



### Comments on Fort Calhoun Initial Licensing Exam Operating Section

1. Scenarios 1, 2, 3, and 4 all have similar malfunction with the Steam Generator Level transmitter.

Response: Although malfunctions look similar, actions required are different for the operators. Check during validation week.

2. Standard Post trip actions listed as critical step in some scenarios, but not in others.

Response: Only listed as critical if there were actions necessary rather than just verification of proper response of automatic function.

3. Securing of 1 reactor coolant pump per loop at 1350 psia listed as critical in scenario 1, but not in scenario 2.

Response: Will make it critical.

4. Manual control of FRV marked as critical in scenarios 3, not critical in scenario 1, 2, and 4.

Response: Will check and mark as critical if appropriate.

5. Why is HPSI throttling a critical step in scenario 4, but not in scenario 1?

Response: Should be, will make critical.

6. JPM-0613A: How long does applicant have to start pump before equipment damage/ UNSAT?

Response: Will need to determine.

7. JPM-0613A: How many pump restart attempts are allowed if applicant does not hold start switch in the start position?

Response: One

8. JPM-0613A: JPM seems very simple, without much discriminatory value.

Response: Chosen because of importance, when validated previously, most operators failed. Procedure was modified as a result. Decision to check during validation week.

9. JPM-RO-CO-1: Should applicant be given copy of procedure or do they need to identify it before copy is provided?

Response: Applicant should identify procedure, will add wording to JPM.

10. JPM-RO-CO-2: JPM appears to have very little discriminatory value to determine if applicant is competent.

Response: This is a very critical function. Applicant needs to identify procedure and locate applicable graphs. Decision to check during validation week.

11. JPM-RO-EC-1: Is it necessary for the applicant to identify the specific paths, including pumps and sources, for satisfactory completion of the critical step?

Response: Yes, will add wording to JPM so this is clear.

12. JPM-RO-EC-1: Are references to be directly provided to the applicant at start of JPM or do they need to identify and locate references as part of the task?

Response: Applicant needs to identify and locate reference materials as part of the task.

13. JPM-RO-RC-1: Very simple if being performed as a stand alone JPM, Would have little discriminatory value.

Response: JPM will be completed in conjunction with another JPM requiring RCA entry.

14. JPM-0719M: Initiating cue needs typo corrections

Response: Will make necessary corrections.

15. JPM-0719M: Is applicant given a copy of the procedure at beginning of JPM?

Response: Yes, that is what would be expected when operator is tasked with completion of this task.

16. JPM-0719M: Initiating cue that HC-745 is in HAND appears to be out of step with the procedure.

Response: Will drop from initiating cue, add step in JPM requiring applicant to have HC-745 positioned in HAND and add cue that Control Room reports HC-745 is in HAND.

17. JPM-0719M: Step 4 of Attachment 5B, read and record initial H2 sample connection and H2 concentration, is not in the JPM. Is this the same sample point and concentration listed in Attachment 5A?

Response: Not sure, will add step for applicant to contact control and provide cue as necessary.

18. JPM-0719M: How long of a delay is allowed between completion of step 6a and 6b, caution states step 6b must be completed immediately after step 6a or a radiological release to room 59 and equipment damage will result.

Response: Don't know, will determine and make necessary entries.

19. JPM-0356: Why is it critical to ensure AI-133A switch is in emergency a critical step at one point in JPM, but placing it in emergency earlier in the JPM isn't?

Response: Not sure, will determine and make changes as necessary.

20. JPM-0225: Does applicant need to notify Control room that potable water is aligned before cue is given and flow verified?

Response: Yes, will add step for applicant to inform control.

21. JPM0726: Why is the cue "They are shut and will not open" given to the applicant. Applicant should be given appropriate indication and make necessary determinations as appropriate.

Response: Agree, will change cue to green light lite, and direction from the control room if report made that unable to open valves.

22. JPM-SRO-CO-2: JPM appears to have very little discriminatory value to determine if applicant is competent.

Response: Will look at adding additional requirements to it.

23. JPM-SRO-RC-1: JPM appears to have very little discriminatory value to determine if applicant is competent.

Response: Will look at adding additional requirements to it.

24. JPM-0329: JPM step requires 72%, no margin provided. Is this the requirement?

Response: No, will add a band above 72% but below high level alarm.

25. JPM-0329: Need guidance in case applicant exceeds high pressure limit when filling SIT, not covered by procedure.

Response: We have a separate procedure for adjusting the pressure. Will add note for examiner that if applicant reports SIT pressure limit exceeded, examiner provides cue that another operator will take care of this.

26. JPM-0387: Why are keys being placed in the appropriate swithes for the applicant, the Procedure states obtain necessary keys.

Response: Will change JPM. Applicant will obtain keys and have to locate the appropriate switches to operate.

27. JPM-0387: Typo in step 24

Response: Will correct

28. JPM-0387: Need to add note to examiner not to give cue at JPMstep 39 until after applicant states requirement of Procedure step 11.

Response: Will add note.

29. JPM-0778: Why isn't technical specification recognition and log entry a critical step?

Response: Will mark as critical for operator to notify Control room of entry into the TS and request log entry.

30. JPM-0627: Have concern that applicant may focus on issue of failed pressure control system and not complete assigned task.

Response: Will add note to examiner to inform applicant that another operator will take necessary actions to address failure.