NRC Comments on DRAFT OPERATING TEST

Scenarios must describe all <u>required</u> operator actions. Referring to procedures is not adequate. (ES 301 D.5.f) Required operator actions missing in the following scenarios:

Scenario #1

Select/withdraw all 8 IRM's per OP-16E.9
Start second condensate pump per OP-3D.7
May adjust (CRD drive pressure) up to 400 psid per OP-25 Section E

Scenario #2

Power ascent with recirc. Flow
Perform actions of AOP-41/42
OP-2A Section G.3 and G.7 actions
Select and fully insert all rods in the 1st cram group

Scenario #3

Start C SW pump and place B in standby per OP-42G.1
Perform AOP-5 actions
Vent torus per OP-37
Shutdown EDG A&C
Place B RHR in drywell spray observing caution for excessive pump amps

Scenario #4

Shutdown per OP-65
Bypass 'B' flow unit per ARP-09-5-2-25 and OP-16E.22
Reset half scram per ARP-09-5-1-4
Shutdown 'B' RFP per OP-2A
Perform AOP-40 actions

The JPMs do not give the <u>performance criteria or specify the task standard </u>as required in ES Appendix C section B.3

JPM-"Conduct Emergency Rod In Functional Test". Add step "2 ½" . Ensure applicant selects the correct rod sequence on selector switch that matches rod withdrawal sheets.

JPM-"Reopen MSIVs with RPV Pressurized". Step 4- add "SVB-1 to valve list

JPM-"SGT Initiation Verification (Alt Path)-Step 7-add note to evaluator that applicant may complete all train "A" actions before looking at train "B". Step 8- evaluator may need to respond as CRS and order "B" train start after applicant's report.

JPM "Jet Pump ST-23C (Alt Path) Steps 7 and 12 use loop B data where applicable for criteria (loop A data used)