

**NRC COMMENTS TO THE PROPOSED OPERATING TEST
FOR THE FERMI INITIAL EXAM - JANUARY 2008**

Operating Test Comments

Admin JPMs (ES-301-1):

Comment	Resolution
<p>(-1) ADMIN 1. EC / HPCI Surveillance Procedure / ro,sro (Generic 2.2.12): 1) JPM does not match referenced KA ("2.2.12 Knowledge of surveillance procedures") because it only requires knowledge of location of HPCI System control room indications.</p>	<p>1) KA changed to 2.2.14 which matches the JPM as written.</p>
<p>(-1) ADMIN 2. CO1 / Core Thermal Limit Verification / ro,sro (Generic 2.1.7): 1) JPM Steps 4 and 5 are not critical. If applicant does not place a "check" in the box, or identify the correct date and time it is only an errata type problem. There is no safety significance associated with the mistake. 2) Only one critical step for RO. Need at least one more RO critical item (ie, JPM Steps 1, 2, or 3?) or replace JPM.</p>	<p>1) Steps 4 and 5 are not critical.</p> <p>2) Identified the following steps as critical for the RO: -identify MAPRAT greater than 1 and inform CRS; -applicant does not initial acceptance criteria (ie, indicates understanding that surveillance is not SAT).</p>
<p>ADMIN 3. RC / Dose Limit / ro (Generic 2.3.4): 1) Wording of KA Generic 2.3.4 is from NUREG 1123, Revision 2. NUREG 1123, Revision 2, Supplement Final, has slightly different wording for the KA. 2) The following JPM Steps are not critical: Step 3 (applicant doesn't have to use procedure, and is being given copy of form); Step 4 (applicant's name and SSN); Step 6, examiner will cue the applicant with correct answer; Steps 7 and 8 are not critical (signatures are errata). There is no safety significance associated with any of these steps.</p>	<p>1) Verified and corrected KA wording.</p> <p>2) Steps 3, 4, 6, 7, and 8 are not critical.</p>
<p>ADMIN 4. CO2 / Complete NPTD Form / ro (Generic 2.4.39): 1) On Form ES-301-1, this JPM is listed as Conduct of Operations, but it should be under Emergency Plan because KA Generics for Section 2.4 is Emergency Procedures / Plan; Generics Section 2.1. Move this JPM to Emergency Plan on RO Form ES-301-1. 2) JPM Step 6 is not critical (ED signature is errata, not safety significant) 3) JPM Step 3, will the meteorological data be the same for all applicants (ie, is it actual data that may change depending on current conditions?). 4) 5) JPM Steps 7-9, why are these at discretion of the examiner? Title says "...complete and communicate..." Make steps part of JPM. 5) Is this JPM time critical? Task Standard mentions 30 minutes. 6) Provide an answer KEY with the examiner's JPM.</p>	<p>1) Moved this JPM to the Emergency Procedures / Plan section of ES-301-1.</p> <p>2) JPM steps 1 and 6 are not critical.</p> <p>3) Meteorological data comes from the simulator computer, so it will be same for all applicants.</p> <p>4) JPM steps 7-9 are part of the JPM and identified as critical.</p> <p>5) No, procedure is not critical, procedure says "should."</p> <p>6) Key will be provided to examiner.</p>

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<p>(-1) ADMIN 6. RC / Dose Limit and Extension / sro (Generic 2.3.4): 1) KA Generic 2.3.4 wording on SRO Form ES-301-1 does not match KA wording on ADMIN 6 JPM. Make KA wording for the RO and SRO Forms ES-301-1, ADMIN 3, and ADMIN 6 consistent with NUREG 1123, Revision 2, Supplement Final, Generic 2.3.4. 2) Don't give area dose rate in the Initial Cue because it is a critical step, should be determined from the survey. Also, Smith's accumulated dose is given in the Initial Cue, so it does not have to be given again by the examiner. 3) "Obtain Procedure MRP 12 and form MRP12001 is considered a critical step, so it cannot be provided until the applicant determines which procedure is needed and locates a copy. 4) The following JPM Steps are not critical: Step 3 (applicant doesn't have to use procedure, and is being given copy of form); Step 4 (applicant's name and SSN); Steps 7 - 10 are not critical (signatures are errata, and are identified on the form, there is no safety significance associated with any of these steps).</p>	<p>1) KA wording corrected.</p> <p>2) Will remove dose cue from Initiating Cue.</p> <p>3) Intent was for applicant to identify and locate necessary procedures / forms. Will clarify in JPM.</p> <p>4) JPM steps 4, and 7-10 are not critical.</p>
<p>ADMIN 7. EP / PARS and Classification / sro (Generic 2.4.40): 1) JPM is time critical. 2) Have "restricted procedure" available for exam, need to control. 3) Redact JPM from ADAMS?</p>	<p>1) JPM is time critical. 2) Will have restricted procedure available for exam. 3) NRC redact JPM from ADAMS.</p>

System JPMs (ES-301-2):

Comment	Resolution
<p>JPM b. Refuel Floor High Rad (P,D,A,L,S): 1) Since multiple procedural steps are referenced in this JPM, denote the applicable procedure number with each of the JPM steps.</p>	<p>1) This technique is currently being incorporated into the licensee's program.</p>
<p>JPM c. Manually Initiate SRV LLS (D,S): 1) Remove the 4th bullet of the Initial Conditions and incorporate into the Initiating Cue.</p>	<p>1) Moved bullet to Initiating Cue.</p>
<p>(-1) JPM f. Multiple Rod Drifts (D,A,S): 1) JPM Step 7 is not critical because placing the RMS will not cause a plant scram. As a result, the JPM only has one critical step.</p>	<p>1) Additional critical step is to recognize multiple rod drifts; and depressing RPS Manual Scram PBs.</p>
<p>JPM i. Restore SDC (N,EN,A,S): 1) SRO-U Form ES-301-2 and JPM list multiple KAs, select only A4.05 (3 "A4s" are listed).</p>	<p>1) Only referenced one KA on ES-301-2 and JPM.</p>
<p>JPM j. Defeat ARI Logic Trips (D,R,E): 1) Add KAs 295037 to Form ES-301-1, and 216000 to JPM.</p>	<p>1) KAs 295037 added to Form ES-301-1, and 216000 to JPM.</p>

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JPM I. Shift IAS Dryers (D,R,E): 1) Move the last 4 bullets of the Initiating Cue to the Initial Conditions.	1) Last 4 bullets of the Initiating Cue moved to Initial Conditions.
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Scenarios:

Comment	Resolution
SCENARIO 1:	
(-1) Event 7 -is SBFW required for RWL restoration? If not, what is the significance if it is not started? If no significance, can't use as an event.	-Delete credit for SBFW "C"
SCENARIO 2:	
Event 3 -include East Condenser Air Leak, label it as "M (All)"	-Incorporated comment on D-1 sheet.
SCENARIO 3:	
SCENARIO 4 (spare):	
(-1) Event 2 -not an instrument failure "I (SRO)" for SRO, but is a TS.	-Deleted loss of RWL indication as an "I" failure.