

Attachment A Facility Comments for Question # 78

Comment:

The facility recommends accepting D as an alternate acceptable answer.

The initial power level for the question was 95% with a small fuel element failure and a Dose equivalent I-131 sample of $40\mu\text{Ci/gm}$. The SRO applicants were given a copy of Tech Spec 3.4.16 RCS Specific Activity and Tech Spec Figure 3.4.16-1 (Attachments 78-1 and 78-2). The applicants were asked to identify the Tech Spec required action and the bases for the action. LCO 3.4.16 Condition A is NOT met since the Dose equivalent I-131 sample of $40\mu\text{Ci/gm}$ is greater than $0.35\mu\text{Ci/gm}$. Condition A has two required actions, A.1 Verify Dose equivalent I-131 within the acceptable region of Tech Spec Figure 3.4.16-1 AND A.2 Restore Dose equivalent I-131 to within limit within 48 hours. On Tech Spec Figure 3.4.16-1 the Dose equivalent I-131 of $40\mu\text{Ci/gm}$ is NOT within the acceptable region. LCO 3.4.16 Condition C is also NOT met and the required action is to be in Mode 3 with T_{avg} less than $500\text{ }^{\circ}\text{F}$ within the next 6 hours. This was the answer key answer, choice B along with the correct bases. The intent of the question was to identify this required action.

However, IAW ITS section 1.3 "Completion Times" Pg 1.3-1 and Pg 1.3-11 (Attachments 78-3 and 78-4) when multiple conditions apply to a single LCO all action times must be tracked and monitored from time of discovery to meet said condition. Additionally, ITS Section 1.2 "Logical Connectors" page 1.2-1 (Attachment 78-5) states "both actions must be completed as long as the condition applies". Therefore LCO 3.4.16 Required Action A.2, Restore Dose equivalent I-131 to within limit within 48 hours is still a required action even though LCO 3.4.16 Condition C is more restrictive.

Restore Dose equivalent I-131 to within limit within 48 hours was choice D with the same bases as choice B.

Based on this information, the facility recommends accepting D as an alternate acceptable answer.

Attachment A Facility Comments for Question # 90

Comment:

The facility recommends deleting this question from the exam.

The initial power level for question 90 was 75% NSA. The question then asked the SRO applicants to prioritize several VALID annunciators that were simultaneously received. The applicants were asked to perform this prioritization IAW the guidance provided in 1/2OM-48, "Adherence and Familiarization to Operating Procedures". The annunciators listed in the choices were either yellow bordered, or no bordered. IAW the guidance provided in 1/2OM-48, "Adherence and Familiarization to Operating Procedures" paragraph E.2.c on page 12 (Attachment 90-1) the priority is:

1. First out annunciators
2. Red bordered annunciators
3. Yellow annunciators
4. No bordered annunciators

The answer key answer, choice B was annunciator A5-8C, "US SERV TRMR 2C OVERCURRENT GEN TRIP since this is a First Out annunciator. The intent of the question was to simply apply this procedural requirement to the stated situation.

However, if annunciator A5-8C, "US SERV TRMR 2C OVERCURRENT GEN TRIP is received, initiating device 251-206G is activated (Attachment 90-2). This will initiate a turbine trip (Attachment 90-3), which will initiate a reactor trip (Attachment 90-4) and the EOP network will be entered.

IAW the guidance provided in 1/2OM-48, "Adherence and Familiarization to Operating Procedures" paragraph E.1 on page 11 (Attachment 90-5) the EOPs take priority over Alarm Response Procedures (ARPs), and the ARPs are only to be reviewed as time permits. Asking applicants for the priority of yellow bordered, or no bordered Annunciators during EOP implementation is NOT a valid question since ARPs have no priority and are to be addressed only as time permits.

Based on this information, the facility recommends deleting this question from the exam.