

DRAFT OUTLINE COMMENTS

Facility: Comanche Peak

First Exam Date: June 11, 2012

Written Exam Outline (Revision d)	
Comment	Resolution
1	<p>Question 55: This was originally a K1 topic. In Revision “c,” it was changed to A1 for no justified reason, so the request was to change it back to a K1 topic. In Revision “d,” it is a K3 topic. The justification given is to provide skyscraper balance. If it is changed back to a K1 topic, that would achieve ultimate skyscraper balance, so I don’t understand this. Justify.</p> <p>Licensee: Revision ‘c’ change was part of the removal of duplication between SRO and RO examinations. New K/A was randomly selected as an A1 based on possible 057 K/As. Based on feedback from Revision ‘c’, K/A was requested to be a K, in particular a K1. A review of available Ks in 057 with an importance of greater than 2.5 yields only 057 AK3.01, thus it was selected. Response: Action is satisfactory.</p>
2	<p>Question 77: The K/A topic was reselected in Revision “c” after discussion. It was changed to another topic in Revision “d.” Explain the basis for re-selecting.</p> <p>Licensee: Following Revision ‘c’ it was identified that W/E11 was sampled twice Q#54 and Q#77 and that 038 had not been sampled. As a result Q#77 was replaced with a 038 question substituting EA2 for AA2. Response: Action is satisfactory.</p>

Administrative JPM Outline (Revision d)	
Comment	Resolution
1	<p>RA4 – The JPM is numbered RWT029. A JPM by this number was used in the June 2011 exam. The descriptions sound slightly different. Need to verify if this is a Modified or a Direct bank JPM so it is labeled correctly.</p> <p>Licensee: The “Task Number” (RWT029) is the same but it is a different JPM. It is a modified JPM from that in the JPM Bank. Because the JPM Bank is updated a “new” number is not assigned until after the exams are given. We will provide the original versions of all modified JPMs. Normally we will make the new JPM something like RWT029A. Response: Action is satisfactory.</p>
2	<p>SA3 – The JPM number is the same as one on the June 2011 exam, but the descriptions are different. Clarify.</p> <p>Licensee: The SRO “Task Number” is the same as SRO tasks are often broad based. This is how JPMs are numbered. It is a different JPM. The JPM number in the bank for this is RO4108 (as shown on RA3). It gets the SO1202 designation because it is a surveillance task with SRO requirements. This is all based on the global content of our SRO objectives. Response: Action is satisfactory.</p>

3	SA5 – Based on the description and JPM number, this is the same as a JPM in the June 2011 and April 2010 exams. The content may be different, but clarification is needed.	<p><u>Licensee:</u> As described for SA3 the SRO Task Number is the same SO1136, however the JPM is different as a new JPM for EAL Classification was developed. This is all based on the global content of our SRO objectives.</p> <p><u>Response:</u> Action is satisfactory.</p>
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Control Room / In-Plant System JPM Outline (Revision d)	
Comment	Resolution
1	<p>S-1, S-3, S-6; P-1 through P-3 – They say they are PRA significant actions. Do they have time or other parametric requirements? Need to know for evaluation criteria.</p> <p><u>Licensee:</u> S-1 Respond to a Dropped Rod - was incorrectly labeled as a PRA significant action. This designation will be removed.</p> <p><u>Response:</u> Action is satisfactory.</p> <p>S-3 Respond to Shutdown Loss of Coolant – is not categorized as a 30 minute or less Time Critical Action (TCA) and the JPM is validated at less than 30 minutes, thus no evaluation criteria.</p> <p><u>Response:</u> Observed during validation – set up in Mode 3, no additional actions.</p> <p>S-5 Transfer Containment Spray from Injection to Recirculation – Per OWI-214, Control of Time Critical Actions, this is TCA-1.9 and is procedurally validated at less than 1 minute and 10 seconds, however, the transfer is faulted and will require deviation from the TCA when the Train B sump to spray pump valve fails to open. As such the time validation for this activity cannot be compared to the validation time, thus no evaluation criteria only task evaluation criteria.</p> <p><u>Response:</u> The FSAR content was reviewed, and the JPM covers the content of TCA-1.9.</p> <p>S-6 Restore Safeguards Bus 1EA1 to Offsite Power – would be a PRA significant action if performed in response to a Loss of Offsite Power, however this JPM does not perform the restoration under these plant conditions. The PRA significant action designation will be removed.</p> <p><u>Response:</u> Justification is satisfactory.</p> <p>P-1 Alignment of Alternate AFW Supply from Station Service Water – is not categorized as a 30 minute or less Time Critical Action and the JPM is validated at less than 30 minutes, thus no evaluation criteria.</p> <p><u>Response:</u> Justification is satisfactory. No</p>

		<p>FSAR or Thermal/Hydraulic Analysis time less than 30 minutes.</p> <p>P-2 Perform Local Normal EDG Start - is not categorized as a 30 minute or less Time Critical Action as the EDG start validation is solely proper procedure performance, thus no evaluation criteria.</p> <p><u>Response:</u> Justification is satisfactory. No FSAR or Thermal/Hydraulic Analysis time less than 30 minutes.</p> <p>P-3 Align Emergency Makeup to the RWST - is not categorized as a 30 minute or less Time Critical Action and the JPM is validated at less than 30 minutes, thus no evaluation criteria.</p> <p><u>Response:</u> Justification is satisfactory.</p>
2	<p>P-2 – Based on the description, it is not clear how this EDG JPM is tied to Safety Function 8: Plant Service Systems. It would appear to be tied to Safety Function 6: Electrical.</p>	<p><u>Licensee:</u> In accordance with NUREG-1021 Form ES-401-2, 068 Control Room Evacuation is Safety Function 8. The action of Local Normal Start of the EDG is contained in these actions.</p> <p><u>Response:</u> Justification is satisfactory.</p>
3	<p>S-1 – Is this JPM a modified version or the same as S-1 in the June 2011 exam?</p>	<p><u>Licensee:</u> Originally recorded as RO1014B (Respond to a Dropped Rod) but should have been recorded as RO1014A (Perform a Dropped Rod Recovery). Corrected on ES-301-2, Rev. e. It is a modified JPM with the same “Task Number.” NRC 2011 S-1 starts at the beginning of ABN-712 (Respond to a Dropped Rod). NRC 2012 S-1 starts at Step 15 (Recover the Dropped Rod). The JPM will be given a separate JPM number when added to the JPM bank.</p> <p><u>Response:</u> No further actions needed.</p>
4	<p>P-3: This one could be associated with Safety Function 2 or 3. Discuss.</p>	<p><u>Licensee:</u> Safety Function 2 was selected as this is a Reactor Coolant System Inventory Control task as opposed to a Safety Function 3, Reactor Pressure Control task.</p> <p><u>Response:</u> Justification is satisfactory.</p>
5	<p>There are 10 effective Safety Functions to cover with the JPMs. This would mean all should be used with one used twice. Why are there no JPMs related to Safety Functions 3 and 9? In fact, there have been no JPMs in the past two years on Safety Function 9. Justify the approach to Safety Function coverage.</p>	<p><u>Licensee:</u> Originally S-3 was targeted for the JPM outline, however adequate coverage was deemed in the Sim Scenarios (Scenario #2, Event 1; Scenario #3, Event 3) and a dissimilar JPM to the scenarios was not identified.</p> <p>Safety Function 9 is covered in Written Exam Questions 37 & 71. Current Liquid Release JPMs have been used on recent exams and an alternative was not identified.</p> <p><u>Response:</u> One of the in-plant JPMs was</p>

	changed to address Safety Function 9.
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Simulator Scenario Outline Comments (Revision d)	
Comment	Resolution
1	<p>Scenario 4 is not accounted for in the ES-301-5. Correct.</p> <p><u>Licensee</u>: Yes that is correct. It is the currently selected spare scenario. Based on the feedback from the last two exams we did not include the spare scenario on the ES-301-5.</p> <p><u>Response</u>: Monitored during validation. Selected for the exam, so it will be added to the ES-301-5 forms.</p>
2	<p>Scenario 1 – Event 3 is Normal and an Instrument/Component failure at the same time on the ES-301-5. It can be counted only as one or the other per ES-301, Section D.5d.</p> <p><u>Licensee</u>: Event 3 is properly labeled as a Normal on Form ES-D-1. ES-301-5, Revision 'e' will correct the I/C for the SRO to 1,2,4 vice 1,2,3.</p> <p><u>Response</u>: Action is satisfactory.</p>
3	<p>Scenario 3 – Event 1 is a Component vice an Instrument failure (see D-1).</p> <p><u>Licensee</u>: Correct. This will be corrected on ES-D-1, Revision 'e' and Scenario # 3 Outline Revision 'e'.</p> <p><u>Response</u>: Action is satisfactory.</p>
4	<p>Scenario 3 – Does Event 9 have a verifiable action to give the applicants credit for? There is no Event Type assigned to it on the D-1.</p> <p><u>Licensee</u>: The purpose of Event 9 is to ensure that the operator must take actions to complete the critical task of SG isolation. If this event were not included, the possibility exists that an automatic signal could complete a portion of the critical task. No verifiable action is anticipated.</p> <p><u>Response</u>: Scenario reviewed during validation. Comments incorporated.</p>