

## Comments to Outline Submittal

Scenario 2010-1: Event 7, Large Break LOCA. Can LOCA be ramped in to allow operators to make a decision and take actions to trip the plant in lieu of the plant tripping on its own? RE: Licensee will review possibility to use "leak before break" philosophy so operators will diagnose and decide to trip and SI plant in lieu of the 'machine' doing it for them!

Event 8: If operators manually trip and SI, will event 8 still happen or will 1E RHR and SI pump start thus negating this event? RE: No, slave relay will fail and pumps will not start if SI is manually actuated or automatically actuated. Still requires manual operator action

Event 9: Are there any actions to be taken by the operators for loss of the 1W RHR pump or does this change any mitigation strategy? RE: Event ensures that the 1E RHR pump is started within 15 minutes to hasten the operators along. May not be able to be counted as a 'bean' unless a crew had not started the 1E RHR pump previously.

Events 8 & 9: Why are these events considered credit for the RO and not the BOP? RE: Yes this is an RO responsible response.

Scenario 2010-2: Event 6, SG PORV Failure. How does this result in a radiation monitor becoming inoperable? RE: Written in TS as such.

Scenario 2010-3: Event 10: How does RO get credit for this and not the BOP? RE: This is an RO responsible response on an RO panel! Also, there are creditable actions for this – operator must manually start the pump.

Scenario 2010-4: Since none of these scenarios start with the turbine off line (low power), is it possible to change this scenario to a low power scenario without affecting any event responses? RE: Licensee response is that with turbine off line (~ 8% power), need extra bodies in CR to control SGWL in manual for each of 4 SGs, to place turbine on line requires additional people. Licensee states that with reactor power less than 50%, need extra operators on panels to place MSRs and heater drain pumps in service - not befitting for 3-man crew operations.

Event 9: How does RO get credit for this and not BOP? RE: RO responsible panel and actions.

Spare Scenario: Not submitted or reviewed, but must be validated during site visit! RE: Licensee will have spare scenario ready for OV week.

Admin JPMs: Looks like 3 admin JPMs are done by both RO and SRO applicants. Are SRO's expected to do these tasks in the plant? RE: Yes, three admin JPMs are done by both RO and SRO's in plant. Since DC Cook is a non-union site, both SRO's and RO's are expected to perform surveillance tests.

Written Exam: How are K/A's deleted, by the computer program or manually after computer output reviewed? RE: The later. K/A's are manually deleted and documented on 401-4 form if question can not be fitted to the K/A