

NRC ILE Operating Test Submittal Comments

Dresden Nuclear Power Station, Units 2 and 3

Operating Test

Exam Date Weeks of 08/06 and 13/2012

	Chief Examiner Comment	Facility Action/Response
Operating Test JPMs		
RO Admin JPMs		
A-N-1-R	<ol style="list-style-type: none"> 1) Initial Conditions, Line 4; replace “they” with “he”. 2) Initial Conditions, Line 7; Sentence as written does not make sense. Consider revising sentence into two statements; one to state that individual was on vacation and second one introducing the work hours table. 3) Revise NOTE to provide procedure when requested/located. 4) A more operationally valid cue for JPM Step 1 might be to ask the applicant what requirements must be satisfied to allow him to work the extra hours with the standard for job step 2 revised accordingly. 5) Fix step numbers on the cue sheet. 6) 15 min seems like long time to apply work hour rules. Is 10 minutes more reasonable? 	<ol style="list-style-type: none"> 1) Left as is. 2) Sentence revised to clear up the working hour status. 3) Note revised as suggested. 4) Cue revised as suggested. 5) Fixed 6) Left as is. Facility indicated time is based on numerous validations/performances of JPM.

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A-N-2-R	<ol style="list-style-type: none"> 1) Delete "...broken arm and leg." (possibly replace with a statement that the individual is in lot of pain) and "He is not contaminated" from Initiating Cue. Applicant should be verifying conditions (ie, extent of injuries and contamination) based on procedure. 2) Replace initiating Cue #3 with appropriate cues within JPM body. 3) Add note to evaluator that applicant may call 911 on a dedicated outside phone line. 4) Add pickup location to standard 5) Revise standard for step 5 to include with "...and makes the specified requests." 6) What is the validated (time estimate) for completion? 	<ol style="list-style-type: none"> 1) Change made as requested. 2) Changed as suggested. 3) Change made (JPM step 3). Additionally specific extension numbers replaced with: "appropriate number from station directory." 4) Added (JPM step 3) 5) Standard revised to include the specific actions that must be requested for satisfactory completion. 6) Validated completion time added.
A-N-3-R	<ol style="list-style-type: none"> 1) "Perform Off-Site Power Sources Available" used on 2011 RO admin JPM exam. The 2011 RO admin JPM is identical to the 2012 RO admin JPM except one listed under 2.1.31 (Conduct of Ops), and one listed under 2.2.37 (Equipment Control). 2) 20 min seems like long time to complete verification of several breaker positions and check bus voltages. Is 10 minutes more reasonable? 3) Does applicant have to receive Initial Cue of where to find the correct Attachment to use? 4) Cue for JPM Step 8 at bottom of previous page, put at top of the following page with associated JPM Step 8. 	<ol style="list-style-type: none"> 1) ES-301-1 allows a repeat of one admin JPM from the previous 2 exams. 2) Left as is. Facility indicated time is based on numerous validations/performances of JPM. 3) This is the expected order from the US. No change made to cue. 4) JPM Step 8 revised with expectation that voltage will obtained using computer point and cue for field reading deleted.

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A-N-4-R	<ol style="list-style-type: none"> 1) What is the validated (time estimate) for completion? 2) Revise INITIATING CUE to direct the applicant to determine the radiological controls needed to investigate the leakage on the RWCU Recirc Pump Suction Valve. 3) JPM Step 1; Is it wrong to use Zone 3 garments (full hood, wrist cuffs)? 4) Add cue before JPM Step 2 to query the applicant on items discussed during the brief. 	<ol style="list-style-type: none"> 1) Validated completion time added. 2) Change made as suggested. 3) Added the word "minimum" to standard. 4) Cue was not added, but remains an option available to examiner.
SRO Admin JPMs		
A-N-1-S	<ol style="list-style-type: none"> 1) JPM Note at top of page, only provide copy of SY-AA-101-132 to applicant because it is the only reference given in the Initiating Cue. He should need to locate/ask for the DOAs if needed. 2) Add NOTES to query the applicant if necessary to provide justification for their assessment. 3) Assessments are somewhat subjective. If applicant assesses threat as NON-CREDIBLE or CREDIBLE/ACTUAL initially, is that considered an unsatisfactory critical step? 4) What actions in DOA 0010-18? Identify specific standard(s) to be satisfied from DOA 0010-18, D.4 	<ol style="list-style-type: none"> 1) Call Jeff 2) Reevaluated as unnecessary. Always an option available to examiner. 3) Expected detonation time in Initial Conditions revised to eliminate concern. 4) Revised to state "all" actions are required to be identified.

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A-N-2-S	<ol style="list-style-type: none"> 1) Delete INITIAL CONDITIONS 2 through 5. 2, 3, and 5 are provided in the provided Attachment 1. Condition 4 should be provided as a verbal cue when requested/needed. 2) Revise Initiating Cue to read: "Complete the applicable portions of the Fire Protection Impairment Permit." Provide a Cue prior to JPM step 5 to Initiate the required fire-watch if not initiated by the applicant. 3) Add NOTE prior to JPM step 7 to query applicant as needed to provide justification for decision on Comp Measures. 4) Add NOTE prior to JPM Step 1 that number may be entered during completion of Section II of Impairment Permit (step 4.4.1.2.G of procedure). 5) Where is guidance for determining the need for Comp Measures or the need to notify NEIL? 6) Why are JPM Steps 2, 3, 11, 16, 21, 22, 23, and 27 not critical? 	<ol style="list-style-type: none"> 1) Condition 4 was moved. All others left as is. 2) Initiating Cue revised as suggested. Step 5 cue determined to be unnecessary. 3) Reevaluated as unnecessary. Always an option available to examiner. 4) Added 5) NEIL notification not required since impairment not expected to last more than 48 hours. 6) Determined not to be critical since information is obtained elsewhere during performance and copied to appropriate blocks.
A-N-3-S	<ol style="list-style-type: none"> 1) "Review Calculated DW Leakage and Identify TSs" used on 2011 SRO exam. 2011 and 2012 SRO admin JPMs essentially the same, different numbers. 2) Standard for JPM Step 4 TS action specifies both Condition A and B, but previous version referenced only Condition A. 	<ol style="list-style-type: none"> 1) ES-301-1 allows a repeat of one admin JPM from the previous 2 exams. Need to update ES-301-1 to indicate repeat from previous exam. 2) Standard corrected to specify only Condition A

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A-N-5-S	<ol style="list-style-type: none"> 1) Can anything be added to make this less simplistic? 2) Validated time of 15 minutes is not realistic. Would expect something more around 5 minutes. 3) Is this action consistent with the notification requirements of DOA 0010-18 	<ol style="list-style-type: none"> 1) Evaluated with no changes made. 2) Left as is. Facility indicated time is based on numerous validations/performances of JPM. 3) Evaluated as acceptable. No change
Simulator JPMs		
S-N-a	<ol style="list-style-type: none"> 1) Add a JPM step after JPM Step 7 to include verification of flow light status. 2) Revise ES 301-2 to reflect modified JPM 	<ol style="list-style-type: none"> 1) Step is not included in procedure so it was not changed. 2) JPM was not modified from last use.
S-N-b	<ol style="list-style-type: none"> 1) Is it necessary to direct the applicant to the specific procedure paragraph in the Initiating Cue? If not, delete that direction, let applicant identify. 	<ol style="list-style-type: none"> 1) Step/paragraph reference removed.
S-N-c	<ol style="list-style-type: none"> 1) Is it necessary to direct the applicant to the specific procedure paragraph in the Initiating Cue? If not, delete that direction, let applicant identify. 2) JPM step 1 should have already been completed if US is directing restoration. Include in Initial Conditions. 	<ol style="list-style-type: none"> 1) Left as is. 2) Moved to Initiating Cue.
S-N-d	<ol style="list-style-type: none"> 1) Is it necessary to direct the applicant to the specific procedure paragraph in the Initiating Cue? If not, delete that direction, let applicant identify. 2) NOTE should be place before JPM step 5 not after. 3) Should JPM Step 6 be critical? 4) Should JPM Step 10 be critical? 	<ol style="list-style-type: none"> 1) Left as is. 2) Note moved. 3) Reevaluated as non-critical 4) Reevaluated as non-critical; unnecessary to stop pump.

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S-N-e	<ol style="list-style-type: none"> 1) Should JPM Step 4 be critical? 2) Validated time of 16 minutes seems long, would expect something more around 10 minutes. 	<ol style="list-style-type: none"> 1) Changed to a Critical Step 2) Left as is. Facility indicated time is based on numerous validations/performances of JPM.
S-N-f	<ol style="list-style-type: none"> 1) "EDG-Perform Surveillance Testing, With Scram" is essentially same as 2010 JPM. 2) Delete direction to review Sections F and G from the Initiating Cue (Ops expectation for operators to review limits and precautions). 3) Why is this alternate path? It seems this could just as easily been initiated before commencing a load reduction. 4) Why is JPM complete if EDG is not shutdown? 	<ol style="list-style-type: none"> 1) ES-301-2 allows a repeat of 3 JPMS from the previous 2 exams. 2) Removed from cue. 3) Task is a response to an abnormal condition during the assigned task. 4) To continue would not add value to evaluation. 5) Added tolerances to standard for frequency and voltage adjustments.
S-N-g	<ol style="list-style-type: none"> 1) Is this alternate path? What is the "alternate path"? 2) Initial Condition #2 and Initiating Cue #1 on applicant cue sheet do not match initial condition and Initiating Cue listed on page 4 3) Surveillance activity (I.9 through I,12) should be completed 	<ol style="list-style-type: none"> 1) Response to unexpected condition (failure of status light to re-energize; alternate path is to bypass IRM channel due to inoperability. 2) Fixed 3) Evaluated as unnecessary to task evaluation. 4) Revised standards in JPM steps 3 and 6 to reflect that two actions are required (select and drive)
S-N-h	<ol style="list-style-type: none"> 1) Typo in equipment ID number in JPM step 27 	<ol style="list-style-type: none"> 1) corrected

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Inplant JPMs		
S-N-i	1) Is it necessary to direct the applicant to the specific procedure paragraph in the Initiating Cue? If not, delete that part of direction, let applicant identify. 2) JPM Step 5 critical?	1) Step number deleted 2) Changed to critical 3) Revised JPM step 6 from "...tasks..." to "...in-plant actions are..."
S-N-j	1) Is it necessary to direct the applicant to the specific procedure attachment in the Initiating Cue? If not, delete that part of direction, let applicant identify.	1) OK as is. 2) Added cue for engine RPM (for step JPM step 2)
S-N-k	1) Is it necessary to direct the applicant to the specific procedure step in the Initiating Cue? If not, delete that part of direction, let applicant identify. 2) Is 1 st cue necessary? Can't this be verified locally? Make them earn the information.	No changes were made.

OPERATING TEST SCENARIOS

Overall comment: No electrical bus failures that require manipulation of power sources....

Scenario 1		Scenario will be replaced with the previously identified "Spare" scenario.
Event 2, C	1) Minimal actions for BOP, but there are at least two required steps.	Meets minimum requirements.
Event 3, C, TS	1) Minimal actions for BOP, but there are at least two required steps. There does not appear to be any required manipulations; no credit for component failure.	Acceptable as a TS event for SRO, but insufficient to credit as a component malfunction for the BOP (only one verifiable action with no significant consequence if not performed).
Event 4, C	1) Minimal actions for ATC	Meets requirements. Add Flow Control Valve manipulation to list of ATC actions.

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Event 5, I, TS	2) Note: TS allows 12 hrs to put channel in trip.	Acceptable as a TS event for SRO, but only one verifiable action for ATC (manually insert ½ scram) but with no apparent consequence since scram functionality maintained.
Event 6, C	1) Minimal actions for BOP, only 1 required step (start 2B CW pump). Would not consider this an adequate C for BOP as written.	
Event 7, M	1) Insert relevant vacuum numbers, ie, trips...	Will be inserted.
Scenario 2		
Event 1, N	1) Minimal actions for BOP, but there are at least two required steps. 2) Appears the BOP stops fan, then starts other fan in lieu of CRS procedural direction to start fan, then stop other fan. Which is correct method?	2) CRS direction not procedural direction but order to simply swap fans.
Event 3, C	1) Minimal actions for ATC, but there are at least two required steps.	
Event 4, C	1) Does HPCI remain available? Is there any chance that the crew would isolate HPCI at this point? 2) Reword field report on Turning Gear status to indicate that it is prevented from engaging.	1) HPCI remains available but inop. It is not anticipated that crew would isolate HPCI. 2) Revised to state that TG appears to be binding and not engaging.
Scenario 3		
Event 2, C	1) Will crew continue to operate with CRD controller in MANUAL? 2) Basically, operator responds by putting controller in MANUAL, then restores parameters. Sufficient for C?	1) Yes 2) Operator must take manual control and return system parameters to normal.
Event 3, C, TS	1) Clarify that operator actions will stop the leak, otherwise, it would not matter what actions operator takes because leak would not stop.	NOTE at beginning of event indicates that leak is slow enough that TS limit is not expected to be reached. Role play provides feedback that leak slows to a trickle (consistent with draining of pipe) after shutting pump suction valve and that operator will continue to monitor to ensure that leak is isolated.

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Events 5&6	<ol style="list-style-type: none"> 1) This can only be counted as one Major Event 2) There is no substantive EOP actions. The operators simply pass through DEOP 100 on the way to DEOP 400-5 <ol style="list-style-type: none"> a. With minimum steam flow, RPV level may not drop below RPV L3 and with power <6%, there may not be any entry conditions for DEOP 100. b. DGP 2-03 directs entry into DEOP 100, but still no substantive actions are required. 	<p>Will be counted as only one Major Event.</p> <ol style="list-style-type: none"> a. RPV level does drop due to loss of all feed (initiating event) b. EOP actions (restore RPV level and stabilize RPV pressure) occur after control rods are inserted and ATWS contingency is exited.
Scenario 4		This scenario is now Scenario 1.
Event 1, C	<ol style="list-style-type: none"> 1) Restructure so the initiating cue is the TBCCW Press Lo alarm rather than the field report. Retain field report as follow-up to dispatch of field operator to investigate. 	<ol style="list-style-type: none"> 1) Revised as suggested.
Event 2, C	<ol style="list-style-type: none"> 1) Typo in equipment number in last bullet of Role Play. 	<ol style="list-style-type: none"> 1) Typo corrected.
Event 3, I (will become Event 6)	<ol style="list-style-type: none"> 1) Due to potential for premature SCRAM, move event to after MPT malfunction (event 6) 	<ol style="list-style-type: none"> 1) Event was moved prior to validation run.
Event 6, C (will become Event 5)	<ol style="list-style-type: none"> 1) Provide ability to manually actuate Trigger 13 at evaluators discretion if load drop drags out. 	<ol style="list-style-type: none"> 1) Added.