

**NRC COMMENTS/RESOLUTION ON THE PROPOSED  
OPERATING TEST FOR THE LASALLE INITIAL EXAM**

**AUGUST 2008**

Radiation Control: SPDS Radiation Release Box in Alarm

- a. Is Step 5 really critical for RO JPM? **RESOLUTION: Yes is critical needs cue from Chemistry to complete JPM**

Emergency Preparedness: Notification Requirements

- a. (No comments)

**Simulator JPM Comments**

a: Upshift the Recirc Pumps

- a. Are JPM Steps 9 – 12 critical? For instance, are the low power and low flow bypasses an interlock for starting the recirc pump? **RESOLUTION: steps are critical to operator of new control system**
- b. Note after JPM Step 18, How much 'delay' is acceptable? Are there any measureable parameters that will go into an alarm status indicating that the candidate has taken too much time and should fail the JPM (eg: an alarm indicating excessive temperature differential between loops)? **RESOLUTION: Examiner should ask follow-up question if delay appears excessive.**

b: Initiate HPCS with a Failure of Manual PB

- a. JPM Steps 1 & 2 are not critical if the system does not actuate!  
**RESOLUTION: changed to not critical**

c: Initiate ADS

- a. (No comments)

d: Anticipate RPV Blowdown

- a. Initiating Cue should read: “.. has directed you depressurize the RPV using the main turbine bypass valves..” Need to add to before depressurize and make BPV's plural! **RESOLUTION: Cue changed**

e: Recover from Group 10 Isolation

- a. (No comments)

f: Reset Half-Scram

- a. (No comments)

g: Start Service Water Pumps

- a. Initiating Cue: Suggest giving applicant only Attachment A of LOA-FP-101 in lieu of giving out the entire procedure (142 pages in length). If applicant wants to look at Limitations and Precautions section, or other parts of the procedure, he can pull the procedure from the bookshelf. **RESOLUTION: Agreed**
- b. Initiating Cue states, “.. INFORM the [US] when LOA-FP-101 Attachment A is completed up to and including step E.5.” There is no Step E.5 in LOA-FP-101! Need to change cue! **RESOLUTION: cue changed**
- c. Step 8 in JPM is missing. I believe it has applicant place switch at Remote Shutdown Panel in AFTER STOP position. Missing critical step E.3 of LOP-WS-03 at remote S/D panel. **RESOLUTION: step added**

h: Start Mechanical Vacuum Pump

- a. Step 5 of JPM: doe should be spelled dose. **RESOLUTION: corrected**
- b. Cue for Step 4, is it necessary to cue the applicant what MSL Rad monitors are reading? Can't he do this himself? **RESOLUTION: can not simulate**

**In-Plant JPM Comments**

i: Emergency Start of '0' EDG

- a. JPM Step 16, need to include how relay would look in OPEN position.  
**RESOLUTION: relay will be open as found in the JPM**

j: Remove Fuses for a Stuck Open SRV

- a. (No Comments)

k: Line up the CRD System for Injection into the RPV

- a. Are JPM Steps 6 – 9 critical if they only 'verify' that valve is open?  
**RESOLUTION: steps 6 and 8 not critical**

## Review Comments on LaSalle ILT Scenarios:

### Scenario 1:

1. Does Event 2 duplicate JPM f, "Reset Half-Scram with Blown Fuse?"  
**RESOLUTION: event is different**
2. Event 2, 3: May want to remove reference to TS from BOP Actions column and place in SRO column since SRO has TS actions. **RESOLUTION: added to SRO actions**
3. Remove BOP from Event 3 on S-1 sheet since can not credit BOP for Normal and a component failure **RESOLUTION: DONE**
4. Event 4: Include steps performed by BOP in control room to restart IN system. (pg 7) **RESOLUTION: steps added**
5. Events 5 & 6: Does RO and not BOP have responsibility for TDRFP? (pgs 8, 9) **RESOLUTION: RO**
6. Event 9 can not be credited as a component failure but as the initiator. Items 10 and 11 are the consequences of the component failure and can only be credited as one component failure. **RESOLUTION: agreed**
7. Major Event: Need to have valves operated by BOP from CR to place both the suppression chamber and the drywell sprays in operation included in BOP Action column. (pg 14) **RESOLUTION: done**
8. As a consequence of these changes, the ES 301-5 form also needs to be changed. **RESOLUTION: done**

### Scenario 2:

1. Event 3 & 4: Need to include in BOP Action column the operator actions for steps starting at Step 3.6 of Procedure LOP-VR-01. (pg 7) **RESOLUTION: done**
2. Event 5: If RO performs panel manipulations, need to include those actions in the Actions column for RO. **RESOLUTION: done**
3. Event 6: Need to include panel manipulations for BOP swapping RFPs in the Actions column for BOP. **RESOLUTION: done**
4. Event 7: As written it appears that there are no panel manipulations for the BOP for this event. If there are, need to include them in the Action column. **RESOLUTION: BOP must close isolation valves steps added**
5. Event 8: Does RO insert a scram without SRO concurrence or should the SRO Action column have "Directs RO to Scram Rx..?" **RESOLUTION: action added to SRO column**
6. Major Event: Need to know specific actions performed by RO other than, "Inserts rods per LGA-NB-01." Also, who is controlling Rx pressure with EHC pump OOS? Need to have those actions included in Actions column for proper individual. **RESOLUTION: action added**

### Spare Scenario:

S-1 Form: I note that the normal (Event 2), like the normal events in the two previous scenarios starts out with a surveillance test, but the test fails and results in a TS review for the SRO candidate. However, like the first scenario, the licensee gives credit to the BOP for a component malfunction for this resulting second event. The spare scenario likewise gives credit to the BOP operator for responding to this component malfunction. Doing a bean count, the BOP does not have enough beans if credit for the faulted surveillance test is not given. However, since the spare scenario generally is given to

the RO or SRO candidate who missed a bean, there should be enough beans for the BOP!

The spare scenario appears to dig a little deeper into the LGA's than the two other scenarios!

Overall, the spare scenario looks OK!

**RESOLUTION: It was decided that the spare scenario would be run to minimize the use of surrogates. Only the RO and SRO positions will need testing during this scenario. This scenario was extensively modified during validation.**

## JPM Review comments

### Administrative JPMs

#### Conduct of Ops: Remote S/D Monitoring Instrument Checks

The RO JPM is written with two errors. The RO will perform two sections of the surveillance (Section 5 and 9). This means the only sections being performed have errors in them. Perhaps we can have them perform sections 6, 7, & 8 (sections with no errors) to determine if they can locate and document 'normal' conditions. **RESOLUTION: JPM rewritten to perform sections 5,7,8,9**

- a. The RO JPM is presently numbered, "07-01 NRC SRO.RO Admin CO 1." Since this is an RO Only JPM, I would suggest deleting the SRO reference from the title to avoid confusion. **RESOLUTION: DONE**
- b. For SRO JPM, comment is similar to first RO JPM comment. Presently, sections 6, 7, 8, 10, and 11 are N/A'd! Why don't we have SRO's review entire surveillance test? Isn't this how they would perform ST reviews on shift? **RESOLUTION: Suggested change made**

#### Conduct of Ops: Scram Time Report

- a. Delete any reference to identifying that control rods are not indicating "00" in initial Cue. JPM Initial Cue states, "Three control rods are not indicating "00" on RWM." (The rods are identified in the cue.) The applicant's task is to "determine if all rods are in." Why do we tell them the answer before we administer the JPM?! Shouldn't we have them identify which control rods are NOT inserted by looking at the P603 panel indication as part of the JPM!? **RESOLUTION: panel indications will be used to perform the JPM**
- b. Unlabeled Step prior to Step 12: instead of having the applicant print the report (which takes 5 minutes), why don't we either review it electronically, or cue the operator that the report is printed out and hand him a copy. **RESOLUTION: will have a preprinted report available**

#### Equipment Control: Perform Out of Service on Water Leg Pump

- a. Is the sequence for hanging tags a critical step also? **RESOLUTION: not for this JPM**
- b. Does the applicant fill out a tagging sheet also? **RESOLUTION: Yes a blank form will be provided**
- c. Initiating Cue: Says verify tagout but there is no tagout to verify! I believe it should read perform tagout! **RESOLUTION: cue changed**