

NRC COMMENTS TO THE PROPOSED OPERATING TEST

FOR THE BRAIDWOOD INITIAL EXAMINATION - MAY 2006

Braidwood Station 2006 Initial Exam Comments - Operating Test

- GENERAL - Some JPM steps consist of multiple procedure steps, including those with critical steps. It appears that open bullets designate the non-critical portions of the critical steps, whereas closed bullets are used to denote the critical portions. Designations should be reviewed during NRC validation to ensure that "required/not required" designations are accurate. **Validated during exam review. The author intended for closed bullets to be critical steps while open bullets were non-critical. This was not true for the scenarios where closed bullets were expected actions and open bullets were actions that the applicants may take but were not required to take. Critical items in scenarios are designated as such in the left column of the scenario write-up.**
- There are JPMs which cover similar areas or may overlap with the scenario coverage. Specifically:
- There are 3 JPMs having to do with Fire Protection. **The JPMs only use Fire Protection as a springboard to something else.**
 - Loss of Instrument Bus 211 is covered in Scenario 06-2 and in JPM IP-604. **The actions are completely separate. One has actions in the plant to swap power supplies in the aux electric room, the control room scenario uses a loss of the bus to complicate and drive the major transient later in the scenario.**
 - ATWS is covered in Scenario 06-3 and in JPM SIM-108. **The JPM was an alternate path JPM for emergency boration. The emergency boration in the scenario was uncomplicated with no credit for an event was awarded.**
- Multiple cues are provided without detailed explanation within single JPM steps. This should be considered during NRC validation to ensure that adequate and consistent cues are provided or if some can be included in the initiating cues and eliminated. Also, cues should be descriptive ("the switch is in the DOWN position") versus indicating the result of the action ("the switch is OFF"). **The cues were provided in the event the JPM was simulated in the control room and was written as if it were being administered during a requalification examination. The examiners did not use the cues during administration of the examination.**
- SPECIFIC - IP-209 requires a key - Where is it found? Also, is it required to warn the other unit that a cabinet door is to be opened which causes an annunciator? **Resolved during validation of the exam.**

During validation of the operating test a Control Room JPM (JPM CR b.) was replaced. The JPM was to "Establish Automatic Pzr Level Control with Failed 1CV121." The Chief Examiner determined there was no evaluation gained because of the JPM's simplicity and dis-allowed the JPM. It was replaced with a control room JPM to "Establish Excess Letdown to the Volume Control Tank." The replaced JPM had been allowed on an earlier NRC examination and the station expected it would be allowed again.