

JPM Review Comments

RO ADMIN JPMS

1. RO-119-JP16A
 - a. What is the reference that describes how these calculations are performed?
2. RO-119-JP17A
 - a. Initial Conditions should specify job title/position to ensure clear understanding that work is covered work
 - b. Shouldn't performance steps refer to steps 3.1 through 3.4. Referenced steps are Responsibilities and not instruction steps.
 - c. Remove JPM Title from header of Turnover Sheet and Work History.
 - d. "Validation By" date is before "Developed By" date
3. RO(SO)-119-JP121
 - a. Performance steps should reflect/reference procedure guidance in OP-AA-200 (i.e., Tagging boundary requirements).
4. RO-119-JP231
 - a. Initiating Cue should state that the JPM is Time Critical
 - b. Time for completion is too long. Notification must be completed within 15 minutes of classification. The time needed by the SM to complete the NARS form must be subtracted from this 15 minute window. Time for completion should be on the order of 5 minutes.
 - c. Since applicant is not required to complete the NARS form the information in the initial conditions that is duplicated on the completed form can be removed from the Turnover. Information needs to simply state that a SAE was declared 10 minutes ago due to a LOCA, hand the applicant the form, and direct him/her to make the notification.
 - d. Replace JPM Performance steps 1 and 2 (and possibly 3; see next comment) with NOTE and renumber steps accordingly.
 - e. Is it the expectation that the communicator obtains Form EPIPF-AD-07-05, "State and County Notification," or would it be handed to the communicator with the NARS form.
 - f. Include Evaluator Note on step 9 to record time that State Warning Center answers roll call; should be same as time recorded on NARS form by applicant. Needed to ensure CRITICAL TIME limit is met.
 - g. Include a blank NARS form for the EVALUATOR to complete as applicant reads information. This will allow the EVALUATOR to capture any incorrect information for the read back.
 - h. Performance step 14 need only be that call to Kewaunee County Sheriff is initiated (and not the Manitowoc County Sheriff).
 - i. Change termination criteria to: call to Kewaunee County Sheriff initiated.

JPM Review Comments

SRO ADMIN JPMS

1. SO-119-JP03B
 - a. Recommend changing tank level reported in Performance Step 2 to a value that either shows no change or shows an increase but still is within 2% of initial value, delete the reference to not approving the permit (i.e., change Standard to “Approve”)
 - b. Is the applicant expected to sign for review regardless of whether they identify the tank error or not.
 - c. What actions (other than initiating a CR) would be required for discharging the tank with the OOS tank level?
2. SO-119-JP011
 - a. The second initiating cue is unnecessary. It should be implied by the assigned task.
 - b. Tank level information described in the Required Materials does not match what is recorded on mark-up.
 - c. Acceptance Criteria for Day Tank level is “greater than 5.5 ft.” This does match the range specified in Performance Step 1.
3. SO-119-JP311
 - a. “Validation By” date is before “Developed By” date
 - b. FAHDR needs to be redone. Temporary location looks like G12 (same as original desired location) instead of E12.
 - c. Add Evaluator Note to Performance Step 2 to consider a followup question on where an acceptable temporary storage location would be.
4. SO-119-JP05E
 - a. The bulleted item under the “Initiating Cue” should be incorporated into the initial conditions. After the applicant has had ample time to review the completed NARS form and marked up EPIP, and gain understanding of the initial conditions, the STA report should be the only initiating cue.
 - b. What is the added value by including the change in release status?

JPM Review Comments

CONTROL ROOM SYSTEMS JPMS

1. RO-E00-JP012
 - a. Performance of Attachment A will be performed by several applicants during the dynamic scenarios, with similar auto start failures.
 - b. This marginally represents an alternate path JPM but is too similar to the failures in the scenarios.
 - c. Suggest simply starting the JPM at the associated step in Attach A (i.e., ICS failed to auto start, start ICS, then insert some additional fault).
2. RO-049-JP01D – No Comments
3. RO-E00-JP011 – No Comments
4. RO-054-JP061E
 - a. “Validation By” date is before “Developed By” date
 - b. I don’t consider this an “alternate path” JPM since the operator is told as part of the initial conditions that Turbine Control is NOT in OPER AUTO
5. RO-018-JP011
 - a. Suggestion for improvement – simulate a spurious actuation where the initiating signal has cleared (e.g., testing error caused dampers to realign), then direct recovery to normal where damper failure then is discovered.
6. RO-039-JP02A – No Comments
7. RO-034-JP04A
 - a. This is an activity more suited for a dynamic scenario since a SRO would more than likely be directing the action step by step.
 - b. Replace JPM
8. RO-045-JP01A – No Comments

IN-PLANT SYSTEMS JPMS

1. AO-036-JP09A
 - a. A note to the EVALUATOR, located prior to the first performance step, explaining the abnormal lineup might be useful.
2. RO-E07-JP01H
 - a. The items listed in Step 4 Of AOP-FP-003, should be given/simulated given as part of the “Initiating Cue” rather than just simply stating that step 4 is completed.
3. AO-010-JP021
 - a. I don’t consider this an “alternate path” JPM since the initial conditions state that the EDG has failed to shut down by normal methods. The operator has been directed to perform the specific step.