

**NRC COMMENTS TO THE PROPOSED OPERATING TEST
FOR THE DRESDEN INITIAL EXAM - MARCH 2008**

DRESDEN 2008 EXAM SCENARIO REVIEW COMMENTS

1) Scenario ILT-N-1

- a) Comment was made during Outline Review that the "RPIS Failure" event has been used on last two exams.
 - i) Licensee's response was that all three crews misdiagnosed the event on the last exam and the Licensee wants to verify that training of the current ILT class has been effective.
 - ii) The License exam should not be used as a means to measure effectiveness of corrective actions. Since additional training and focus has been put on this event, use on the exam may not be discriminative.

Resolution: *RPIS failure was replaced with Control Rod Over-travel malfunction.*

b) Scenario Description on page 3

- i) Typo in 5th bullet; "R~~o~~d Mon" should be "R~~a~~d Mon"
- ii) Also this event does not appear in Outline
- iii) Appears that 5th bullet should be eliminated altogether.

Resolution: *Item deleted. Pasting error from previous scenario.*

c) Event 7 (ATWS)

- i) Potential Problem – Since scenario starts at low power Rx pressure is likely drop following scram due to lack of decay heat. Depending on how long crew takes to implement ATWS actions, RPV pressure may decay to point where it may be difficult force DW pressure to point requiring DW sprays.

Resolution: *Power level was verified adequate during validation. No changes required.*

d) Critical Tasks (page 20)

- i) It appears that injecting Boron during the scenario should not be allowed as a method to satisfy the critical task.

Resolution: *No change was made. Scenario designed to ensure boron injection not required.*

e) References

- i) Delete DAN 902-3 D-16

Resolution: *No change was made.*

2) Scenario ILT-N-2

- a) Question – Can the Circ Water Suction clogging event be expanded to include a loss of CW without a loss of essential service water systems.

Resolution: *Suction clogging malfunction alters current indicator only so pumps must be manually stopped or additional malfunctions entered to cause pump trips. No changes made.*

3) Scenario ILT-N-3

a) Event descriptions (page 4)

- i) Event 4 title typo – Initiation should be Isolation
- ii) Event 6 title is loss of feed; description is steam line break.

Resolution: *Changes were made to address comments.*

b) Event Four (HPCI Isolation)

- i) Recommend using an actual line break (confined to the HPCI corner room) instead of instrument failure to initiate event.

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Resolution: *No change was made.*

ii) If desired fail only one of the isolation valves.

Resolution: *No change was made.*

c) Event Seven (loss of RPV level indications)

i) Asked question during outline review related to what the common cause was that caused a loss of all level indications. Licensee response was heating of reference legs or breaking of reference legs.

ii) There is no indication in the scenario of an event which leads to reference leg heating or line breaks.

Resolution: *Several indicators are lost due to instrument power malfunction.*

Scenario revised to include notification at beginning of scenario that Engineering has received a part 21 notification that Bailey level instrument cards may have a manufacturers defect and engineering is evaluating what must be done. This was added to provide some credibility to loss of all remaining level instrumentation.

DRESDEN 2008 ILT EXAM JPM REVIEW COMMENTS

1) ADMIN JPMs

- a) RO JPM d – CCSW Activity Calculation (A-N-4-R)
 - i) Revise Initial Condition 3 to state that “Only the ‘A’ CCSW Heat Exchanger is being placed in service.
 - ii) Revise initiating cue – “...CCSW Heat Exchanger”
 - iii) Add step and appropriate cues to correct errors similar to SRO JPM a (A-N-1-S)

Resolution: Changes were made to address comments..

- b) SRO JPM c – Verify SBLC Tank Heater Surveillance (A-N-3-S)
 - i) Add step and appropriate cues to correct errors similar to SRO JPM a (A-N-1-S)
 - ii) Should be a step to initiate appropriate TS actions

Resolution: Step added to evaluate that applicant makes or initiates the necessary corrections and notifies shift supervisor that TS will need to be reviewed.

- c) SRO JPM d – See comments of for RO JPM d

- d) SRO JPM e – Determine Emergency Classification and Fill Out NARS Form
 - i) Step 2 of the JPM requires the applicant to complete the NARS form in preparation for communication to the State and Local authorities. This should be should be completed such that the notification can be initiated (roll call completed) within 15 minutes of the declaration time (block 5). This means that the applicant has less than 15 minutes (nominally 10 minutes) to complete form. Thus there are two critical times: 15 minutes to make the declaration; and 10 minutes (TBD by licensee) from the time of declaration to complete the NARS form and deliver to the communicator.

Resolution: Change was made to evaluate both critical time measurements.

2) System JPMs

- a) JPM a – Injection of Standby Liquid Control System (S-N-a)
 - i) Typo in 2nd NOTE – should be “The A or B SBLC....”

Resolution: Change made.

- b) JPM b – Start the Third Reactor Feed Pump (S-N-b)

- i) Shouldn't step 2 be critical?
 - ii) Why is step 15 critical?

Resolution: Step 2 was evaluated and no change was made. Step 15 was changed to be NOT critical.

- c) JPM d – Lineup LPCI to CST for Injection (S-N-d)

- i) Remove step reference from initiating cue
 - ii) Step 15 should also be critical since pressure is not as expected and a decision to not continue is based on that reading.
 - iii) Since the goal is to raise RPV water level, in order for this to be alternate path an alternate injection system needs to be started instead.

Resolution: Step number reference removed from initiating cue. Step 15 was designated a critical step. It was determined that no additional actions to start alternate injection system were necessary.

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- d) JPM e – Verify Spurious Group 1 Isolation – Incomplete (S-C-e)
 - i) Steps 1-4 should not be critical.
Resolution: Steps 1-4 were designated as NOT critical.
- e) JPM f – Crosstie Bus 23-1 and Bus 33-1 (S-N-f)
 - i) Since there is no ECCS signal present, recommend leaving loads in normal configuration and let applicant decide whether to place in PTL or not.
 - ii) Need a response cue for procedure step G.2.e
Resolution: Comments were incorporated.
- f) JPM g – Drive TIP Detector to the Isolation Test Position (S-N-g)
 - i) Why isn't step 2 critical?
 - ii) What conditions would require the applicant to cycle the MODE switch in procedure step G.3.h
 - iii) Why isn't step 7 critical?
 - iv) Insert evaluator note before step 14 to address that procedure step G.3.q is not required to be performed due to plant conditions.
Resolution: Steps 2 and 7 were designated as Critical. Notes were added to address the remaining two comments.
- g) JPM h – Align Charcoal Adsorber Filters in Parallel Mode of Operation (S-N-h)
 - i) Remove step reference from initiating cue
Resolution: Step reference removed from initiating cue.
- h) JPM j – Manual Fill of Unit 3 Emergency Diesel Generator Day Tank ((P-C-j)
 - i) Do Aux NSOs have a key ring that would have the DS key?
Resolution: NSOs have a duty key ring. No change was made.
- i) JPM k – Valve In Control Room Emergency Breathing Air Supply (S-N-k)
 - i) Remove step reference from initiating cue
 - ii) Do Aux NSOs have a key ring that would have the DS key?
Resolution: OK as is. No changes were made.