

JPM#	1. Dyn (D/S)	2. LOD (1-5)	3. Attributes					4. Job Content Errors		5. U/E/S	6. Explanation (See below for instructions)
			IC Focus	Cues	Critical Steps	Scope (N/B)	Overlap	Job-Link	Minutia		
RO (A1)		2								E S	<p>The front page says that this is alternate path. Where is the alternate path?</p> <p>JPM was not very discriminating with only a few verifiable steps, Licensee agreed and replaced it.</p> <p>(GENERIC COMMENT – ALL ADMIN JPMS – The Task Standard format is not what is expected. It should state what the end state should be that the applicant completes (i.e., surveillance X is complete through Step Y per procedure Z, etc.). Need to discuss this structure with licensee related to NUREG-1021 expectations. References:</p> <ul style="list-style-type: none"> - NUREG-1021, ES-302, Section D.2.f (page 7 of 12) - NUREG-1021, Appendix C, Section B.3 (page 3 of 10) - 10 CFR 44.45(a) <p>Replacement JPM is SAT.</p>
RO (A2)		3								S	
RO (A3)		3								E S	<p>This JPM could cause a problem for exam security. How is this JPM implemented without leaving material that subsequent applicants could use to go the appropriate webpages (exam security on computer workstation)? Also, If this procedure change is related to whether or not Suppression Pool Cooling/RHR is lined up properly for service (Condition Adverse to Quality), Step 4.3.2 of 0.4IDOCs says to ensure that there is a CR number to enter. Is this in conflict with what is being evaluated here? Additionally, if the Priority for the request is automatically generated, how does he/she know if it is appropriate? What should it be for evaluation? Final question is that there are references in the JPM to procedures 0.4IDOCs and 4.1DOCS. Are these different, or is this a typo?</p> <p>Not Alternate Path and too few steps to be discriminating. Licensee replaced JPM due to these comments.</p> <p>Replacement JPM is SAT.</p>
RO (A4)		3								S	
SRO (A5)		3								E S	<p>It is assumed that other individuals can be called to fill these two positions from the call out list. Have the others been contacted? This is not clear in the initiating cue, and the applicant may elect to take this action instead of justifying whether or not two individuals that have recently consumed alcohol can report to site. This would be the conservative action, but it is not eliminated from contention in the cue.</p> <p>This JPM only has three verifiable steps in it also. Licensee replaced JPM due to comments discussed above. It is now SAT.</p>
SRO (A6)		3								S	
SRO (A7)		3								S	
SRO (A8)		3								E S	<p>The cue says that he/she needs to determine if he/she can approve access and work in the area. The applicant could NOT review the associated documentation, and still sign the form, designating that he/she can approve the entry. Therefore, it is questionable whether calling their review tasks critical steps, unless there is some written output that comes from those steps that is gradable.</p> <p>Four steps that involve only reviewing existing info with no changes and one signature step is not very</p>

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											discriminating. Licensee replaced JPM due to comments discussed above. It is now SAT.
SRO (A9)		3								S	

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1. Determine whether the task is dynamic (D) or static (S). A dynamic task is one that involves continuous monitoring and response to varying parameters. A static task is basically a system reconfiguration or realignment.
2. Determine level of difficulty (LOD) using established 1-5 rating scale. Levels 1 and 5 represent inappropriate (low or high) discriminatory level for the license being tested.
3. Check the appropriate box when an attribute weakness is identified:
 - The initiating cue is not sufficiently clear to ensure the operator understands the task and how to begin.
 - The JPM does not contain sufficient cues that are objective (not leading).
 - All critical steps (elements) have not been properly identified.
 - Scope of the task is either too narrow (N) or too broad (B).
 - Excessive overlap with other part of operating test or written examination.
4. Check the appropriate box when a job content error is identified:
 - Topics not linked to job content (e.g., disguised task, not required in real job).
 - Task is trivial and without safety significance.
5. Based on the reviewer=s judgment, is the JPM as written (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory?
6. Provide a brief description of any U or E rating in the explanation column.
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S1 (a)		3			X					U	<p>Procedure 2.4RR says in immediate action 3.3.2 that if recirc flow is lowering which would be expected with the recirc pump trip), the operator is supposed to push the SCOOP TUBE LOCKOUT button. Justify why this is not included in the JPM, and why it is not a <u>critical step</u>. Also, if it is consistent with the policy implicated in JPM e, immediate actions are expected to be performed from memory in order. If the operator doesn't meet this expectation, he/she doesn't meet a critical step/function.</p> <p>Questions:</p> <ol style="list-style-type: none"> 1) On Step 7, does the applicant actually operate the recirc pump motor generator field breaker? If he/she checks it to see if it is open, and it is open, then the operator has taken no positive observable action to evaluate. Hence, it cannot be a critical step. 2) Step 9 needs a cue to apply time compression for the 5 minute wait, unless this cannot be accommodated in the simulator. Need to discuss. 3) Why would the evaluator need to provide cues on the alarms and flows indicated when they are given by the simulator (Step 18)? <p>The form 301-2's for this JPM do not reflect that this is an Alternate Path JPM.</p> <p>(GENERIC COMMENT – ALL JPMS – The Task Standard format is not what is expected. It should state what the end state should be that the applicant completes (i.e., surveillance X is complete through Step Y per procedure Z, etc.). Need to discuss this structure with licensee related to NUREG-1021 expectations. References:</p> <ul style="list-style-type: none"> - NUREG-1021, ES-302, Section D.2.f (page 7 of 12) - NUREG-1021, Appendix C, Section B.3 (page 3 of 10) - 10 CFR 44.45(a)
										S	Licensee replaced JPM and it is now SAT.
S2 (b)		3								E	This JPM has been used extensively on audit and NRC exams so licensee replaced it.
										S	Replacement JPM is SAT.
S3 (c)		3								E	This JPM is essentially two steps and is not very discriminating. Licensee agreed and replaced.
										S	Replacement JPM is SAT.
S4 (d)		3			X					U	<p>What is the cooldown rate limit in place for this? 100F/hr, 80F/hr (some sites have as administrative limit), or other?</p> <p>The Hard Card has the operator push OK after entering the desired pressure and pressure reduction rate. This is not reflected in the JPM.</p> <p>Step 3.1 of the Manual BPV Control procedure on the Hard Card is not in the JPM. It</p>

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											<p>would also appear to be a <u>critical step</u> that is missing.</p> <p>For Step 12, is it possible for the operator to open the bypass valves enough to establish a cooldown rate greater than the limit? If so, what band of control determines if he/she performs this satisfactory or unsatisfactory?</p> <p>The form 301-2's for this JPM do not reflect that this is an Alternate Path JPM.</p> <p>S Licensee replaced this JPM and it is now SAT.</p>
S5 (e)		3								S	The form 301-2's for this JPM show it as an Alternate Path JPM, but there isn't one in the JPM itself. Done.
S6 (f)		3								S	The form 301-2's for this JPM, and the JPM's cover sheet, show it as an Alternate Path JPM. The Alternate Path appears to be between JPM steps 7 and 8. Mark this, if this is the case. Done.
S7 (g)		1							X	U	<p>On Step 3, the applicant could omit this check that the light is on, and it would still be without action. This is not a critical step.</p> <p>The JPM, as written, only involves the applicant operating one switch in order to complete it. This is not very discriminating in terms of an evaluating experience to judge their understanding or abilities with this system. It could be expanded so the applicant takes the actions to reset the half scram as well to make more of an evaluation tool.</p>
										S	Licensee replaced the JPM and it is now SAT.
S8 (h)		1			X				X	U	<p>This only has one valve operation, and it doesn't affect any change. That is the only demonstration of any physical operator ability, so that step has to be critical. It can be argued that this JPM is not a very discriminating tool as well. Subsequent actions in the cited procedure are redundant with the content of JPM f.</p>
										S	Licensee replaced the JPM and it is now SAT.
P1 (i)		4								E	<p>The DG JPM has been used too much on exams and is starting to become predictable. Recommend creating a new JPM for some of the new digital systems that have been recently installed at Cooper such as Digital Feed water or digital turbine screen interface issues such as the CPSES loss of touch screen controls that occurred in 2009.</p>
										S	Licensee agreed to replace with OPC server reboot JPM that is required when screens lose power for Reactor Feed Pump Control and Interface. Licensee created this JPM for this exam. This new JPM is SAT.
P2 (j)		3								S	Because of outage concerns (when exam was rescheduled due to poor performance on audit) with this equipment and its accessibility, the licensee requested a change to ensure accessibility during exam and we agreed.

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										S	Replacement JPM is SAT.
P3 (k)										S	

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CNS-2011-02										DRAFT OPERATING TEST COMMENTS	SCENARIOS
Scenario Set	1. ES	2. TS	3. Crit	4. IC	5. Pred	6. TL	7. L/C	8. Eff	9. U/E/S	10. Explanation (See below for instructions)	
1									E S	Event 6 is the same thing as JPM a. Per NUREG-1021, the content of the exam cannot be duplicated in other portions of the exam. Event 6 Replaced. Sat.	
2									E S	In Event 4, it says that a critical task is to reduce power when it exceeds the license limit. What is the plant's license limit thermal power? Another critical task is to start Suppression Pool Cooling when the SP temperature is greater than 95F. There has to be a threshold at which, if they don't start SP cooling, there would be detrimental effects. That is what the critical task needs to be written to per NUREG-1021. Licensee replaced both critical tasks so scenario is now Sat.	
3									E S	For the critical task on containment isolation failure, there has to be some parameter(s) that if exceeded, it would indicate that the task is failed per NUREG-1021. The way it is written, if they don't isolate Group 6 when it fails to close immediately, they fail. Licensee replaced this critical task and scenario is now Sat.	
4 (B/U)									E S	The critical task on the SW pump trip needs to tie the needed pump start to a point when a critical parameter (temperature, pressure) is exceeded. Same thought on the loss of RPV level indication with the critical task. Licensee replaced both critical tasks so scenario is now Sat.	

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1. ES: ES-301 checklists 4, 5, & 6 satisfied.
2. TS: Set includes SRO TS actions for each SRO, with required actions explicitly detailed.
3. Crit: Each manipulation or evolution has explicit success criteria documented in Form ES-D-2.
4. IC: Out of service equipment and other initial conditions reasonably consistent between scenarios and not predictive of scenario events and actions.
5. Pred: Scenario sequence and other factors avoid predictability issues.
6. TL: Time line constructed, including event and process triggered conditions, such that scenario can run without routine examiner cuing.
7. L/C: Length and complexity for each scenario in the set is reasonable for the crew mix being examined, such that all applicants have reasonably similar exposure and events are needed for evaluation purposes.
8. Eff: Sequence of events is reasonably efficient for examination purposes, especially with respect to long delays or interactions.

9. Based on the reviewer=s judgment, rate the scenario set as (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory.
10. Provide a brief description of problem in the explanation column.
11. Save initial review comments as normal black text; indicate how comments were resolved using **blue text** so that each JPM used on the exam is reflected by a (S)atisfactory resolution on this form.