

**NRC COMMENTS TO THE OPERATING TEST  
FOR THE PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
INITIAL EXAMINATION - JULY 2007**

## Operating Test Comments

No comments on the outline submittal.

### Admin JPMs (ES-301-1):

Comment	Resolution
(-1) NRC: Admin-7S, "Take Compensatory Actions for a Fire Detector Out of Service" (A-1, RO): 1) System JPM because it involves mostly switch manipulation. Admin tasks generally don't involve operation or manipulation of system components. An exception would be the operation of a meter/recorder selector switch, or range switch, that affects only the indication of the parameter being monitored, and has no effect on actuation logic.	1) Replaced with Admin-16, "Remove a Rad Monitor From Service" which involves paperwork and operation of switch with no effect on actuation logic.
NRC: Admin-43, "Determine Time to Boiling During Reduced Inventory Operations" (A-2, RO/SRO): 1) Delete procedure reference in the Initiating Cue.	1) Procedure reference in IC will be deleted.
NRC: Admin-40, "Perform a RCS Leakage Investigation," (A-3, RO/SRO): 1) Include PRT data (ie, all tank data) so that surveillance procedure can be competed.	1) All PRT tank data will be provided.

### System JPMs (ES-301-2):

Comment	Resolution
(-1) JPM b. "Perform RCS Leakage Determination Using Board Indications," (S-2): 1) This is an equipment or conduct of operations admin JPM because there is no operation or manipulation of system components.	1) JPM replaced with "Place 11 and 12 Accumulators in Service."
JPM g. "NI Fails Low During Reactor Startup"	1) Licensee replaced with JPM RD-5S, "Pressure Instrument PT-485 Fails Low" prior to proposed exam submittal.
JPM h. "Respond to Abnormal Radiation Level During Waste Gas Release"	1) Licensee replaced with JPM RM-3SF-1, "Start Spent Fuel Pool Special Ventilation System From the Control Room" prior to proposed exam submittal because JPM actions no longer performed by licensed operators.
JPM k. "Emergency Starting of 122 Diesel Fire Pump"	1) Licensee replaced with JPM CL-7, "Emergency Start of 12 Diesel Driven Cooling Water Pump" prior to proposed exam submittal.

## Operating Test Comments

<p>(-1) JPM k. "Emergency Start of 12 Diesel Driven Cooling Water Pump,"(CL-7, alternate path): 1) This JPM task has been used on the previous two NRC exams. The alternate path was identified as failure of the first air line start solenoid that required the operator to use the opposite air line start solenoid. The system is designed with two air lines, each with an air start solenoid; therefore, the alternate path should be a failure of the air system to start the diesel, and require the operator to use an alternate means to start the diesel.</p>	<p>1) JPM replaced with AF-16F-1, "Local Operation of 12 TDAFWP."</p>
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## Operating Test Comments

### Scenarios:

Comment	Resolution
<b>SCENARIO 1:</b>	
Swap Events 1 and 2 to reduce time of scenario.	Swapped Events 1 and 2.
Event 1: 1) Require a larger power reduction and revise reason for power decrease to instill sense of urgency for applicants to reduce power. 2) Give SRO and ATC credit for R, delete SRO credit for N.	1) Require power reduction from 100 to 45% for condenser tube cleaning.
Event 7, give C to SRO and ATC (vice BOP).	
<b>SCENARIO 2:</b>	
Event 1: Give both SRO and ATC credit for R, delete SRO credit for N.	