

NRC COMMENTS ON THE INITIAL SUBMITTAL

OF THE WRITTEN EXAMINATION AND OPERATING TESTS

FOR THE CLINTON INITIAL EXAMINATION - JULY/AUG 2002

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q# K/A	SRO Only		
1.*	H	2												S	Q=K/A and reference material reviewed.
2.*	F	4												E	See attached Comments, Q=K/A, and reference material reviewed.
3.*	H	3												S	Q=K/A and reference material reviewed.
4.*	H	3												S	Q=K/A and reference material reviewed.
5.*	F	2												S	Q=K/A and reference material reviewed.
6.*	F	3												E	See attached comments, Q=K/A, and reference material reviewed.
7.*	F	3	X											U	See attached comments, Q=K/A, and reference material reviewed.
8.*	H	3												E	See attached comments, Q=K/A, and reference material reviewed.
9.*	F	3												S	Q=K/A and reference material reviewed.
10.*	F	3												E	See attached comments, Q=K/A, and reference material reviewed.

Instructions

[Refer to Section D of ES-401 and Appendix B for additional information regarding each of the following concepts.]

- Enter the level of knowledge (LOK) of each question as either (F)undamental or (H)igher cognitive level.
- Enter the level of difficulty (LOD) of each question using a 1 - 5 (easy - difficult) rating scale (questions in the 2 - 4 range are acceptable).
- Check the appropriate box if a psychometric flaw is identified:
 - The stem lacks sufficient focus to elicit the correct answer (e.g., unclear intent, more information is needed, or too much needless information).
 - The stem or distractors contain cues (i.e., clues, specific determiners, phrasing, length, etc).
 - The answer choices are a collection of unrelated true/false statements.
 - More than one distractor is not credible.
 - One or more distractors is (are) partially correct (e.g., if the applicant can make unstated assumptions that are not contradicted by stem).
- Check the appropriate box if a job content error is identified:
 - The question is not linked to the job requirements (i.e., the question has a valid K/A but, as written, is not operational in content).
 - The question requires the recall of knowledge that is too specific for the closed reference test mode (i.e., it is not required to be known from memory).
 - The question contains data with an unrealistic level of accuracy or inconsistent units (e.g., panel meter in percent with question in gallons).
 - The question requires reverse logic or application compared to the job requirements.
- ~~Check the appropriate box if the sampled question does not match the approved K/A or an SRO-only question is not at the SRO level.~~
- Based on the reviewer's judgment, is the question as written (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory?
- For any "U" ratings, at a minimum, explain how the Appendix B psychometric attributes are not being met.

* Question used for "30 question" initial review.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q K/A	SRO Only		
11.*	F	4												S	Q=K/A and reference material reviewed.
12.*	F	3												E	See attached comments, Q=K/A, and reference material reviewed.
13.*	H	3												E	See attached comments, Q=K/A, and reference material reviewed.
14.*	H	3												S	Q=K/A and reference material reviewed.
15.*	F	3												E	See attached comments, Q=K/A, and reference material reviewed.
16.*	H	3												E	See attached comments, Q=K/A, and reference material reviewed.
17.*	H	3				X								U	See attached comments, Q=K/A, and reference material reviewed.
18.*	F	3												S	Q=K/A and reference material reviewed.
19.*	H	3												S	Q=K/A and reference material reviewed.
20(ro).*	H	4												S	Q=K/A and reference material reviewed.
21.*	H	3												S	Q=K/A and reference material reviewed.
22.*	F	2												S	Q=K/A and reference material reviewed.
23.*	H	3												S	Q=K/A and reference material reviewed.
24.*	F	3												S	Q=K/A and reference material reviewed.
25.*	F	2												S	Q=K/A, and reference material reviewed.
26.*	H	3												S	Q=K/A and reference material reviewed.
27.*	H	3												S	Q=K/A and reference material reviewed.
28.*	F	3												S	Q=K/A and reference material reviewed.
29.*	H	3				NCA								U	See attached comments, Q=K/A, and reference material reviewed.
30.*	H	3												S	Q=K/A and reference material reviewed.

* Question used for "30 question" initial review.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws					5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q K/A	SRO Only			
31.	F	3				NCA									U	See attached comments, Q=K/A, and reference material reviewed.
32.	H	3													S	Q=K/A and reference material reviewed.
33.	F	3													S	Q=K/A and reference material reviewed.
34(ro).	H	4													S	Q=K/A and reference material reviewed.
35.	F	2										X			U	See attached comments, Q=K/A, and reference material reviewed.
36.	H	3													S	Q=K/A and reference material reviewed.
37.	F	2													S	Q=K/A and reference material reviewed.
38.	F	3													S	Q=K/A and reference material reviewed.
39.	F	3													S	Q=K/A, and reference material reviewed.
40.	F	3													E	See attached comments, Q=K/A, and reference material reviewed.
41.	F	3													S	Q=K/A and reference material reviewed.
42.	F	3													S	Q=K/A and reference material reviewed.
43.	F	3													S	Q=K/A and reference material reviewed.
44.	F	3													S	Q=K/A and reference material reviewed.
45.	H	3													S	Q=K/A and reference material reviewed.
46.	H	3													S	Q=K/A and reference material reviewed.
47.	H	3													S	Q=K/A and reference material reviewed.
48.	H	3													S	Q=K/A and reference material reviewed.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job-Link	Minutia	#/ units	Back-ward	Q≠ K/A	SRO Only		
49.	H	3												E	See attached comments, Q=K/A, and reference material reviewed.
50.	H	3												S	Q=K/A and reference material reviewed.
51.	F	3												S	Q=K/A and reference material reviewed.
52(ro).	F	3				NCA								U	See attached comments, Q=K/A, and reference material reviewed.
53.	F	5						X						U	See attached comments, Q=K/A, and reference material reviewed.
54.	H	3				X								U	See attached comments, Q=K/A, and reference material reviewed.
55.	H	3												S	Q=K/A and reference material reviewed.
56.	H	3												S	Q=K/A and reference material reviewed.
57.	H	4												S	Q=K/A and reference material reviewed.
58.	H	3						X						U	See attached comments, Q=K/A, and reference material reviewed.
59.	F	3												E	See attached comments, Q=K/A, and reference material reviewed.
60.	H	3												S	Q=K/A and reference material reviewed.
61.	H	3												S	Q=K/A and reference material reviewed.
62.	F	3												S	Q=K/A and reference material reviewed.
63.	H	3										X		U	See attached comments, Q=K/A, and reference material reviewed.
64.	F	4												S	Q=K/A and reference material reviewed.
65.	F	4												S	Q=K/A and reference material reviewed.
66.	F	4												S	Q=K/A and reference material reviewed.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q ≠ K/A	SRO Only		
67.	F	3												S	Q=K/A and reference material reviewed.
68.	H	3												S	Q=K/A and reference material reviewed.
69(ro).	H	3												S	Q=K/A and reference material reviewed.
70.	H	3												S	Q=K/A and reference material reviewed.
71.	H	3												S	Q=K/A and reference material reviewed.
72.	H	3												S	Q=K/A and reference material reviewed.
73.	H	3												S	Q=K/A and reference material reviewed.
74.	F	2												S	Q=K/A and reference material reviewed.
75.	F	2												S	Q=K/A and reference material reviewed.
76.	F	3												S	Q=K/A and reference material reviewed.
77.	F	3												S	Q=K/A and reference material reviewed.
78.	F	3												S	Q=K/A and reference material reviewed.
79(ro).	F	3												S	Q=K/A and reference material reviewed.
80(ro).	H	2												S	Q=K/A and reference material reviewed.
81(ro).	F	2												S	Q=K/A and reference material reviewed.
82(ro).	H	3												S	Q=K/A and reference material reviewed.
83(ro).	H	4												S	Q=K/A and reference material reviewed.
84(ro).	H	3												S	Q=K/A and reference material reviewed.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q≠ K/A	SRO Only		
85(ro).	H	3										X		U	See attached comments, Q=K/A, and reference material reviewed.
86(ro).	H	3										X		U	See attached comments, Q=K/A, and reference material reviewed.
87(ro).	H	4												S	Q=K/A and reference material reviewed.
88(ro).	H	3												S	Q=K/A and reference material reviewed.
89(ro).	H	3												S	Q=K/A and reference material reviewed.
90(ro).	H	4												S	Q=K/A and reference material reviewed.
91(ro).	H	3												S	Q=K/A and reference material reviewed.
92(ro).	F	3												S	Q=K/A and reference material reviewed.
93(ro).	F	3												E	See attached comments, Q=K/A, and reference material reviewed.
94(ro).	F	2												E	See attached comments, Q=K/A, and reference material reviewed.
95(ro).	F	3					X							U	See attached comments, Q=K/A, and reference material reviewed.
96(ro).	H	3												S	Q=K/A and reference material reviewed.
97(ro).	H	3												S	Q=K/A and reference material reviewed.
98(ro).	H	3												S	Q=K/A and reference material reviewed.
99(ro).	F	3		-		NCA								U	See attached comments, Q=K/A, and reference material reviewed.
100(ro).	F	3												S	Q=K/A and reference material reviewed.
101(sro).	H	3										X	X	U	See attached comments, Q=K/A, and reference material reviewed.
102(sro).	H	3												S	Q=K/A and reference material reviewed.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job-Link	Minutia	#/units	Back-ward	Q ≠ K/A	SRO Only		
103(sro).	F	3											X	E	See attached comments, Q=K/A, and reference material reviewed.
104(sro).	H	3												S	Q=K/A and reference material reviewed.
105(sro).	H	3				NCA								U	See attached comments, Q=K/A, and reference material reviewed.
106(sro).	H	3												S	Q=K/A and reference material reviewed.
107(sro).	F	2												S	Q=K/A and reference material reviewed.
108(sro).	H	3												S	Q=K/A and reference material reviewed.
109(sro).	F	4												S	Q=K/A and reference material reviewed.
110(sro).	H	3												S	Q=K/A and reference material reviewed.
111(sro).	H	3												S	Q=K/A and reference material reviewed.
112(sro).	F	3												S	Q=K/A and reference material reviewed.
113(sro).	H	3		X										U	See attached comments, Q=K/A, and reference material reviewed.
114(sro).	F	4											X	U	See attached comments, Q=K/A, and reference material reviewed.
115(sro).	H	3												S	Q=K/A and reference material reviewed.
116(sro).	H	3												S	Q=K/A and reference material reviewed.
117(sro).	H	3												S	Q=K/A and reference material reviewed.
118(sro).	H	4												E	See attached comments, Q=K/A, and reference material reviewed.
119(sro).	H	3												S	Q=K/A, and reference material reviewed.
120(sro).	F	3											X	U	See attached comments, Q=K/A, and reference material reviewed.

Q#	1. LOK (F/H)	2. LOD (1-5)	3. Psychometric Flaws					4. Job Content Flaws				5. Other		6. U/E/S	7. Explanation
			Stem Focus	Cues	T/F	Cred. Dist.	Partial	Job- Link	Minutia	#/ units	Back- ward	Q# K/A	SRO Only		
121(sro).	H	3												E	See attached comments, Q=K/A, and reference material reviewed.
122(sro).	F	3										X	X	U	See attached comments, Q=K/A, and reference material reviewed.
123(sro).	H	4												S	Q=K/A and reference material reviewed.
124(sro).	H	3												S	Q=K/A and reference material reviewed.
125(sro).	H	4												E	See attached comments, Q=K/A, and reference material reviewed.
126(sro).	H	3												S	Q=K/A and reference material reviewed.

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
2.	<p><u>NRC:</u> Not modified in accordance with NUREG-1021. In order for a question to be considered modified, IAW NUREG-1021, you must:</p> <ul style="list-style-type: none"> • Change at least 1 pertinent condition in the stem; and • Change at least 1 distractor. <p align="center">OR</p> <ul style="list-style-type: none"> • Change the conditions in the stem such that one of the three distractors in the original question becomes the correct answer. <p>In this case, no pertinent condition in the stem was changed nor was a distractor modified.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and will change the designation to BANK.</p>
6.	<p><u>NRC:</u> Answers B, C, and D include an item "5" although no item "5" is included in the stem.</p> <p><u>LICENSEE RESPONSE:</u> This was fixed by the licensee.</p>
7. UNSAT,	<p><u>NRC:</u> Pertinent Stem Information is Incorrect. The stem includes a pertinent condition wherein the AB MCC 1B1 120 V Fire Protection Panel is deenergized. Review of associated reference material indicates that there is no MCC 1B1 120 V Fire Protection Panel.</p> <p><u>LICENSEE RESPONSE:</u> The licensee modified the stem info to address panel AB MCC 1A1 vs. 1B1. Also, the licensee modified the distractors such that they related to "A" train equipment.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
8.	<p><u>NRC:</u> The stem should be modified to read "...Which one of the following <i>combinations</i> of IRM readings will result..."</p> <p><u>LICENSEE RESPONSE:</u> the licensee added "...the following combinations of..."</p>
10.	<p><u>NRC:</u> Explanation states that answer "C" is the correct answer. Answer "D" is actually the correct answer. Since answer "D" was listed in the "ANS" block as the correct answer, this issue is simply an enhancement.</p> <p><u>LICENSEE RESPONSE:</u> The licensee corrected this.</p>
12.	<p><u>NRC:</u> Capitalizing "NOT" in answers "A" and "C" could be a cue. Should also capitalize "IN" so as not to cue the applicants.</p> <p><u>LICENSEE RESPONSE:</u> The licensee corrected this.</p>
13.	<p><u>NRC:</u> Not modified in accordance with NUREG-1021. In order for a question to be considered modified, IAW NUREG-1021, you must:</p> <ul style="list-style-type: none"> • Change at least 1 pertinent condition in the stem; and • Change at least 1 distractor. <p align="center">OR</p> <ul style="list-style-type: none"> • Change the conditions in the stem such that one of the three distractors in the original question becomes the correct answer. <p><u>LICENSEE RESPONSE:</u> The licensee agreed and will change the designation to BANK.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
15.	<p><u>NRC:</u> Should the stem state "valid" indication or "accurate" indication...there may be a difference.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and to be consistent with the basis documents, they modified the stem to read "accurate" indication.</p>
16.	<p><u>NRC:</u> Did the licensee validate that the AGAF reading at 95% power is actually 1.04?</p> <p><u>LICENSEE RESPONSE:</u> No, the licensee had not validated this value. Once validated, they determined that an AGAF reading of 1.04 actually corresponds to 94.5% power. The stem was modified to reflect 94.5% power.</p>
17. UNSAT₂	<p><u>NRC:</u> Implausible Distractors. Distractors "A" and "B" both involve only one emergency diesel automatically starting under the conditions given in the stem (LOCA). Given that no electrical fault is discussed in the stem and given that a LOCA signal normally results in both diesels auto starting, a reasonable operator would not be "distracted" by an answer that had only one diesel auto starting on a LOCA signal.</p> <p><u>LICENSEE RESPONSE:</u> Deleted the "B" train choices so as not to cue the applicants.</p>
29. UNSAT₃	<p><u>NRC:</u> Correct Answer is "A" vs. "C." The stem describes a condition wherein voltage has degraded from 4136V to 4065 V. The question then asks whether this is an immediate or delayed loss of power to the applicable busses. The original correct answer ("C") stated that this is a delayed loss. In fact, although the feed breaker trips open in a delayed fashion, the stem described an immediate loss of power making answer "A" correct.</p> <p><u>LICENSEE RESPONSE:</u> Modified the stem to test applicant's knowledge of the impact on breaker response.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
<p align="center">31.</p> <p align="center">UNSAT₄</p>	<p><u>NRC:</u> No Correct Answer provided. Is the correct answer "always" correct under the given conditions?</p> <p><u>LICENSEE RESPONSE:</u> No, the answer was not correct under all possible plant conditions. The stem was modified to indicate a condenser vacuum of 24 inches Hg.</p>
<p align="center">35.</p> <p align="center">UNSAT₅</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 290002K1.17 involves reactor vessel internals/physical connections/ADS. Although the question tests the applicant's knowledge of SRV function, it is independent of the concept of the automatic depressurization system.</p> <p><u>LICENSEE RESPONSE:</u> The licensee significantly modified the question but it still did not meet the requirements of NUREG-1021. Final replacement question meet the requirements of the Standard.</p>
<p align="center">40.</p>	<p><u>NRC:</u> The question tests the applicant's knowledge of when the Rod Pattern Controller enforces a prescribed rod pattern. The original correct answer states that rod patterns are enforced up to 16.7% power. However, the referenced Technical Specification Basis states that it is enforced up to 20%.</p> <p><u>LICENSEE RESPONSE:</u> Updated the listed reference to the latest revision which supports the originally correct answer.</p>
<p align="center">49.</p>	<p><u>NRC:</u> Since related indication only goes to 6 psig, tell the applicant that the gage is "pegged high."</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
<p align="center">52.</p> <p align="center">UNSAT₆</p>	<p><u>NRC:</u> No Correct Answer Provided. The question asks for the "lowest level of the Emergency Plan that would require entry into EOP-9." The entry condition for entry into EOP-9 involves either <u>a liquid or gaseous release</u> above some value NOT simply declaration of an Emergency Plan entry.</p> <p><u>LICENSEE RESPONSE:</u> The stem was modified to be consistent with the EOP verbiage.</p>
<p align="center">53.</p> <p align="center">UNSAT₇</p>	<p><u>NRC:</u> Not Considered an RO Task. The question tests an applicant's knowledge of the basis of a portion EOP-6. The basis, in this case, is not considered general RO system knowledge or considered by the licensee to be a site-specific RO knowledge requirement. Should use to replace question 103, 114, 120, or 122.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified such that it tests at the appropriate level based on review of the Station's training objectives.</p>
<p align="center">54.</p> <p align="center">UNSAT₈</p>	<p><u>NRC:</u> Implausible Distractors. Distractors "A" and "B" both involve the automatic insertion of nuclear instrumentation. This system has no automatic insertion capability. Therefore, a reasonable operator would not be "distracted" by an answer that proposed the system would respond by automatic insertion.</p> <p><u>LICENSEE RESPONSE:</u> Deleted the term "automatic" from the question.</p>
<p align="center">58.</p> <p align="center">UNSAT₉</p>	<p><u>NRC:</u> Multiple Correct Answers. Aren't distractors "B" and "D" also correct under the given conditions?</p> <p><u>LICENSEE RESPONSE:</u> Added the fact that the recirc pump was isolated and drained to preclude "B" and "D" from being correct.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
<p align="center">59.</p>	<p><u>NRC:</u> The question tests the applicant's knowledge of ARP 5140.17 but asks for actions required by CPS 4979.07.</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>
<p align="center">63.</p> <p align="center">UNSAT₁₀</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 295026EK1.01 involves EOPs/high suppression pool temperature/pump NPSH. Although the question tests the applicant's knowledge of NPSH, it does not relate to the licensee's EOPs or a condition where EOPs would apply.</p> <p><u>LICENSEE RESPONSE:</u> The licensee modified the question to require the applicant to evaluate an EOP condition.</p>
<p align="center">85.</p> <p align="center">UNSAT₁₁</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 209002A2.10 involves HPSCS/impact of valve opening/use procedures to mitigate or correct. The question does not test the applicant's knowledge of HPSCS or the impact on HPSCS.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a new question that met the requirements of the Statndard.</p>
<p align="center">86.</p> <p align="center">UNSAT₁₂</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 215005A4.09 involves APRM/monitor in the control room/verify proper function or operability. The question does not test the applicant's ability to determine if the APRMs are functioning properly or are if they are operable under the given conditions.</p> <p><u>LICENSEE RESPONSE:</u> The stem was modified to require the applicant tot determine if the effected monitor will trip or not trip.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
93.	<p><u>NRC:</u> Shouldn't the stem specify that the individual is acting as the "second verifier?"</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>
94.	<p><u>NRC:</u> The original question was not provided; therefore, cannot determine if the question should be designated as "modified" or "bank."</p> <p><u>LICENSEE RESPONSE:</u> Based on a review of the question used to develop this question, it can remain a "modified" question.</p>
95. UNSAT₁₃	<p><u>NRC:</u> Multiple Correct Answers. The reference material provided indicates that either a <i>filtered</i> or <i>unfiltered</i> purge of containment can be performed. As a result, both answers "C" or "D" are correct.</p> <p><u>LICENSEE RESPONSE:</u> Modified the stem to place the plant in a condition requiring a <i>filtered</i> purge.</p>
99. UNSAT₁₄	<p><u>NRC:</u> No Correct Answer provided. The question asks for the "minimum" drywell temperature which requires entry into EOP-6. According to EOP-6, the "minimum" drywell temperature for entry is 150°F. The proposed correct answer is 151°F.</p> <p><u>LICENSEE RESPONSE:</u> The error was corrected.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
<p align="center">101.</p> <p align="center">UNSAT₁₅</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A and not considered to be written at the "SRO ONLY" level. The referenced K/A, 209001G2.1.31 involves LPCS/conduct of ops/entry conditions into Tech Specs. Although the question partially test the applicant's knowledge of Tech Spec entry, it goes on to test the applicant's knowledge of ECCS design criteria which falls well outside the referenced K/A. Also, knowledge of Tech Spec entry conditions is considered RO and SRO general knowledge; therefore, this would not be considered an "SRO Only" question.</p> <p><u>LICENSEE RESPONSE:</u> The question was significantly modified and now meets the requirements of NUREG-1021.</p>
<p align="center">103.</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to be an "SRO Only" question meeting the requirements of NUREG-1021.</p>
<p align="center">105.</p> <p align="center">UNSAT₁₆</p>	<p><u>NRC:</u> No Correct Answer provided. The stem needs to reflect a plant condition under which 1RIX-PR032 is in service.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to address the comment.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
<p align="center">113. UNSAT₁₇</p>	<p><u>NRC:</u> Correct Answer Cued by Question 59. The correct answer to this question provided by the information in the stem of question 59.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p align="center">114. UNSAT₁₈</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p align="center">118.</p>	<p><u>NRC:</u> Upon review of the proposed question, the randomly selected K/A and the need to write the question at the SRO level, it was agreed that the K/A would not support the development of a discriminating question. This K/A will be added to the list on form ES401-10, a new K/A will be randomly selected, and a new question developed. Needs to be written at the "HIGH" level.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p align="center">120. UNSAT₁₉</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs. Question is also a "memory level" question. Replacement needs to be a "HIGH" level question.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
121.	<p><u>NRC:</u> Modify the stem to be consistent with tech Spec basis 3.1.5.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to address the comment.</p>
122. UNSAT₂₀	<p><u>NRC:</u> Question Does Not Match the Referenced K/A and is not considered to be "SRO ONLY." The referenced K/A, 295027G2.4.11 involves EOPs/high primary containment temperature/E-plan/abnormal condition procedures. The question tests the applicant's knowledge of secondary containment conditions. Also, the question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
125.	<p><u>NRC:</u> Provide a copy of CPS ODCM Figure 2.1-1 to the applicants during the written exam.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
2.	<p><u>NRC:</u> Not modified in accordance with NUREG-1021. In order for a question to be considered modified, IAW NUREG-1021, you must:</p> <ul style="list-style-type: none"> • Change at least 1 pertinent condition in the stem; and • Change at least 1 distractor. <p align="center">OR</p> <ul style="list-style-type: none"> • Change the conditions in the stem such that one of the three distractors in the original question becomes the correct answer. <p>In this case, no pertinent condition in the stem was changed nor was a distractor modified.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and will change the designation to BANK.</p>
6.	<p><u>NRC:</u> Answers B, C, and D include an item "5" although no item "5" is included in the stem.</p> <p><u>LICENSEE RESPONSE:</u> This was fixed by the licensee.</p>
7. UNSAT₁	<p><u>NRC:</u> Pertinent Stem Information is Incorrect. The stem includes a pertinent condition wherein the AB MCC 1B1 120 V Fire Protection Panel is deenergized. Review of associated reference material indicates that there is no MCC 1B1 120 V Fire Protection Panel.</p> <p><u>LICENSEE RESPONSE:</u> The licensee modified the stem info to address panel AB MCC 1A1 vs. 1B1. Also, the licensee modified the distractors such that they related to "A" train equipment.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
8.	<p><u>NRC:</u> The stem should be modified to read "...Which one of the following <i>combinations</i> of IRM readings will result..."</p> <p><u>LICENSEE RESPONSE:</u> the licensee added "...the following combinations of..."</p>
10.	<p><u>NRC:</u> Explanation states that answer "C" is the correct answer. Answer "D" is actually the correct answer. Since answer "D" was listed in the "ANS" block as the correct answer, this issue is simply an enhancement.</p> <p><u>LICENSEE RESPONSE:</u> The licensee corrected this.</p>
12.	<p><u>NRC:</u> Capitalizing "NOT" in answers "A" and "C" could be a cue. Should also capitalize "IN" so as not to cue the applicants.</p> <p><u>LICENSEE RESPONSE:</u> The licensee corrected this.</p>
13.	<p><u>NRC:</u> Not modified in accordance with NUREG-1021. In order for a question to be considered modified, IAW NUREG-1021, you must:</p> <ul style="list-style-type: none"> • Change at least 1 pertinent condition in the stem; and • Change at least 1 distractor. <p align="center">OR</p> <ul style="list-style-type: none"> • Change the conditions in the stem such that one of the three distractors in the original question becomes the correct answer. <p><u>LICENSEE RESPONSE:</u> The licensee agreed and will change the designation to BANK.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
15.	<p><u>NRC:</u> Should the stem state "valid" indication or "accurate" indication...there may be a difference.</p> <p><u>LICENSEE RESPONSE:</u> The licensee agreed and to be consistent with the basis documents, they modified the stem to read "accurate" indication.</p>
16.	<p><u>NRC:</u> Did the licensee validate that the AGAF reading at 95% power is actually 1.04?</p> <p><u>LICENSEE RESPONSE:</u> No, the licensee had not validated this value. Once validated, they determined that an AGAF reading of 1.04 actually corresponds to 94.5% power. The stem was modified to reflect 94.5% power.</p>
17. UNSAT₂	<p><u>NRC:</u> Implausible Distractors. Distractors "A" and "B" both involve only one emergency diesel automatically starting under the conditions given in the stem (LOCA). Given that no electrical fault is discussed in the stem and given that a LOCA signal normally results in both diesels auto starting, a reasonable operator would not be "distracted" by an answer that had only one diesel auto starting on a LOCA signal.</p> <p><u>LICENSEE RESPONSE:</u> Deleted the "B" train choices so as not to cue the applicants.</p>
29. UNSAT₃	<p><u>NRC:</u> Correct Answer is "A" vs. "C." The stem describes a condition wherein voltage has degraded from 4136V to 4065 V. The question then asks whether this is an immediate or delayed loss of power to the applicable busses. The original correct answer ("C") stated that this is a delayed loss. In fact, although the feed breaker trips open in a delayed fashion, the stem described an immediate loss of power making answer "A" correct.</p> <p><u>LICENSEE RESPONSE:</u> Modified the stem to test applicant's knowledge of the impact on breaker response.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
<p>31.</p> <p>UNSAT₄</p>	<p><u>NRC:</u> No Correct Answer provided. Is the correct answer "always" correct under the given conditions?</p> <p><u>LICENSEE RESPONSE:</u> No, the answer was not correct under all possible plant conditions. The stem was modified to indicate a condenser vacuum of 24 inches Hg.</p>
<p>35.</p> <p>UNSAT₅</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 290002K1.17 involves reactor vessel internals/physical connections/ADS. Although the question tests the applicant's knowledge of SRV function, it is independent of the concept of the automatic depressurization system.</p> <p><u>LICENSEE RESPONSE:</u> The licensee significantly modified the question but it still did not meet the requirements of NUREG-1021. Final replacement question meet the requirements of the Standard.</p>
<p>40.</p>	<p><u>NRC:</u> The question tests the applicant's knowledge of when the Rod Pattern Controller enforces a prescribed rod pattern. The original correct answer states that rod patterns are enforced up to 16.7% power. However, the referenced Technical Specification Basis states that it is enforced up to 20%.</p> <p><u>LICENSEE RESPONSE:</u> Updated the listed reference to the latest revision which supports the originally correct answer.</p>
<p>49.</p>	<p><u>NRC:</u> Since related indication only goes to 6 psig, tell the applicant that the gage is "pegged high."</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
<p>52.</p> <p>UNSAT₆</p>	<p><u>NRC:</u> No Correct Answer Provided. The question asks for the "lowest level of the Emergency Plan that would require entry into EOP-9." The entry condition for entry into EOP-9 involves either <u>a liquid or gaseous release</u> above some value NOT simply declaration of an Emergency Plan entry.</p> <p><u>LICENSEE RESPONSE:</u> The stem was modified to be consistent with the EOP verbiage.</p>
<p>53.</p> <p>UNSAT₇</p>	<p><u>NRC:</u> Not Considered an RO Task. The question tests an applicant's knowledge of the basis of a portion EOP-6. The basis, in this case, is not considered general RO system knowledge or considered by the licensee to be a site-specific RO knowledge requirement. Should use to replace question 103, 114, 120, or 122.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified such that it tests at the appropriate level based on review of the Station's training objectives.</p>
<p>54.</p> <p>UNSAT₈</p>	<p><u>NRC:</u> Implausible Distractors. Distractors "A" and "B" both involve the automatic insertion of nuclear instrumentation. This system has no automatic insertion capability. Therefore, a reasonable operator would not be "distracted" by an answer that proposed the system would respond by automatic insertion.</p> <p><u>LICENSEE RESPONSE:</u> Deleted the term "automatic" from the question.</p>
<p>58.</p> <p>UNSAT₉</p>	<p><u>NRC:</u> Multiple Correct Answers. Aren't distractors "B" and "D" also correct under the given conditions?</p> <p><u>LICENSEE RESPONSE:</u> Added the fact that the recirc pump was isolated and drained to preclude "B" and "D" from being correct.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
59.	<p><u>NRC:</u> The question tests the applicant's knowledge of ARP 5140.17 but asks for actions required by CPS 4979.07.</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>
63. UNSAT₁₀	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 295026EK1.01 involves EOPs/high suppression pool temperature/pump NPSH. Although the question tests the applicant's knowledge of NPSH, it does not relate to the licensee's EOPs or a condition where EOPs would apply.</p> <p><u>LICENSEE RESPONSE:</u> The licensee modified the question to require the applicant to evaluate an EOP condition.</p>
85. UNSAT₁₁	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 209002A2.10 involves HPCS/impact of valve opening/use procedures to mitigate or correct. The question does not test the applicant's knowledge of HPCS or the impact on HPCS.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a new question that met the requirements of the Statndard.</p>
86. UNSAT₁₂	<p><u>NRC:</u> Question Does Not Match the Referenced K/A. The referenced K/A, 215005A4.09 involves APRM/monitor in the control room/verify proper function or operability. The question does not test the applicant's ability to determine if the APRMs are functioning properly or are if they are operable under the given conditions.</p> <p><u>LICENSEE RESPONSE:</u> The stem was modified to require the applicant tot determine if the effected monitor will trip or not trip.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
93.	<p><u>NRC:</u> Shouldn't the stem specify that the individual is acting as the "second verifier?"</p> <p><u>LICENSEE RESPONSE:</u> This was corrected.</p>
94.	<p><u>NRC:</u> The original question was not provided; therefore, cannot determine if the question should be designated as "modified" or "bank."</p> <p><u>LICENSEE RESPONSE:</u> Based on a review of the question used to develop this question, it can remain a "modified" question.</p>
95. UNSAT₁₃	<p><u>NRC:</u> Multiple Correct Answers. The reference material provided indicates that either a <i>filtered</i> or <i>unfiltered</i> purge of containment can be performed. As a result, both answers "C" or "D" are correct.</p> <p><u>LICENSEE RESPONSE:</u> Modified the stem to place the plant in a condition requiring a <i>filtered</i> purge.</p>
99. UNSAT₁₄	<p><u>NRC:</u> No Correct Answer provided. The question asks for the "minimum" drywell temperature which requires entry into EOP-6. According to EOP-6, the "minimum" drywell temperature for entry is 150°F. The proposed correct answer is 151°F.</p> <p><u>LICENSEE RESPONSE:</u> The error was corrected.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
<p align="center">101.</p> <p align="center">UNSAT₁₅</p>	<p><u>NRC:</u> Question Does Not Match the Referenced K/A and not considered to be written at the "SRO ONLY" level. The referenced K/A, 209001G2.1.31 involves LPCS/conduct of ops/entry conditions into Tech Specs. Although the question partially test the applicant's knowledge of Tech Spec entry, it goes on to test the applicant's knowledge of ECCS design criteria which falls well outside the referenced K/A. Also, knowledge of Tech Spec entry conditions is considered RO and SRO general knowledge; therefore, this would not be considered an "SRO Only" question.</p> <p><u>LICENSEE RESPONSE:</u> The question was significantly modified and now meets the requirements of NUREG-1021.</p>
<p align="center">103.</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to be an "SRO Only" question meeting the requirements of NUREG-1021.</p>
<p align="center">105.</p> <p align="center">UNSAT₁₆</p>	<p><u>NRC:</u> No Correct Answer provided. The stem needs to reflect a plant condition under which 1RIX-PR032 is in service.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to address the comment.</p>

Comments on CLINTON Written Exam Material

Question Number	Comment(s)
<p>113.</p> <p>UNSAT₁₇</p>	<p><u>NRC:</u> Correct Answer Cued by Question 59. The correct answer to this question provided by the information in the stem of question 59.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p>114.</p> <p>UNSAT₁₈</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p>118.</p>	<p><u>NRC:</u> Upon review of the proposed question, the randomly selected K/A and the need to write the question at the SRO level, it was agreed that the K/A would not support the development of a discriminating question. This K/A will be added to the list on form ES401-10, a new K/A will be randomly selected, and a new question developed. Needs to be written at the "HIGH" level.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
<p>120.</p> <p>UNSAT₁₉</p>	<p><u>NRC:</u> The Question is not considered to be "SRO ONLY." The question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs. Question is also a "memory level" question. Replacement needs to be a "HIGH" level question.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>

Comments on **CLINTON** Written Exam Material

Question Number	Comment(s)
121.	<p><u>NRC:</u> Modify the stem to be consistent with tech Spec basis 3.1.5.</p> <p><u>LICENSEE RESPONSE:</u> The question was modified to address the comment.</p>
122. UNSAT₂₀	<p><u>NRC:</u> Question Does Not Match the Referenced K/A and is not considered to be "SRO ONLY." The referenced K/A, 295027G2.4.11 involves EOPs/high primary containment temperature/E-plan/abnormal condition procedures. The question tests the applicant's knowledge of secondary containment conditions. Also, the question tests the applicant's knowledge of annunciator response procedure entry conditions and immediate actions. This is considered general knowledge for both ROs and SROs.</p> <p><u>LICENSEE RESPONSE:</u> The question was replaced with a question meeting the requirements of NUREG-1021.</p>
125.	<p><u>NRC:</u> Provide a copy of CPS ODCM Figure 2.1-1 to the applicants during the written exam.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
<p>A.1.a.1(ro) (pmt of sx pump)</p> <p>UNSAT₁</p>	<p><u>NRC:</u> This JPM is not discriminating and would also be considered an "Equipment Control" JPM vs. an "Conduct of Operations" JPM. Additionally, no "administrative" task is associated with this JPM; therefore it is technically a pre-scripted question.</p> <p><u>LICENSEE RESPONSE:</u> This JPM was replaced with a JPM requiring the applicant to determine if a mode change had occurred based on a review of temperature logs. The replacement met NUREG-1021 requirements.</p>
<p>A.1.b.1(ro) (mcr walkdown)</p>	<p><u>NRC:</u> Should ensure that indicated drywell pressure would constitute a TS entry condition.</p> <p><u>LICENSEE RESPONSE:</u> This error was not necessary and was deleted from the JPM.</p>
<p>A.2.1(ro) (remove ann. from service)</p>	<p><u>NRC:</u> During validation, ensure annunciator window indicates which panel to go to in order to pull the correct cards.</p> <p><u>LICENSEE RESPONSE:</u> Annunciator window provided necessary information for successfully completing the JPM.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
<p>A.1.a.1(sro) (activate ero)</p> <p>UNSAT₂</p>	<p><u>NRC:</u> This JPM does not match the referenced K/A, in that, it does not require the applicant to demonstrate knowledge of "system status criteria requiring notification of personnel." Also, the JPM would be considered an "Emergency Plan" JPM NOT an "Conduct of Operations" JPM.</p> <p><u>LICENSEE RESPONSE:</u> Modified the JPM to require the applicant to determine the need to notify on-site personnel (non-E-plan).</p>
<p>A.1.b.1(sro) (review vlu)</p>	<p><u>NRC:</u> Identification of the missing initials for valve 1C41-F323 and noting that "Note 1" states that valve 1C41-F031 is OPEN should be critical steps. Identifying the missing signature should be <i>expected</i> but not critical.</p> <p><u>LICENSEE RESPONSE:</u> The JPM was modified to address the comment.</p>
<p>A.3.1(sro) (prevent moving rad boundary)</p> <p>UNSAT₃</p>	<p><u>NRC:</u> This JPM requires the applicant to have memorized radiological conditions in the plant. This is not reasonable. Also, the situation created in the initial conditions do not reflect the manner in which the facility normally handle the movement of a radiological boundary (per station RP procedures).</p> <p><u>LICENSEE RESPONSE:</u> The licensee replaced the JPM with two open-reference questions. The replacement material met the requirements of NUREG-1021.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
B.1.a.1 (slc initiation w/o rwc isolation)	<p><u>NRC:</u> Label the point in the JPM where the alternate path begins.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
B.1.c.1 (defeat rod pattern controller)	<p><u>NRC:</u> The JPM does not match the referenced K/A.</p> <p><u>LICENSEE RESPONSE:</u> K/A changed to match the task.</p>
B.1.d.1 (purge cti rm with vc system)	<p><u>NRC:</u> The JPM does not match the referenced K/A.</p> <p><u>LICENSEE RESPONSE:</u> K/A changed to match the task.</p>
B.1.f.1 (manual initiation of ads)	<p><u>NRC:</u> Label the point in the JPM where the alternate path begins.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
B.1.g.1 (load edg)	<p><u>NRC:</u> Label the point in the JPM where the alternate path begins.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
B.2.a.1 (supp. pool cooling from rsp)	<p><u>NRC:</u> Label the point in the JPM where the alternate path begins.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
B.2.b.1 (low hydro pressure on hpu)	<p><u>NRC:</u> Cue the applicant and provide 3105.04 from the start.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
A.3.2(ro) (entry into lhra)	<p><u>NRC:</u> Modify to match station procedural requirements for entry into a locked high radiation area:</p> <ul style="list-style-type: none"> • Locate RWCU room; • Review postings; • Review survey map; • Select RWP; • request RP briefing; • request RP key; and • Determine TLD requirements. <p><u>LICENSEE RESPONSE:</u> Licensee decided it was easier to replace the JPM. The replacement JPM met the requirements of NUREG-1021.</p>
A.4.2(ro)	<p><u>NRC:</u> Add a step requiring the applicant to also sound the evacuation alarm (assembly siren).</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
<p>A.1.a.2(sro)</p> <p>UNSAT₄</p>	<p><u>NRC:</u> Not Sufficiently Discriminating for an SRP Applicant. Add a critical step for the applicant to review ITS and identify appropriate action statement(s).</p> <p><u>LICENSEE RESPONSE:</u> The licensee added the additional critical steps.</p>
<p>A.2.2(sro)</p>	<p><u>NRC:</u> The corrected calculation of leakage should actually be $\frac{54,672-51,043}{1440} = 2.52$</p> <p><u>LICENSEE RESPONSE:</u> The calculation was corrected.</p>
<p>B.1.e.2 (bypass lprm)</p>	<p><u>NRC:</u> Provide a 3-D monicore to the applicant.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
<p>B.2.b.2 (rcic start from rsp)</p>	<p><u>NRC:</u> Should start at step 4.1 to allow applicant to demonstrate system understanding as it relates to RCIC operation from the RSP.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
B.2.c.2 (ws/fp crosstie)	<p><u>NRC:</u> With no indication available to operator in the field, do we get sufficient evaluation of the applicant using this JPM?</p> <p><u>LICENSEE RESPONSE:</u> The JPM was modified to ensure actions taken demonstrate the applicant's understanding of the system.</p>
A.1.a.3(ro) (This JPM was not used on the exam. Also, the JPM was not made publically available at the request of the licensee)	<p><u>NRC:</u> REDACTED</p> <p><u>LICENSEE RESPONSE:</u> REDACTED</p> <p><u>NRC:</u> REDACTED</p> <p><u>LICENSEE RESPONSE:</u> REDACTED</p>
A.1.b.3(ro) UNSAT, (This JPM was not used on the exam. Also, the JPM was not made publically available at the request of the licensee)	<p><u>NRC:</u> REDACTED</p> <p><u>LICENSEE RESPONSE:</u> REDACTED</p>
A.3.3(ro) (This JPM was not used on the exam. Also, the JPM was not made publically available at the request of the licensee)	<p><u>NRC:</u> REDACTED</p> <p><u>LICENSEE RESPONSE:</u> REDACTED</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
<p>A.1.b.3(sro) (mode two checklist)</p>	<p><u>NRC:</u> Delete problem with the SRM. Does not provide any additional evaluation and is similar to other tasks in other JPMs.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p> <p><u>NRC:</u> Breakout critical step into two steps: 1) identify RCIC issue (not crit) and 2) identify RHR issue and evaluate TS/TRM (crit).</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
<p>A.3.3(sro) (secure vacuum pump)</p> <p>UNSAT₆</p>	<p><u>NRC:</u> This is a "system" JPM. It does not involve an "administrative" task.</p> <p><u>LICENSEE RESPONSE:</u> This JPM was replaced with two open-reference questions. The replacement material met the requirements of NUREG-1021.</p>
<p>A.4.3(sro) (determine pars)</p>	<p><u>NRC:</u> Ensure a copy of EOP-8 is available to the applicant.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
<p>B.2.a.3 (open rps breakers)</p> <p>UNSAT₇</p>	<p><u>NRC:</u> The JPM involved the same task as written exam question #45. The licensee chose to remedy the situation by replacing this JPM.</p> <p><u>LICENSEE RESPONSE:</u> The replacement material met the requirements of NUREG-1021.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
<p>B.2.c.3 (operate srvs from rsp)</p> <p>UNSAT₈</p>	<p><u>NRC:</u> The JPM, as written, has no alternate path. The direction is to reduce pressure using SRVs. The procedure has the applicant align the RSP to allow the opening of both Div 1 and Div 2 SRVs and then allows the applicant to open SRVs "as necessary." If on division doesn't function at this point, the applicant simply continues with the procedure as written with no "transition" to evaluate as an alternate path.</p> <p><u>LICENSEE RESPONSE:</u> The JPM was modified such that the applicant was directed to operate a specific train of SRVs and upon their failure would have to energize and operate the opposite train.</p>
<p>Scenario 1</p> <p>General</p>	<p><u>NRC:</u> Should rearranged the order of events.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
<p>Scenario 2</p> <p>General</p> <p>Event 4</p>	<p><u>NRC:</u> Should rearranged the order of events.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p> <p><u>NRC:</u> Startup of aux. steam is not a discriminating event for the BOP operator.</p> <p><u>LICENSEE RESPONSE:</u> Replaced event with shifting of drywell cooling system.</p>

COMMENTS ON CLINTON OPERATING EXAM

JPM/Scenario Event Number	Comment(s)
Scenario 3	
General	<p><u>NRC:</u> Should rearranged the order of events.</p> <p><u>LICENSEE RESPONSE:</u> Done.</p>
Event 5	<p><u>NRC:</u> Should consider replacing the event due to the similarity in actions with Event 3.</p> <p><u>LICENSEE RESPONSE:</u> Swapped Event 5 with Event 4 from Scenario 5.</p>
Event 6	<p><u>NRC:</u> A CB pump water leak is not a discriminating event for the RO.</p> <p><u>LICENSEE RESPONSE:</u> Swapped Event 5 with Event 4 from Scenario 5.</p>
Scenario 4	
General	<p><u>NRC:</u> Should add another reactivity manipulation just in case the planned events do not go as planned.</p> <p><u>LICENSEE RESPONSE:</u> Added a power increase using recirc pumps.</p>
Scenario 5	
Event 4	<p><u>NRC:</u> Swapped the event with Event 5 from Scenario 3 (see Scenario 3 comments for details).</p> <p><u>LICENSEE RESPONSE:</u> N/A</p>
Event 5	<p><u>NRC:</u> This event was not discriminating for the RO applicant.</p> <p><u>LICENSEE RESPONSE:</u> Replaced the event with an inadvertent start of the 1C RFP.</p>