

*CLINTON*  
INITIAL LICENSE EXAM

JULY 16 THRU 23, 2001

NRC Review Comments on Facility-  
Developed Written Examination and  
Operating Test

(See ES-401-9 for NRC Review  
Comments on Facility-Developed  
Written Examination)

**COMMENTS ON CLINTON OPERATING EXAM**

JPM/Scenario Event Number	Comment(s)
<p align="center">A.1.a (RO) (core alt. surveillance log)</p> <p align="center">ENHANCEMENT</p>	<p><u>NRC:</u>           The Task Standard should also state the requirement to identify the problems with the SRMs. <i>NUREG-1021, Appendix C defines a Task Standard as the predetermined outcome against which task performance will be measured.</i></p> <p><u>LICENSEE RESPONSE:</u>   The Task Standard was updated.</p>
<p align="center">A.1.b (RO) (determine if core pwr, flow, or thermal limits exceeded)</p> <p align="center">ENHANCEMENT</p>	<p><u>NRC:</u>           The Task Standard should also state the requirement to identify that MFLCPR and MFLPD are &gt; 1.0. <i>NUREG-1021, Appendix C defines a Task Standard as the predetermined outcome against which task performance will be measured.</i></p> <p><u>LICENSEE RESPONSE:</u>   The Task Standard was updated.</p>

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JPM/Scenario Event Number	Comment(s)
<p align="center">A.2 (RO) (perform rest. from rpi testing)</p> <p align="center"><b>ENHANCEMENTS</b></p>	<p><u>NRC:</u> The Task Standard should also state the requirement to identify the mis-aligned control rod. <i>NUREG-1021, Appendix C defines a Task Standard as the predetermined outcome against which task performance will be measured.</i></p> <p><u>LICENSEE RESPONSE:</u> The Task Standard was updated.</p> <p><u>NRC:</u> Step 8.1.4 of CPS 9011.01 states that the CORE MAP is on page 7. The CORE MAP is actually on page 8.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and has since corrected the procedure.</p>
<p align="center">A.3 (RO) (determine dose)</p> <p align="center"><b>UNSAT,</b></p>	<p><u>NRC:</u> The task does not match the stated K/A. K/A 2.3.10 states "Ability to perform procedures to reduce excessive levels of radiation and guard against personnel exposure." This task simply requires the applicant to determine expected dose. As such, the applicant's knowledge of responsibilities concerning exposure control are not tested. <b>This JPM is considered UNSAT.</b></p> <p><u>LICENSEE RESPONSE:</u> The JPM was upgraded to require the applicant to make a decision concerning whether or not he/she would exceed the Station's administrative control limit for exposure. This additional action test's the applicant's ability to perform procedures to reduce excessive levels of radiation and guard against personnel exposure.</p>

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<p align="center">A.1.b (SRO) (determine if core pwr, flow, or thermal limits exceeded)</p> <p align="center">ENHANCEMENT</p>	<p><u>NRC:</u> The Task Standard should also state the requirement to identify that MFLCPR and MFLPD are &gt; 1.0. <i>NUREG-1021, Appendix C defines a Task Standard as the predetermined outcome against which task performance will be measured.</i></p> <p><u>LICENSEE RESPONSE:</u> The Task Standard was updated.</p>
<p align="center">A.2 (SRO) (perform rest. from rpi testing)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> Step 1 of the JPM requires the applicant to identify that control rod 28-29 is marked "N/A" and should have been exercised, but was not. Control rod 28-29 is not marked "N/A" on the CORE MAP (must therefore be fully withdrawn and not require testing).</p> <p><u>LICENSEE RESPONSE:</u> The JPM was modified to mark control rod 28-29 as "N/A."</p> <p><u>NRC:</u> Step 8.1.4 of CPS 9011.01 states that the CORE MAP is on page 7. The CORE MAP is actually on page 8.</p> <p><u>LICENSEE RESPONSE:</u> The procedure was updated.</p>

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<p align="center">A.4 (SRO) (determine pars)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> As written, requires the applicant to perform similar actions twice. Recommend giving the applicant a completed NARS that states initial event classification (GE) and PARS and requiring him/her to reclassify the event and determine PARS based on a shift in wind direction. In doing so the examiner will observe an event classification, a PARS determination, and a time critical (15 minute) event reclassification.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and modified the JPM.</p> <p><u>NRC:</u> Initiating Cue should state that "RPV level is less than TAF..."</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and modified the JPM.</p>
<p align="center">B.1.b (startup mdrfp)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> Step 8.1.3.5 of the JPM requires the applicant to raise RPV level to high in the control band. JPM should include a cue establishing the required RPV control band.</p> <p><u>LICENSEE RESPONSE:</u> The licensee updated the initiating cue to include the required control band.</p>

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<p align="center">B.1.c (defeat group 1 isolation)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> The Initiating Cue should state the reason for defeating the MSIV/MSL drain Group I isolation.</p> <p><u>LICENSEE RESPONSE:</u> The initiating cue was updated to include a reason for defeating the Group I isolation.</p> <p><u>NRC:</u> The JPM should include a step requiring the applicant to physically locate and obtain the required jumpers.</p> <p><u>LICENSEE RESPONSE:</u> The JPM was updated to require the applicant to physically locate and obtain the required jumpers.</p>
<p align="center">B.1.d (manually start lpcs)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> The Task Standard should also state the requirement for the applicant to identify the failure of the LPCS system to initiate and to take appropriate actions to start LPCS. <i>NUREG-1021, Appendix C defines a Task Standard as the predetermined outcome against which task performance will be measured.</i></p> <p><u>LICENSEE RESPONSE:</u> The Task Standard was updated.</p> <p><u>NRC:</u> The JPM should indicate that this is an alternate path JPM, particularly in the step where the transition to another step or procedure takes place.</p> <p><u>LICENSEE RESPONSE:</u> The JPM was updated to clearly indicate the location of the alternate path.</p>



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<p align="center">B.1.f (shifting rad monitors)</p> <p align="center"><b>UNSAT<sub>3</sub></b></p>	<p><u>NRC:</u>           The failure to properly transfer a rad monitors appears to be of little <b>consequence</b>. <i>NUREG-1021, ES-303 requires that the consequences of an applicant's actions to be included in the justification for failure.</i> If shifting the rad monitors were required to meet technical specifications, consequence could be demonstrated.</p> <p><u>LICENSEE RESPONSE:</u>   The JPM was upgraded such that the realignment of the rad monitors was required to satisfy Tech Spec requirements.</p>



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<p align="center">B.2.a (locally open scram brkrs)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> Step 1 of the JPM states to deenergize 1C71-P011B, breakers CB23 through 26. CPS 4411.08 states that breakers CB23 through 36 are to be placed in off.</p> <p><u>LICENSEE RESPONSE:</u> The JPM was modified to indicate that breakers CB23 through 36 are to be placed in off.</p>
<p align="center">B.2.b (locally start h<sub>2</sub> recombiner)</p> <p align="center">ENHANCEMENTS</p>	<p><u>NRC:</u> Containment pressure should be given in the cue.</p> <p><u>LICENSEE RESPONSE:</u> The initiating cue was updated to include containment pressure.</p> <p><u>NRC:</u> The cue provided in step 2.5.1 of the JPM should indicate whether containment water level is increasing, decreasing or remaining the same.</p> <p><u>LICENSEE RESPONSE:</u> The cue in step 2.5.1 was updated to state that containment water level was "19 feet, 6 inches, and steady."</p>



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<p align="center">Scenario Two</p> <p align="center">ENHANCEMENTS</p> <p align="center">Events 1 through 6</p>	<p><u>NRC:</u>            Include a list of symptoms for each event. <i>NUREG-1021, ES301, Form ES 301-4, Item 3 states "Each event description consists of...the symptoms/cues that will be visible to the crew..."</i></p> <p><u>LICENSEE RESPONSE:</u>    Symptoms were included.</p> <p><u>NRC:</u>            Event 10, "Trip of the "A" RHR Pump," cannot be credited to the BOP as a component failure since actions required to recover from the Event will have already been taken as a result of Event 9, "Failure of the "B" RHR pump to start."</p> <p><u>LICENSEE RESPONSE:</u>    The BOP operator was removed as being credited during this event.</p>
<p align="center">Scenario Three</p> <p align="center">ENHANCEMENTS</p> <p align="center">Events 1 through 5</p>	<p><u>NRC:</u>            Include a list of symptoms for each event. <i>NUREG-1021, ES301, Form ES 301-4, Item 3 states "Each event description consists of...the symptoms/cues that will be visible to the crew..."</i></p> <p><u>LICENSEE RESPONSE:</u>    Symptoms were included.</p>