for evaluation of the JPM. We need specifics.

Licensee Response:

Applicants would classify event after the scenario in which they are in the SRO position.

Would expect applicant to identify highest level of classification, only need to identify 1 of 2 (or more) conditions for that classification. No PARs required for General Emergency classification.

NRC Resolution: Will use on scenarios: 00-1, 00-3, 00-4, 00-5, and 00-8 with SRO applicants in the SRO position.

A.4 (Admin # 5 RO) Emergency Plan Exposures/Facilities questions - KA 2.4.29

Question #1:

NRC Comment:

-As written the question is listed as open-reference. However, the question is a direct look-up (radiation exposure limits) which is not allowed (ref. ES-301, Attachment 1, Step 6).

-determine that emergency limits apply, then look-up limits. Inability to repeat exposure limits is not adequate justification for denying an applicant's license (ref. ES-301, D.1.d).

-The question copy handed to the applicant does not match the examiner question asked (ie, JPM page 1 and 3 questions don't match).

Licensee Response:

Not a direct lookup, question requires three main parts: applicant must 1) determine if "emergency equipment;" 2) look-up emergency limits; 3) do calculation (includes lens of eyes plus extremities).

Will correct copy to applicant.

NRC Resolution: Accept the admin question with corrections.

Question #2:

NRC Comment:

Replace or rewrite question.

-As written the question is listed as open-reference. However, the question is a direct look-up (assembly area location) which is not allowed (ref. ES-301, Attachment 1, Step 6). Information on posted signs or back of ID badges?

-Low LOD. Non-discriminatory. Better to make scenario of operator on shift during some emergency, need maintenance support with something, where do you go, who do you call, how do you call?

Licensee Response:

Previously used on Byron exam. Information not posted signs or back of ID badges.

Reference the RO items submitted with the sample plan, take out what was asked on the previous NRC exam and the cert exam, and this is all that is left to ask ROs in the GSEP area.

Per the Sample Plan: A.4 Emergency Plan/Emergency Plan Directions for RO

Cert Exam: Emergency exposure for saving equipment.

NRC Exam: Emergency exposure for saving lives.

The same reference is used for both questions.

Justification:

1. The stems of the questions are different
-ALERT vs GENERAL EMERGENCY
-Injured man containment vs isolating valve
2. Answers are different (if same answer that was on cert exam is selected on NRC exam, then question is answered incorrectly)

RO TASK	LAST USED
ZP-001 Perform site emergency plan duties.	1999 cert; 2000 cert
ZP-002 Operate the GSEP communications system.	1999 NRC re-exam
ZP-006 Use procedures during GSEP event.	1999 re-cert; 2000 cert
ZP-007 On-going emergency communications.	1999 re-cert, 1999 NRC

Ref. ES-301, Section D.1.a, para.3:

Simulator events and JPMs that are similar to those that were tested in the audit examination are permitted provided the actions required to mitigate the transient or complete the task (alternate path) are significantly different from those required during the audit examination. The facility licensee shall identify for the NRC chief examiner those simulator events and JPMs that are similar to those that were tested in the audit examination.

NRC Resolution: Accept the question.

SYSTEM JPMs

NRC Overall Comments:

1. The licensee identified 5 alternate path JPMs, but ES-301, Section D.3.b, states only 4/10 will be alternate path.

SIMULATOR JPM's

B.1.a Place Excess Letdown in Service With Failure of Cooling to !A L/D HX (N-11, MAS)

NRC Comment:

Not alternate path.

What is the significance if applicant doesn't close 1HCV-123? Why is "Dispatches operator to investigate local valve lineup." not critical, ie, who would provide feedback on CC flow? As written, the operator requests information that identifies the problem, then is directed to shutdown Excess Letdown by an SRO, which is not considered procedurally directed or alternate path. Should the operator be knowledgeable enough to make the decision to shutdown Excess Letdown? Could the examiner ask applicant for recommendation (ie, recommend shutdown of excess L/D?).

Licensee Response:

There is no cooling to the L/D HX, so by closing 1HCV-123, excess L/D is secured (no heat input to HX). Dispatching an operator is not critical, applicant doesn't need information about flow indication. The operator has to notify the SS per administrative procedure. Shutting 1HCV-123 is not driven by operating procedure, but operator is "using common practices/policies."

NRC Resolution: Accept JPM.

B.1.b Drain PRT with Failure of 1B RCDT Pump (N-119, MAS)

NRC Comment:

Rewrite

-Step 3 is incorrectly identified as critical ("Verify...")

-JPM does not match outline description. No failure of the 1B RCDT Pump occurred, consequently, the JPM is not alternate path.

Licensee Response:

-Step 3, "Verify/Open" tells operator that if valve is not open, to open it.

-will need to rewrite Step 6 (time compression, remove examiner cues, ramp meter, trip prior to "0" psi?). No failure of 1B RCDT pump. Not alternate path.

NRC Resolution: JPM re-written, not alternate path.

B.1.e Respond to Loss of 4KV ESF Bus 141 (Restore Bus 142 From Bus 242) (N-99, DS)

NRC Comment:

This JPM overlaps Scenario 00-5, Event #6 and Scenario 00-7, Event #5.

Licensee Response:

Scenarios' 00-5, Event #6 doesn't get Bus 141 back, taking action for lost equipment. JPM is re-energizing bus, not taking action for lost equipment. Scenario 00-7, Event #5 doesn't get bus back. Task conditions require different method of re-energizing bus. Fault prevents crosstie of buses.

NRC Resolution: Replace with another electrical bus line-up JPM.

B.1.g SR Instrument Failure in Mode 4 (N-141, NSLA)

NRC Comment:

Need clarification of initial conditions and initiating cue. What was operator working on, when did first, then second SR fail, what is the alternate path? (JPM ok as long as N-32 fails after the applicant has assumed the watch; otherwise, JPM is not alternate path. There is a potential for a long turnover since in Mode 5.)

Licensee Response:

JPM starts in Mode 5, 1 NI is out, I&C have already taken actions. Operator needs to address actions for failure of a second NI. Alternate path is transition to RNO in Step 4.

NRC Resolution: Accept the admin JPM as written.

IN PLANT JPM's

B.2.a Local Emergency Boration With Emergency Boration Valve Failed Closed (N-89, MAR)

NRC Comment:

Replace or rewrite

-This JPM overlaps Scenario 00-6, Event #2.

-Does not meet requirements of alternate path (ref. Appendix C, Section C). The initial conditions tell the applicant that the filter is clogged, and the initiating cue directs the applicant to establish emergency boration flowpath per a procedure.

-Although potentially high safety significance, LOD is low and little examiner evaluation because applicant only required to manipulate 2 valves. JPM does not contain adequate justification for denying an applicant's license (ref. ES-301, D.1.d).

Licensee Response:

Both cases have a clogged filter, but the scenario requires a local operator to open filter bypass valve. JPM requires a local operator to establish emergency boration (open 2CV8104).

NRC Resolution: Accept the JPM as written, but not accept as alternate path.

B.2.b Emergency Control of 2A SX Pump (N-67, D)

NRC Comment:

Replace or rewrite

-Accept this JPM as alternate path.

Licensee Response: Agree.

NRC Resolution: Accept the JPM as alternate path.