

POST-EXAM COMMENTS

(Green Paper)

Licensee Submitted Post-Exam Comments

Attached

None - LTR DTD 9/6/2007

Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

Brian O'Grady
Vice President, Browns Ferry Nuclear Plant

September 6, 2007

Dr. William D. Travers
Regional Administrator
Region II
U.S. Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center
61 Forsyth Street S.W., Suite 23T85
Atlanta, Georgia 30303-8931

Dear Sir:

| | | |
|----------------------------|---|--------------------|
| In the Matter of |) | Docket Nos. 50-259 |
| Tennessee Valley Authority |) | 50-260 |
| | | 50-296 |

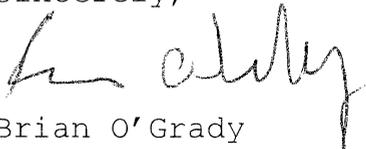
**BROWNS FERRY NUCLEAR PLANT (BFN) - COMMENTS ON THE COMPLETED
AUGUST 31, 2007 NRC EXAMINATION**

This letter is submitted in accordance with the NRC Operator Licensing Examiner Standards (NUREG-1021), Examiner Standard (ES)-402, Attachment 3. The Attachment states that the Licensee should submit any formal comments within 5 working days after the administration of the examination.

Based on our review and the grading of the written examination administered on August 31, 2007, TVA has comments. Enclosure contains TVA's comments.

If you have any questions, please telephone Mr. Bob Scillian at (256) 729-3439.

Sincerely,



Brian O'Grady

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Dr. William D. Travers

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cc:

(Via NRC Electronic Distribution) (W/O Enclosure)
Mr. Nancy L. Salgado, Chief, Operator Licensing Branch
U.S. Nuclear Regulatory Commission
Mail Stop OWFN 0-12H2
Washington, D.C. 20555-0001

Mr. Robert C. Haag, Chief
Operator Licensing and Human Performance Branch
U.S. Nuclear Regulatory Commission
Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street S.W., Suite 23T85
Atlanta, Georgia 30303-8931

Mr. Ronald Aiello, Inspector
Operator Licensing and Human Performance Branch
Division of Reactor Safety, Region II
U.S. Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center
61 Forsyth Street S.W., Suite 23T85
Atlanta, Georgia 30303-8931

Mr. Tilda Liu, Branch Chief,
U.S. Nuclear Regulatory Commission, Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street S.W., Suite 23T85
Atlanta, Georgia 30303-8931

NRC Resident Inspector
Browns Ferry Nuclear Plant
10833 Shaw Road
Athens, Alabama 35611-6970

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop: OWFN, P1-35
Washington, D.C. 20555-0001

Eva A. Brown, Project Manager
U.S. Nuclear Regulatory Commission
(MS 08G9)
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852-2739

ENCLOSURE

- List the NRC question, answer, and reference

The following discussion is concerning SRO Question 17 (KA G2.1.12) administered on August 31, 2007 to 3 SRO Candidates at Browns Ferry Nuclear Plant. The question posed a situation which required multiple units and multiple sections of Technical Specifications to be applied. The correct answer (B) was the combination of actions that would satisfy all units Technical Specifications. Specifically the question posed a situation where two units met the applicability of TS 3.8.1 (AC Sources-Operating) and another unit met the applicability of TS 3.8.2 (AC Sources-Shutdown) along with TS 3.6.4.3. The correct answer (B) exploited the difference in the Operating and Shutdown TS associated with power supplies. The references for this question are Browns Ferry Unit 1 and 2 Technical Specification 3.8.1 and Unit 3 Technical Specification 3.8.2, and Units 1, 2, 3 Technical Specifications 3.6.4.3. This question is attached.

- State the comment and make a recommendation

On Friday, August 31, 2007, during the HLT 0606 NRC written examination, a candidate questioned the information provided in SRO question number 17 (KA G2.1.12). The response provided to the candidate by the proctor was "Answer the question as written". The exam proctor later contacted the NRC Exam Lead Ron Aiello and he asked that a comment be provided in writing to the NRC concerning the validity of the question specifically the allowance of 4 hours to declare the second train of SGT inoperable. Upon final review by the Browns Ferry exam team, the question is correct as written and no changes are needed to the exam. The following is a discussion on the specifics of the question.

- Support the comment with a reference and provide a copy if it was not included in the original reference material submittal.

This question asked the candidate to apply Tech Specs (TS) to the Standby Gas Treatment (SGT) system during plant operations with the power supply to one of the SGT trains inoperable along with the inoperability of another train of SGT. The Technical Specifications for power availability to the SGT trains required the second train of SGT to be declared inoperable within 4 hours after any other train of SGT being inoperable for reasons other than power supply failure by AC Sources-Operating (TS 3.8.1). Unit 3 was in Mode 5 with OPDRV in progress and their Technical Specifications for that condition was AC Sources-Shutdown (TS 3.8.2). The answer that was identified as the correct answer stated that the 2 operating units were required to enter LCO 3.0.3 four hours after identification of the inoperability of the B train of SGT since the power supply for C train was already inoperable, and the unit that was in Mode 5 with OPDRVs in progress answer stated that actions must be initiated immediately to stop work that resulted in the OPDRV. The fact that there was no 4 hour period allowed for the OPDRV was the source of the candidate's question. This is correct since there is a difference in the wording and requirements for AC Sources-Operating and AC

Sources-Shutdown. The 4 hour delay period specified in TS 3.8.1 is not allowed by TS 3.8.2 since less equipment is required to be operable while shutdown. The immediate requirement to initiate actions to suspend OPDRV is consistent from TS 3.8.2 (AC Sources-Shutdown) and TS 3.6.4.3 (SGT) for operation in Mode 5 with an OPDRV in progress and two trains of SGT inoperable. All the references for this question were contained in the original submittal of exam reference materials.

The exam question has only one correct answer, and it is our recommendation that this question not be deleted. One SRO candidate missed the question and this person was not the one who questioned the validity of the choices provided during the administration of the exam. The exam proctor did not provide any information to the candidates during the examination about the validity of the question.

1. OPL171.018 122 SRO Question 17 KA# G2.1.12

Unit 1 is operating at 100% power.

Unit 2 is operating at 100% power.

Unit 3 is refueling (MODE 5), fuel movement is in progress. Recirc pump 3A suction line work in progress has potential to drain the RPV. The 3ED D/G is out of service for an inspection.

During performance of the monthly SBGT SR, B SBGT fails to start.

REFERENCE PROVIDED

Which ONE of the following describes the required actions?

- A. Enter LCO 3.0.3 on Unit 1 and 2 immediately. Suspend Unit 3 fuel movement immediately.
- B. Enter LCO 3.0.3 on Unit 1 and 2 in 4 hours. Initiate actions to suspend OPDRVs immediately.
- C. Be in Mode 3 on Unit 1 and 2 in 12 hours and Mode 4 in 36 hours. Start A and C SBGT trains in 4 hours.
- D. Be in Mode 3 on Unit 1 and 2 in 12 hours and Mode 4 in 36 hours. Initiate actions to suspend OPDRVs immediately.

G2.1.12 Ability to apply technical specifications for a system.

PROVIDE REFERENCE UNIT 3 TECH SPECS SECTIONS 3.6 AND 3.8

References: Unit 3 Tech Specs section 3.6.4.3 pages 3.6-51, 52 and 53
Unit 3 Tech Specs section 3.8.1 page 3.8-7

- A. incorrect, supported system LCO is not applied for 4 hours.
- B. correct answer
- C. incorrect, these actions are required for failure to meet LCO for 1 SBGT train inop.
- D. incorrect, these actions are required for failure to meet LCO for 1 SBGT train inop.

Distractors use misconceptions associated with SBGT operability and incorrect

implementation of Tech Specs. ie SBGT operability is no longer required for fuel movement since last section 3.6 Tech Spec revision.
RFA approved 8/1/07

Answer: B