

Prairie Island Operating Test Comments

No.	Source	Comment	Resolution
1.	JPM A. VC-12SF-1 Emergency Borate	Minor editorial errors. Does not indicate Alternate Path on Cover sheet. Cue states, "Perform step 4 of FRS.1," when it should be FR-S.1. Step S-1, states ...shift runing BA pump to fast."	Corrected
2.	JPM B. SI-11S Put a Train of Si in Recirculation	<p>Page 4, Step 1&2 should be critical steps.</p> <p>Page 7, Step 3 note that the candidate may refer to the initial conditions instead of asking examiner if the bonnets are vented.</p> <p>Page 8, Step 4 bold the evaluator note and make it a cue instead of a note.</p>	<p>Corrected</p> <p>Corrected</p> <p>Corrected</p>
3.	JPM C. EO-30SF-1 Respond to Stuck Open Pzr Valve.	<p>There are no initial conditions established for the candidate.</p> <p>Edit initial conditions - Should read 1 through 5 instead of 1 through 7</p> <p>Initiating cues to read perform E-0 starting at step 6.</p> <p>Put in terminating cue after E-0 step 8.</p> <p>Add appropriate E-0 steps to JPM.</p>	<p>Initial Conditions included.</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>

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4.	JPM D. EO-21SF-1 RCS Bleed and Feed During Response To Loss of Secondary Heat Sink With A PORV Failing To Open.	Outline states this is an alternate path JPM, the cover sheet does not. No alternate path is required to be taken. The JPM does not say which PORV does not open. I assume it is CV-31231 do to it not being a critical step.	Edited Sat. Incorrect RCS vents are opened which is an alternate path through the RNO column. Edited Sat.
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5.	JPM E. ARS-1 Place Standby Air Ejector In Service	<p>There are no initial conditions established for the candidate.</p> <p>Information in standard is not specific enough, e.g. "Verifies low vacuum using available indication." What's available?</p> <p>The third performance step, standard steps b and c have confused the condenser vacuum breakers. The procedure says, "verify proper circulating water flow for the power level," the standard states, " verify the circulating water pumps running." There's a difference.</p> <p>The third performance step states, "verify condenser crossover valve MV-32005 is open." The procedure says to do this only if a CW pump is lost. Has a pump been lost?</p> <p>The fourth performance step has the candidate place the air ejector in service. This is not indicated as a critical step even though the JPM title is "Place Standby Air Ejector In Service." The procedure has the operator place exhaust hood sprays and condenser spray system in service the JPM does not.</p> <p>The only critical step in the JPM is to Trip the reactor. What if the candidate is so slow that the reactor is required to be tripped before the air ejector is placed in service?</p> <p>Page 8, Step 2, is not a critical step</p> <p>Page 8, Step 3, is a critical step</p> <p>Page 8, Step 3, standard shall discuss failure criteria at 3.5 inches Hg</p>	<p>Edited Sat.</p> <p>Edited Sat.</p> <p>Edited Sat.</p> <p>Edited Sat.</p> <p>Edited Sat.</p> <p>Putting air ejector in service is now a critical step.</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>
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6.	JPM F EO-29SF-1 Response to Containment Isolation Failure to Actuate	The JPM had CV-31326 fail to close and the operator was to take manual action. There was no procedural direction for the operator to manually close CV-31326 upon the failure to close. Changed the JPM to have CV-31339 fail to close for which there is procedural guidance to manually close the valve.	Corrected
7.	JPM G PS-6S Respond to A PZR Level Channel Failing High.	<p>There are no initial conditions or initiating cues established for the candidate.</p> <p>The licensee included initial conditions but will edit to just discuss the noun name of the annunciator.</p> <p>JPM must be edited to include Alarm response procedure (ARP) C47012-0507 steps.</p> <p>Page 5, Step 1, edit to read charging flow is “raised” until total flow is “greater” than letdown.</p> <p>Page 5, Step 3 should read TS 3.3.1 Condition A</p>	<p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>

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8.	JPM H RC-15S High RCS Activity	<p>Performance step? On page 5 says adjust seal injection flow to 8gpm and the procedure 1C12.1 5.7.4 B. says 9.5 gpm?</p> <p>Ensure initial simulator set up has RM read greater than 10 R/hr</p> <p>Initial conditions should have 2 CCP's running</p> <p>Change Initiating Cues to read, "You are the lead respond to any alarms that may come in.</p> <p>Page 4, Step 1, edit to show that annunciator 47077:0108 is the initiating event.</p> <p>Page 5, add note that C12.1AOP4 will be looked @ by another operator.</p>	<p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>
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9.	JPM I Immediate Actions for control room evacuation	<p>Instead of stopping the JPM where you suggested just make the cues state that the 22DCLP is running and that the pressure at PI-11082 is greater than 90 psig. This will shorten the JPM and allow for completion of the procedure. Why are there more than one JPM included here?</p> <p>Page 4, Step 1 need cue for turbine verification</p> <p>Page 5, Step 2, add that the knife switch is inside cabinet #-----</p> <p>Page 6, Step 1, put 1190 rpm instead of full speed</p> <p>Page 7, Step 2, use 1190 rpm instead of running</p> <p>Page 8, Step 1, note to examiner that valve has no epn tag</p>	<p>The licensee included more than one JPM to make the exam easier to administer. The examiner disagreed with this plan and only one JPM was selected (F5-9 Unit 1 Reactor Operator Actions when evacuating the Control Room).</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>
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10.	JPM J EG-11F Local Start of DG	<p>Editorial, third performance step on page 6 should include the epn's of equipment used to control voltage and frequency.</p> <p>Editorial, first performance step on page 7, what is it the candidate is looking for?</p> <p>How will he/she know if the parameters are normal if the examiner is not there to tell them?</p> <p>Page 5, Step 3, need a note to tell examiner how the valve is to unlocked and opened.</p> <p>Page 6, Step 2, add cues for field and output voltage. Move cue for voltage and frequency from next step.</p> <p>Page 6, Step 3, make adjusting voltage and frequency 2 separate steps</p>	<p>Corrected</p> <p>Edited Sat.</p> <p>Edited Sat.</p> <p>Corrected</p> <p>Corrected</p> <p>Corrected</p>
11.	<p>JPM K MS-4 Locally open 12 S/G PORV</p> <p>REPLACED</p> <p>VC-16 Borate the RCS From Outside The Control Room</p>	<p>Very simple one step procedure. Only manipulated one valve.</p> <p>No comments.</p>	<p>Licensee replaced this JPM because it was too simple. The licensee replaced this with another JPM, however, during validation it was determined that one of the valves needed to perform the JPM was within a contaminated area due to an event that recently occurred. With 17 prospective candidates this would be too difficult to administer so the licensee replaced the JPM again. The new JPM was sat as provided.</p>
12.	SRO Admin Determine Max RCS Venting Time	Editorial, equations in JPM are not the same as those in procedure.	Edited JPM SAT. Minor editorial change required. Corrected.

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13.	<p>RO Admin Remove An Annunciator from Service</p> <p>REPLACED</p> <p>Prepare a Temporary Procedure Change</p>	<p>Must this be done in the CR? Will add significant time to the day. There are several examiner cues in the JPM which are not indicated as such. Several performance steps refer to procedure step 5.2.2.B when it should read 5.2.2.C.</p> <p>Procedure step 5.2.2.C.3 states, "Momentarily place the keyswitch in the 'Enable/Disable' position". What does momentarily mean?</p> <p>What are the additional compensatory actions required for removing this annunciator from service discussed in C47 step 3.3.5? Why aren't they required to be identified as part of this JPM?</p>	<p>This JPM was removed because it required a portion to be performed in the control room. For ease of exam administration the licensee replaced it with a JPM that removed a radiation monitor from service. However, the examiners identified that this activity was part of a simulator set. The JPM was replaced again with a new JPM to perform a temporary procedure change. The new TPC JPM was Sat as provided.</p>
14.	<p>SRO Admin Reclassify Event and Issue PAGs</p>	<p>Would like to see a completed PINGP 577 as an answer key and the previously completed PINGP 577 as part of the initial conditions.</p>	<p>PINGP 577 provided as answer key. Answer key needed to be changed because the licensee identified that initial condition could result in two possible correct answers. Corrected.</p>
15.	<p>SRO Admin Surveillance Test Review</p>	<p>The JPM needs to be clarified on page 4 that the candidate shall identify that stroke time was not performed in August in steps 6.1, 7.8, 7.9 of SP1111A to be SAT.</p>	<p>Corrected.</p>
16.	<p>SRO Admin Authorize Rad waste release</p>	<p>Form provided with JPM was Met data, the procedure requires an OPWIND display.</p> <p>Initials on step 7.3.8 of C21.3-10.12 provided to the candidate need to be changed so that they are acceptable.</p>	<p>Corrected.</p> <p>Corrected.</p>

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17.	SRO Admin obtain a current copy of an SP	Need more detail added to the JPM so that the examiner can follow the candidates actions.	Changed to include the wrong revision of a procedure to determine if the candidate knows how to use the system. Corrected.
18.	RO Admin Prep for Emergency Survey	Minor editorial changes necessary.	JPM was changed to include a choice of meters from which the candidate needed to choose, and the beta window was to be closed to determine if the candidate knew how to perform a source check. Corrected
19.	RO Admin Prep reactivity Plan REPLACED Perform NIS Checks	Drop the word "dilution" from cue and put "boron concentration change" Editorial = should be + An answer key needs to be provided. Standard for what is an acceptable value needs to agree with procedure provided. (Page 6, Step 3) Need note for examiner as to what ERCS value should be on Page 6, Step 1 Need note that tells examiner that Channel N43 needs adjusting on Page 6, Step 2.	This JPM was dropped because the licensee had no procedural actions from which a standard of acceptance could be derived. This JPM was replaced with a JPM to perform NIS checks and determine that Channel N43 gains needed to be adjusted. Corrected. Corrected. Corrected. Corrected.

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20.	RO Admin Review Control Room Log	Drop "trainee completed logs" and "identify ALL discrepancies." Candidate should be given a full set of logs.	Corrected. Full set of logs provided.
21.	Scenario A	Event 1, add required charging flow and seal injection flow amounts	Done Sat.
22.	Scenario A	Event 2, "Reactor Vessel O-Ring Leak," is the same as audit exam JPM.	Will change audit exam. Done.
24	Scenario A	Please add definition of adverse containment to note at beginning of scenario.	Will edit. Done page 6.
25.	Scenario A	There are no abnormal events in Scenario A as defined in Appendix D, C.2.d page 9-41.	Changed initial conditions such that when charging pump trips in event 1 the crew should go to 1C12.1 AOP1.
26.	Scenario A	Can only assume that closing the MSIV's isolates the steam leak?	Will edit. Done Sat.
	Scenario A	Add note to have lead called away prior to Event 2 so that RO can perform event 2.	Corrected.
	Scenario A	Need to mark up initial conditions to indicate that the crew is about to swap charging pumps when taking the shift. 11CCP running, 12 unavailable, and 13 in PTL.	Corrected.
	Scenario A	Event 1, include steps of 1C12.1 AOP1 that are applicable.	Corrected.
	Scenario A	Ensure that EPNs in addition to noun names are added to JPM where applicable.	Corrected.
	Scenario A	Event 3, reference procedure C11, Step 5.4 for turning off RM11/12. Reference T/S 3.4.16 B.1.1 & B.2 SR 3.4.14.1	Corrected.

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	Scenario A	Event 4 add trip set points for TDAFW as an evaluator note.	Corrected.
27.	Scenario B	Event 1, what is the TS applicability? Event 2, TS applicability says "if leak is stopped." Will the leak be stopped?	Will edit. Done Sat. Scenario did not include action to delete malfunction. Therefore no TS applicability.
28.	Scenario B	Why not put S/G tube leak then rupture before loss of all AC. This gives another abnormal event.	Will review for edit. Not done tube leak was in audit exam.
29.	Scenario B	Scenario does not discuss the requirement to close the ruptured S/G blowdown valves as described in 1E-3 step 3.d.	Valves close automatically.
30.	Scenario B	Why isn't the RCS depressurized using spray valves per step 17 of 1E-3?	RCPs are gone because of the loss of all AC.
31.	Scenario B	Scenario description for Event 7 critical task is too cryptic.	Edit for content. Done Sat.
32	Scenario B	Event 1, Steps from ARP 47011:0405 need to be added.	Corrected.
33	Scenario B	Event 2, add EPN's and/or noun names for valves and switches	Corrected.
34	Scenario B	Event 2, edit to remove system engineer recommendation.	Corrected.
35	Scenario B	Event 2, TS applicability should be TS 3.4.14 and 3.5.1	Corrected.
36	Scenario B	Event 3, add S/G level trip setpoint.	Corrected.
37	Scenario B	Event 3, edit out 2% criteria in critical task. The termination cue should read S/G levels stable or reactor is tripped.	Corrected.
38	Scenario B	Event 4, add steps from ECA 0.0	Corrected.
39	Scenario B	Event 4, change so that both diesels start but don't load on.	Corrected.

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40	Scenario B	Event 5, add isolation of AFW to critical step	Corrected.
41	Scenario B	Event 5, add appropriate steps from E-0	Corrected.
42	Scenario B	A PDP will go away on low VCT level need steps for charging pump recovery added.	Corrected.
43	Scenario B	Event 5 add an evaluator note that a followup question on whether or not the crew recognized a release was in progress when the S/G Porv lifted during the tube rupture.	Corrected.
44	Intentionally blank		
45	A/B Quality check list	<p>Scenarios A and B, don't list symptoms/cues visible to the crew. Scenario A major doesn't show what the indications of the steam line rupture are. Scenario B doesn't have symptoms/cues visible for S/G tube rupture.</p> <p>Events don't have termination criteria.</p> <p>Also, NUREG 1021, Appendix D page 3, states that every required operator action should be on the form ES-D-2. Many procedure actions are not indicated on ES-D-2.</p> <p>Is A or B or Both new scenarios?</p>	<p>Edit. Done Sat.</p> <p>Edit. Done Sat</p> <p>Corrected.</p> <p>All new scenarios.</p>
46	Scenario C	Event 2, "Places excess letdown in service," is not specific enough.	Will edit. Done Sat.
47	Scenario C	Verification of auto rod insertion cannot be a critical task. If the rods auto insert and the operator fails to verify what's the impact on the plant?	Rods will stop during auto insertion manual insertion is critical.
48	Scenario C	Isolates B steam generator is not specific enough. Specifically what valves need to be manipulated.	Will edit. Done Sat.

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49	Scenario C	Event 4, Critical task to start CC pump. Why has CC pump gone away? CC12 has already tripped in previous event. What in attachment L causes the operator to start CC pump?	The CC pump doesn't actually trip. The bus strips and the pump doesn't come back. Step 7 of Attachment L has the operator restart the CC pump.
50	Scenario C	Event 7, is there a TS associated with this event? TS 3.3.1 F1?	TS not applicable.
51	Scenario C	There are no abnormal events in Scenario C as defined in Appendix D, C.2.d page 9-41.	Added RCS leak to implement 1C4 AOP1
52	Scenario C	Event 1, Alarm 47020:0103 need appropriate steps added to JPM	Corrected.
53	Scenario C	Event 2, add note that minimizing charging includes securing a charging pump	Corrected.
54	Scenario C	Event 2, add a reference to AOP for Loss of Letdown	Corrected.
55	Scenario C	Event 3, ARP 47020:0102 references TS 3.7.7 so it is also applicable and should be referenced in the JPM.	Corrected.
56	Scenario C	Event 3, add steps on how RO is to restore PZR heaters.	Corrected.
57	Scenario C	Event 4, RO should recognize entry into TS for DNB below 2200 psig. Need evaluator note.	Corrected.
58	Scenario C	Event 5, add note that RO attempts to scram reactor by operating 2 trip switches and the AMSAC/DSS switch	Corrected.