OPERATING TEST COMMENTS AND RESOLUTIONS

FOR THE PRAIRIE ISLAND INITIAL EXAMINATION - AUGUST 2005

PRAIRIE ISLAND OPERATING TEST REVIEW COMMENTS

RO-A-1, Determine Maximum RCS Venting Time

1. Initial Conditions: If the containment and reactor parameters are readily available in the location that this task is normally performed, then the data should be obtained by actual observation of the instruments. This would make the task more operationally valid. Change location to in-plant. *Will be administered in the simulator.*

2. Steps to determine and record data should also be critical since calculations cannot be performed without the data. *Info is not currently available in the simulator complex.*

3. A tolerance for determining Hydrogen Flow Rate should be provided. *Not changed. The lines intersect exactly on the 2900 scfm line.*

4. Will applicant be given page 3 of Attachment M and Figure 8, or will they be expected to locate the form? *Examiner will provide copy of F5, Appendix B, Attachment M.*

RO-A-2, Establish High Flux at Shutdown Setpoint

1. JPM references same K/A as RO-A-1. *Discussed with exam writer to find accurate K/A in future submittals.*

2. Need to add step to determine background level and then to calculate setpoint (10X Background). These would be critical steps. *Additional steps not required for the JPM.*

RO-A-3, Perform the Shift Refueling Checklist

1. First two steps are non-critical since they are simply verifications and there is no adverse consequence if steps are not completed. *Changed to non-critical.*

2. Step 3 has a single switch manipulation with no verifiable indications to ensure that fan is running (except for report from field). *Fan is not running and must be started to correctly complete the JPM. Step is a critical task.*

3. Step 5 has no verifiable actions other than verbal report to Shift Supervisor. *Determine that fuel handling cannot begin is the critical task.*

RO-A-4, Conduct an Emergency Radiation Survey

1. Change last bullet of Initial Conditions to "Airborne activity and elevated general area radiation levels are anticipated..." *Last bullet changed.*

2. Change third bullet of Initial Conditions to "You are a member of a Response Team that has ...." *Not necessary. The initiating cue directs you to perform a survey for your team.*

3. Change Initiating Cue to read, "You have been assigned the task of performing the General Radiation Surveys, per F3-14.2, as..." *No change is necessary to the initiating cue.*

4. First step of JPM should be part of the initiating cue since procedure states that information is obtained from the Emergency Director. *No change is necessary.*

5. Question - Is electronic dosimeter used for task the same as one normally issued for entry into RCA? If so, what is the performer to do when dose rate alarm goes off? *Resolved during validation of JPM. Additional dosimetry is provided in supply cabinet.*

6. Need to provide evaluator with a map of area showing projected dose rates for feedback to applicant as he surveys the area. *Resolved during validation. Examiners provided with information necessary to provide adequate cues concerning rad levels.*

SRO-A-1, Respond to a Medical Emergency

1. Why isn't the PA announcement a critical step? *The following step to activate pagers is the critical task.*

2. If activating EMT pagers is critical, then need step for responding to pager call-backs. *Adding this step would only extend the JPM and wouldn't provide useful evaluation material.*

3. Why not complete checklist through step 5 (i.e., terminate when applicant indicates skipping step 5 and proceeding to step 6)? *Not necessary to examine the additional steps.*

SRO-A-2, Authorize Emergency Radiation Exposure

1. As ED, I would expect that form (PINGP 600) be completed when presented for authorization, especially since form requires REC concurrence signature. *Correct, but the initiating cue directs the applicant to perform the desired task.*

SRO-A-5, Issue Updated PAR Based on Wind Change

1. Allowable time needs to be reduced to allow time for communicator to complete call. *Agreed, time changed to 12 minutes.*

2. Applicant should only be informed that the JPM is time critical, and not told how much time is allowed for completion. *Agreed. The examiners will not tell the applicants how much time they have to complete the JPM.*

3. Is it normally the ED's job to fill out the form, or does he only review for accuracy and approval? *In this case it is the ED's job.*

JPM a., Lineup RWST to Charging During ATWS (Alternate Path)

1. What procedure specifies how to align RWST to charging or is this skill of the craft? *Skill of the craft. Applicant may use guidance from 1FR-S1.*

2. One critical step with no action to verify that boration is, in fact, occurring. *If an action to verify boration was occurring, it would be another non-critical task. Not added.*

JPM b., Perform Attachment L, Steam Line Isolation Failure (Alternate Path)

1. Why is verifying or making plant announcements considered a critical step? *Only under certain conditions. Verified and corrected in this JPM.*

2. Shouldn't step 4 be marked as critical per Note in last step? *Marked as critical.*

3. Shouldn't step 7 be marked as critical? *Marked as critical.*

JPM c., Inadvertent Train B Actuation While Shutdown

1. Since applicant is told that actuation was inadvertent (initiating cue), step 1 should not be critical. *Determination is made not to make transitions, which makes the step critical.*

2. Multiple action steps (stop RHR pump) should be divided into two separate JPM steps. *One step to shut off RHR pump incorporated.*

JPM d., Respond to Condenser High Pressure

1. Multiple action steps should be divided into separate JPM steps. *Agreed. Changes made to split steps into single actions for subsequent examinations.*

2. Since reactor is manually scrammed, JPM should include SCRAM immediate actions. *SCRAM actions will be evaluated during scenarios and are therefore not observed during the JPMs.*

JPM e., Lower PRT Level (Alternate Path)

1. Need to add step to stop 12 RCDT Pump (doesn't make sense to leave pump running without a suction path. *The portion of the task desired to be evaluated is complete. Shutting off the pump is not necessary.*

JPM f., Transfer Power to Offsite Power from D6 Diesel Generator

1. Shouldn't first step be critical? *Step is desired, but not critical.*

2. If DG C/S is placed in START to satisfy logic for parallel operation it should be critical step. *Agreed. Changed to critical.*

JPM g., Ejected Rod with Failure of Reactor Trip (Alternate Path) **(JPM replaced.)**

1. Identification of ejected rod is critical, otherwise remaining steps won't be performed.

2. What procedure directs actions for an ejected control rod?

3. Multiple action steps should be divided into separate JPM steps.

JPM h., Terminate Accidental Radioactive Release (**JPM replaced.)**

1. No performance steps other than direct Aux Bldg Operator actions.

JPM i., Startup the Hydrogen Recombiner

1. Step to determine pressure factor should be critical since subsequent step cannot be performed correctly without it. *Agree, changed to critical task.*

2. If there are adverse effects of not performing the HOLD steps, then steps should be critical. *Discussed during verification - not a critical task.*

JPM j., Respond to Bypassed Instrument Inverter

1. Steps 3, 4, and 6 are not critical since components are found in the expected position. This leaves only one critical step. *CB401 at step 6 will be found open and have to be closed. Steps 3 and 4 are non-critical.*

2. Should include step to verify inverter operating parameters within expected ranges. *Step would be non-critical in this case and does not add evaluation criteria.*

JPM k., F5 Appendix B, Attachment C - Unit 1 Reactor Operator Actions

1. Shouldn't step 5 be critical? *Agreed, changed to critical step.*

Simulator Scenarios - No pre-exam comments. Some minor changes were made as a result of validation.