

RATING FACTOR 3.A.: CONTROL BOARD OPERATIONS, LOCATE & MANIPULATE

1. Examiner comment on 303 form p. 18 of 32, related to Scenario 7, Event 1

A. FACTUAL SEQUENCE OF EVENTS

- -During the simulator scenario, the initial event (a normal evolution) directed the operators to raise reactor power.
- -At time 07:26:?? directed Carla to maintain Tave-to-Tref within ±2 degrees F and AFD within ± 3 AFD units.
- -At time 07:28:40, Carla, as Reactor Operator (RO), moved control bank 'D' rods out 2.5 steps (ending with 'D' bank at 157 steps on both groups)
- -At time 07:32:10, as Senior Reactor Operator (SRO) directed a 8-12 MWe turbine load increase.
- -At time 07:36:50, Carla, as Reactor Operator (RO), moved control bank 'D' rods out 3 steps (ending with 'D' bank at 160 steps on both groups)
- -At time 07:39:48, as Senior Reactor Operator (SRO) directed a 8-12 MWe turbine load increase.
- -At time 07:43:57, event 2 was initiated, a #4 SG steam flow channel failing high. At this time Tave-to-Tref deviation was -0.566 °F.
- -During event 2, there was no additional rod motion, and no examiner has any record of a communication between the RO and SRO regarding temperature control.
- -At time 07:54:54, event 3 was initiated, where TE-0130 fails low. At this time, Tave-to-Tref deviation was -1.156 °F.
- -During the operator actions for event 3, the entire team of applicants was physically located in front of the control panel with the controller for TE-0130. The NRC exam team noted that Carla was standing in front of the TE-0130 controller throughout event 3. P. Capehart and M. Bates conducted a short discussion questioning the allowable duration of time for the OATC position to be away from monitoring the key reactor plant parameters. P. Capehart also noted that Carla was not monitoring reactor coolant temperature trends via the IPC computer trend screen.
- -During event 3, there was no additional rod motion, and no examiner has any record of a communication between the RO and SRO regarding temperature control.
- -At time 08:11:20, event 4 was initiated, which was a trip of an NSCW cooling fan, a malfunction which contained no operator actions for the control board personnel. At this time, Tave-to-Tref deviation was -1.481 °F.



-At approximately time 08:18 Carla began what was intended as a 3-step outward rod pull. Rods were only moved by 1 step due to initiating event 5. -At time 08:18:02 event 5 was initiated, where pressurizer pressure channel PI-456 failed high.

-At time 08:18:17, Carla released the in-hold-out switch and informed of the pressurizer pressure malfunction.

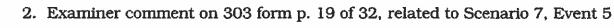
-At time 08:37:??, Carla moved rods out 3 steps. Just before the rod move, Tave-to-Tref deviation was -2.297 °F. Tave-to-Tref was outside the established control band for approximately 4.8 minutes.

During post-scenario follow-up questions, the examiner asked Carla "what was your temperature control band?" Carla answered that it was plus or minus 2 degrees. The examiner asked Carla what the maximum Tave-to-Tref difference had been during the scenario. Carla responded that the maximum difference had been 2.3 degrees F.

B. EXAMINER EVALUATION AND COMMENTS

The examiner determined that the root cause deficiency was a result of poor control board operations. NUREG 1021, Appendix D 2.c. states for the competency *Operate the Control Boards* that "This competency involves the ability to *locate* and *manipulate* controls to attain a desired plant and system response or condition." ES-303 form ES-303-4 further specifies that the 3.a. rating factor determines if "...the applicant LOCATE AND MANIPULATE CONTROLS in an accurate and timely manner." For this event, Carla, as a control board operator, failed to manipulate the controls in a timely fashion to obtain the desired system response of maintaining Tave-to-Tref deviation between the ordered 2 degree band. Based on post-scenario follow-up questions, there was no deficiency in understanding; furthermore, there was no element of taking manual control of automatic functions because rods were in manual from the initiation of the scenario. Vogtle does not operate with automatic rod withdrawal capabilities, only automatic rod insertion.

There is a further element of poor communications during this event. There is no record from any NRC examiner of any communications during an approximate 40 minute period of time where Carla notified the SRO of the Tave-to-Tref value and trend. This is a clear example of a deficiency in rating factor 4.b., "Did the applicant keep crew members ... informed of plant status?"



A. FACTUAL SEQUENCE OF EVENTS

- -At approximately time 08:18 Carla, as Reactor Operator (RO) began what was intended as a 3-step outward rod pull. Rods were only moved by 1 step due to initiating event 5.
- -At time 08:18:02 event 5 was initiated, where pressurizer pressure channel PI-456 failed high.
- -PI-456 failing high caused pressurizer PORV 456 to OPEN. As part of the scenario design, the PORV block valve, HV-8000B, automatic closure feature on low pressurizer pressure was disabled.
- -At time 08:18:17, Carla released the in-hold-out switch and informed of the pressurizer pressure malfunction.
- -As part of immediate operator actions, Carla verified the pressurizer spray valves were closed, and then mis-operated the pressurizer PORV 456 handswitch by taking it to the OPEN position.
- -Carla then turned to look at without taking further actions.
 pointed at the PORV handswitch, and loudly stated: "Carla, shut that valve!"
- -Carla then correctly closed the PORV using the handswitch on the control board.

During post-scenario follow-up questions, the examiner asked Carla "what were your immediate operator actions?" Carla correctly stated the immediate operator actions for a pressurizer channel failure. During her statement, Carla indicated that she had initially turned the PORV handswitch in the wrong direction.

B. EXAMINER EVALUATION AND COMMENTS

During the review of Carla Smith's 303 documentation following the issuance of the exam report, the exam team identified that this event had been mis-graded, because it was a failed critical task.

In accordance with NUREG 1021, Appendix D, D.1.a states that a critical task in a simulator scenario must have safety significance:

In reviewing each proposed CT, assess the task to ensure that it is essential to safety. A task is essential to safety if its improper

performance or omission by an operator will result in direct adverse consequences or significant degradation in the mitigative capability of the plant.

If an automatically actuated plant system would have been required to mitigate the consequences of an individual's incorrect performance, or the performance necessitates the crew taking compensatory action that would complicate the event mitigation strategy, the task is safety significant.

Examples of CTs involving essential safety actions include those for which operation or correct performance prevents the following:

· degradation of any barrier to fission product release

Because the automatic closure of the PORV block valve had been defeated, manual action was required to prevent breaching a fission product barrier (*i.e.*, the Reactor Coolant System via the PORV, essentially creating a small-break LOCA).

NUREG 1021 Appendix E, Part E 4. gives clear guidance as to how the examiners are required to grade the applicant if an error that the applicant makes is corrected by a team member:

4. If you recognize, but fail to correct, an erroneous decision, response, answer, analysis, action, or interpretation made by the operating team or crew, the examiner may conclude that you agree with the incorrect item.

Members of the operating team or crew (whether applicants or surrogates) should perform peer checks in accordance with the facility licensee's procedures and practices; non-crew members and NRC examiners will not perform this function. However, if you begin to make an error that is corrected by a peer checker, you will be held accountable for the consequences of the potential error without regard to mitigation by the crew.

Therefore, because Carla had to be corrected by a crew member to close the PORV, she should have been held accountable for the consequences of the potential error, which entails failure of a critical task. During the analysis of her grading, this should be considered an error related to a critical task, further reinforcing the rating factor of "1" assigned for 3.a. Furthermore, in her cover letter to the appeal, Carla contended that none of her errors were related to a critical task or critical step. In light of this additional consideration, the NRC examiners believe that the applicant's contention is not correct.



Op-Test No.: 2012-301

Scenario No.: 7

Event No.: 1

Event Description: Reactor Power Ascension from 29% RTP and higher, UOP 12004-C, step 4.1.41 is

the next plateau.

Time	Position	Applicant's Action or Behavior	
	OATC	Uses 13009-1, "CVCS Reactor Makeup Control System" Section 4.7 "Frequent Dilutions While Controlling Reactor Power", as necessary to maintain Tavg matched with Tref during power ascension.	
	UO	Increases turbine load in increments of 15 Mwe to 30 Mwe using load increase pushbutton at direction of OATC. Monitors Generator Output.	
		13009-1, Section 4.7:	
		NOTES	
		This section can be used during power changes when necessary to frequently dilute the RCS for temperature control. The use of this section shall be authorized by the SS.	
		Frequent dilutions can raise VCT level to the point where VCT pressure reaches 40 psig. 1-LIC-0185 may be adjusted to allow divert to the RHT at a lower level to limit VCT pressure increase.	
	OATC	4.7 FREQUENT DILUTIONS WHILE CONTROLLING REACTOR POWER 4.7.1 Determine the amount of Reactor Makeup Water necessary to accomplish the power change or accommodate the expected impact of Xenon. (Uses Reactivity Briefing Sheet to Determine # gallons - Dilution) Gals H ₂ O	
		NOTE: EACH OATC WILL USE NUMBER HE/SHE IS COMFORTABLE WITH. (100-1000 Gallons)	
	OATC	4.7.2 Verify the Reactor Makeup System is aligned for automatic operation.	
	OATC	4.7.3 Start one Reactor Makeup Water Pump:	
		RX MU WTR PMP-1 1-HS-7762	
		RX MU WTR PMP-2 1-HS-7763	



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0724(28) team has the shift 27(19) ANE/REF 563.63/563.27 28(40) rods 1 2.5 steps ('1' 157) raise turbins load 8-12 MWe 36(50) mod 7 3 steps ('D' 160) (563.88/563.4) 39(48) raise turbine load 8-12 MWE AVE / REF 564.765 / 563.43

Appendix D	Required Operator Actions	Form ES-D-2

Op-Test No.: 2012-301

Scenario No.: 7

Event No.: 1

Event Description: Reactor Power Ascension from 29% RTP and higher, UOP 12004-C, step 4.1.41 is the next plateau.

Time	Position	Applicant's Action or Behavior
	OATC	4.7.4 Place VCT MAKEUP CONTROL 1-HS-40001B in STOP.
	OATC	4.7.5 As directed by the SS, place VCT MAKEUP MODE SELECT 1-HS-40001A in either the ALT DIL or DIL position.
	OATC	4.7.6 As directed by the SS, lower pot setting on 1-LIC-0185, to limit VCT pressure increase.
		Initial Pof Setting: New Pot Setting:
Vi.	OATC	4.7.7 Set TOTAL MAKEUP Integrator 1-FQI-0111 for the desired amount of Reactor M/U Water. Gals H ₂ O
	OATC	NOTE If VCT MAKEUP MODE SELECT 1-HS-40001A was placed in the DIL position in Step 4.7.5, Step 4.7.8 may be marked N/A.
		4.7.8 If required, close 1-FV-0110B as necessary to raise or maintain RCS hydrogen concentration. (N/A) Note to examiner: If ALT DIL selected, FV-110B will be closed.
	SS/OATC	4.7.9 At SS direction, dilution flow may be adjusted to desired flow using 1-FIC-0111. (record in AUTO LOG).
		Initial Pot Setting: New Pot Setting: NOTE: EXPECTED NOT TO CHANGE DESIRED FLOW:
	OATC	4.7.10 Place VCT MAKEUP CONTROL 1-HS-40001B in START and verify flow is indicated on 1-FI-0110B.







Op-Test No.: <u>2012-301</u> Scenario No.: 7

Event No.: 1

Event Description: Reactor Power Ascension from 29% RTP and higher, UOP 12004-C, step 4.1.41 is

the next plateau.

Time	Position	Applicant's Action or Behavior	
	OATC	4.7.11 WHEN TOTAL MAKEUP Integrator 1-FQI-0111 reaches its setpoint, verify dilution stops and the following valves close: 1-FV-0111A RX MU WTR TO BA BLENDER 1-FV-0111B BLENDER OUTLET TO VCT 1-FV-0110B BLENDER OUTLET TO CHARGING PUMPS SUCT	
	OATC	4.7.12 Operate the Pressurizer Back-up Heaters as necessary to equalize Cb between the RCS and the Pressurizer.	
	OATC	4.7.13 Monitor RCS temperature, Control Bank position, or power levels as applicable.	
	OATC	If frequent dilutions are to be continued past the end of the shift, step 4.7.14 should be marked N/A and this section completed to include realignment to the normal configuration. The new on coming shift can then initiate the section from the beginning to continue frequent dilution. 4.7.14 Repeat Steps 4.7.10 through 4.7.13 as necessary to continue power ramp and/or compensate for Xenon. NOTE: OATC WILL LEAVE CVCS MAKEUP SYSTEM ALIGNED PER 4.7 FOR FREQUENT DILUTIONS WHILE CONTROLLING REACTOR POWER DURING POWER ASCENSION.	







Op-Test No.: <u>2012-301</u>

Scenario No.: 7

Event No.: 1

Event Description: Reactor Power Ascension from 29% RTP and higher, UOP 12004-C, step 4.1.41 is

the next plateau.

Time	Position	Applicant's Action or Behavior	
	**	NOTE: EVENT 2 IS INITIATED WHILE OATC AND UO ARE PERFORMING ACTIONS IN EVENT 2 FOR POWER ASCENSION AT EXAMINERS DISCRETION.	







Appendix D	Required Operator Actions	Form ES-D-2

Op-Test No.: 2012-301 Scenario No.: 7

Event No.: 2

Event Description: SG # 4 Steam Flow channel Fi-542 fails high.

Time	Position	Applicant's Action or Behavior	
	UO	Diagnose SG Loop # 4 Flow FI-542 has failed high. Symptoms / alarms: ALB13-D01 STM GEN 4 FLOW MISMATCH Indications: • FI-542 reading off scale high. • Steam flow indication on FI-542 reading higher than feed flow.	
45(16)	UO	IMMEDIATE OPERATOR ACTIONS G1. Check steam and feed flows – MATCHED ON ALL SGs. (NO) RNO G1. Take manual control of the following as necessary to restore NR level between 60% and 70%. • Affected SG feed flow valves. (UO throttles closed loop 4 MFRV) • MFP(s) speed. (reduces MFPT speed using the Master Controller) Note to examiners: It is expected the operator will take manual control of MFRV # 4 and the MFPT Master Controller. Steam flow failing high will result in the MFRV # 4 opening and the MFPT Master Controller speeding up the feed pumps. The operator will control SG # 4 levels and MFP speed with these controllers.	
	ss	Enters AOP 18001-C, SYSTEMS INSTRUMENTATION MALFUNCTION, section G for FAILURE OF STEAM GENERATOR FLOW INSTRUMENTATION.	





Appendix D Required Operator Actions

Form ES-D-2

Op-Test No.: 2012-301

Scenario No.: 7

Event No.: 5

Event Description: PRZR pressure channel PI-456 will fail high with the PORB Block Valve HV-8000B failing to close in automatic on low RCS pressure of 2185 psig. The OATC will be required to manually close PORV 456 or HV-8000B to prevent a Reactor trip.

Time	Position	Applicant's Action or Behavior	
	SS	C15. Trip the affected channel bistables and place the associated MASTER TEST switches in TEST position per TABLE C1 within 72 hours (TS 3.3.1 & 3.3.2) NOTE: SS expected to leave bistables untripped during allowed out of service time to facilitate troubleshooting by I&C.	
	SS	C16. Initiate the applicable actions of:	
		TS 3.3.1 Reactor Trip	
المريدة	Vid J	Function Condition 6 ΟΤΔΤ Ε 8a Low PRZR pressure M 8b High PRZR pressure E	
gring		• TS 3.3.2 ESFAS	
ng ng	brown from	Function Condition 1d SI low PRZR pressure D 8b P-11 Interlock L (one hour action)	
		TS 3.4.1.a DNB RCS pressure < 2199 psig B (Momentary)	
Valve HV-8000B which did not clo Spec requirement for the Block Va		Note to examiner: The SS may look at Tech Specs for the Block Valve HV-8000B which did not close in automatic. There is no Tech Spec requirement for the Block Valve to work in automatic. Manual operation only is required per Tech Spec Bases of 3.4.11.	



0837 755 directed SPRANS -> auto p839 "call that block value in open"
during brief (3.4.11 what conditions) 47(20) and of brief (562.517/563.667)
48(20) rods 13 steps (... (D' 170) 52(30) rods 7 3 steps Ave (REF / 563.6 / 563.7 AFA: 20.7/0.8 target: -0.5

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Appendix D	Required Operator Actions	Form ES-D-2

Op-Test No.: 2012-301 Scenario No.: 7

Event No.: 5

Event Description: PRZR pressure channel PI-456 will fail high with the PORB Block Valve HV-8000B failing to close in automatic on low RCS pressure of 2185 psig. The OATC will be required to manually close PORV 456 or HV-8000B to prevent a Reactor trip.

Time	Position	Applicant's Action or Behavior		
	SS	C17. Check repairs and surveillances - COMPLETE.		
		RNO:		
		C17. Perform the following:		
		a. WHEN repairs and surveillances are complete, THEN perform step C18.		
		b. Return to procedure and step in effect.		
		END OF EVENT 5, proceed to EVENT 6.		





They correctly discussed DO managements Cum takes shift 5-c: 12 Steps 27:48 C-I's we have trup to see can low tenhing loss (missale) J-12: 78-12 Male 32:10 J-C: 435typs 30: 22 2 43: 47 Takes manual central of MFRV& Rup P.J: Failed Stan Flow Int 44124 P-J' BOA'S done IP: MIP Speed Control enterned to auto R-J-R: Place NIFRU#4 to auto. C5: UD Demi Wint & High 40 Temp C-T: TE-130 " antail, appears that Carla much court diagnosts" 3 running the ARP. Carlo did not spen any ARPs. 08 00 30 C-S' The only thing we can do is contact 47 to get TE fixed. 02:45 5-C: Take manual contral of TIC and municipy VCT Cutty J-C: That raises & lavers true it does not open & dos value. (The centrally is reverse acting & she did not know how to operate 11.) (and octually set it at 51%. 1/5 Thish Deup Denis D'out Chand. R-T' NSICU Cooling Fam 1 Tripped R-4: 40 to Pks J-P-4/7: bet W/B Tengs while ant there

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08 17 42	J-C: \$3 Steps
18 17	
	She doses P to spice volves She doses P to spice volves She doses P to spice volves C-Q' BV 486 did not close Some vould wrough Transi Mid
	C-R' BV 486 did not close James, Jaines Verd (X)
	May need to look at plats to sive her
	L to get tenun of PORU closery instruction to cles
	PORV value,
2205	J-C: 2220-2250 PContes Band DAB TS was entered.
210 05	Por Prose to 2000 # prior to making corrections to roles P (She actually started to country center Pater the bound was peridde)
34 30	C-J': VET Temp ale clear, frequends repositioning Value 129
	C: Adjuster Par Spray in Namal. Cop 1 & 4 Spray Valuescuse
37 24	5-114 3 Steps She was outstall
Sprays to ->	Look at data
40 37	PAR P = 2270#
45 23	Tone 1,5 cold (Dain, Bing)
	[Tare Bard siven Porlineus = 20F-
	while rads in Wanded
	C-T-C: \$ 3 Stps
	C-J.C: 43 Steps
53 19	C-J: REUST law level Ollan
55 00	C-T: 93,8% & PWST level
56 dy	J: Neutions 1 have 7.5
—	
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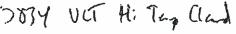
Appendix D	Required Operator Actions	Form ES-D-2

Op-Test No.: 2012-301 Scenario No.: 7

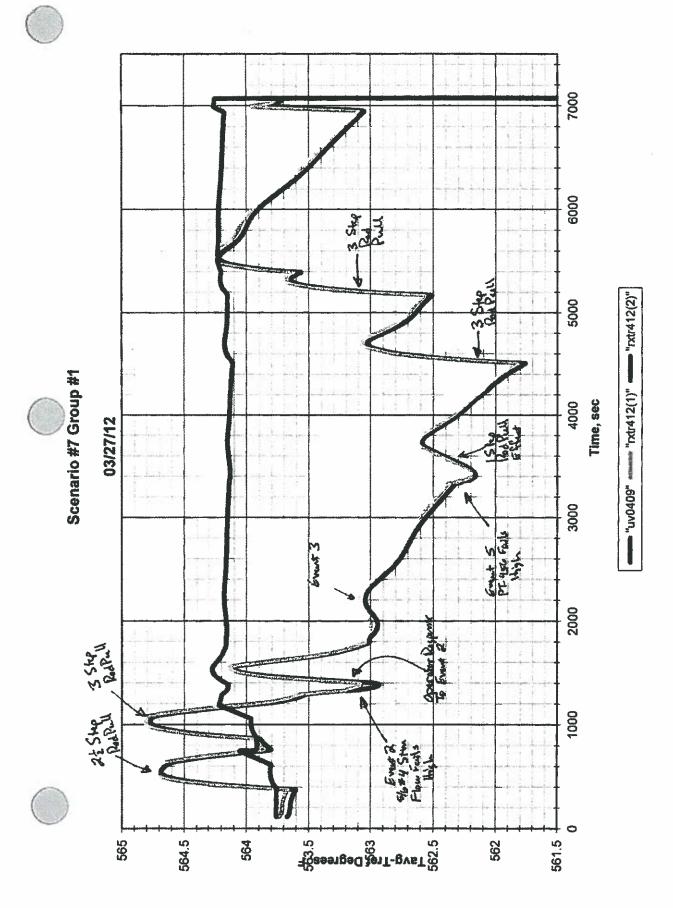
Event No.: 5

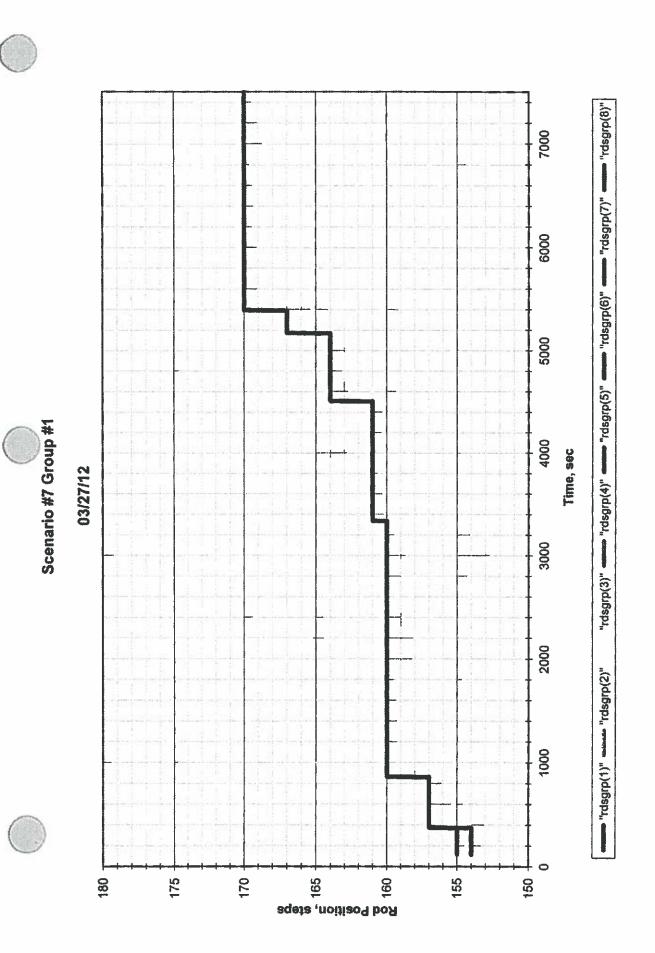
Event Description: PAZR pressure channel PI-456 will fail high with the PORB Block Valve HV-8000B failing to close in automatic on low RCS pressure of 2185 psig. The OATC will be required to manually close PORV 456 or HV-8000B to prevent a Reactor trip.

lime	Position	Applicant's Action or Behavior
	OATC	C7. Select unaffected channels on PS-455F:
	0824	Failed Channel Select P455 CH457 / 456
		~ <i>P456</i>
		P458 CH455 / 456
	OATC	C8. Perform the following:
		a. Check PRZR pressure - STABLE AT APPROXIMATELY 2235 PSIG. 2244 F
	10	b. Place PRZR heaters in AUTO. C. Place PRZR spray valve controllers in AUTO (M.)
		a. Adjust PRZR pressure to approximately 2235 psig using PRZR heaters and sprays.
	OATC	C9. Place PORVs in AUTO and verify proper operation.
0631	OATC	C10. Return PRZR pressure Master Controller to AUTO.



0837 Un A Ob +2° The Lan @ -2.4 0842 Brand 130 sate 51°?





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08 17 42	J-C: 43 Steps 1.
	C-T'ORZ P Fairer J-c' Shut That Value,
	C-T'ORZ P Fairure J-c' Shut That Value, She doses P = p concur volves She doses P = p concu
	C-R' BV 486 old not close Directed to James Med (X)
	May need to look at plats To sive her
	L to get timens of PORU closure in toucher to class
	PORV value,
22 05	J-C: 2220-2250 PContes Band DAB 75 was sontens.
26 05	PSR P rose to 2000 # prior to making consections to rodus P (She actually started to ceruitly center Paten the bound was presided)
34 30	C-J': VET Temp ale clear, Recounds repositioning Value 129
	C: Adjustin Par Spray in Namal. Cop 1 & 4 Spray Valuescus
37 24	5-114 3 Stps She was outside &
Sprays to	ak at our
40 37	Par P = 2270#)
45 23	Tone 1,5 cold (Dain, Bipp)
	[Tare Bard siven Porlinus 5 20F-
	while rods in Wanual
	C-T-C: \$ 3 Stps
•	C-T.C: 43 Steps
•	CJ: REUST law level Olan
	C-5: 93,84 & RUST level
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Appendix D	Required Operator Actions	Form ES-D-2

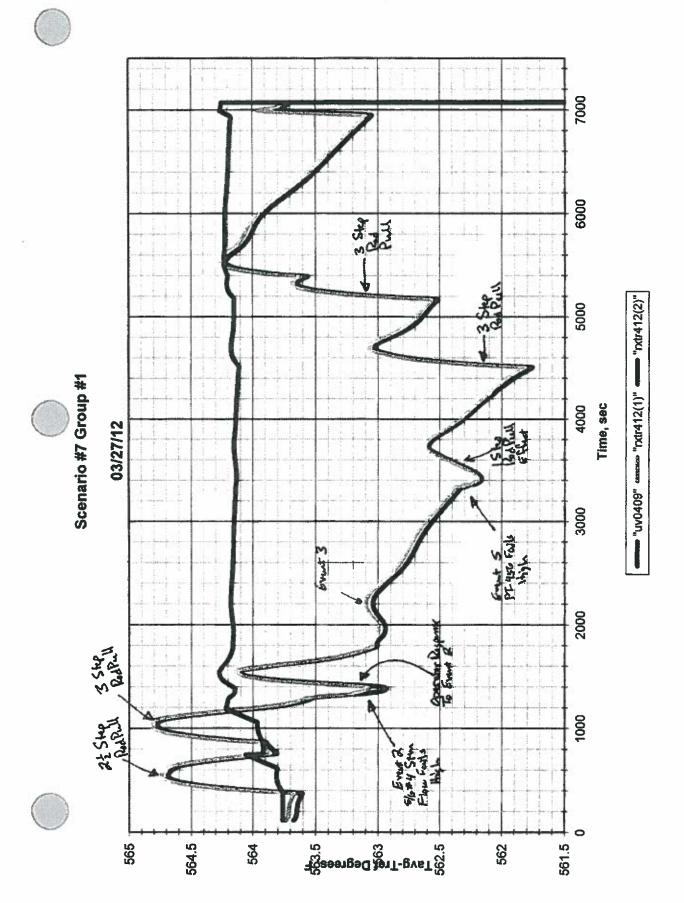
Op-Test No.: 2012-301 Scenario No.: 7

Event No.: 5

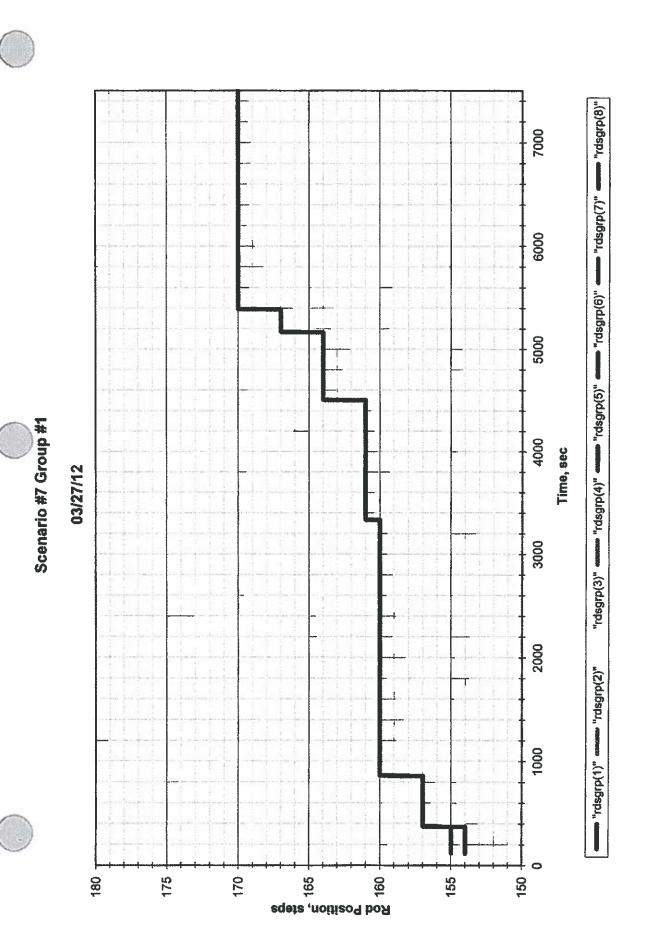
Event Description: PRZR pressure channel PI-456 will fall high with the PORB Block Valve HV-8000B failing to close in automatic on low RCS pressure of 2185 psig. The OATC will be required to manually close PORV 456 or HV-8000B to prevent a Reactor trip.

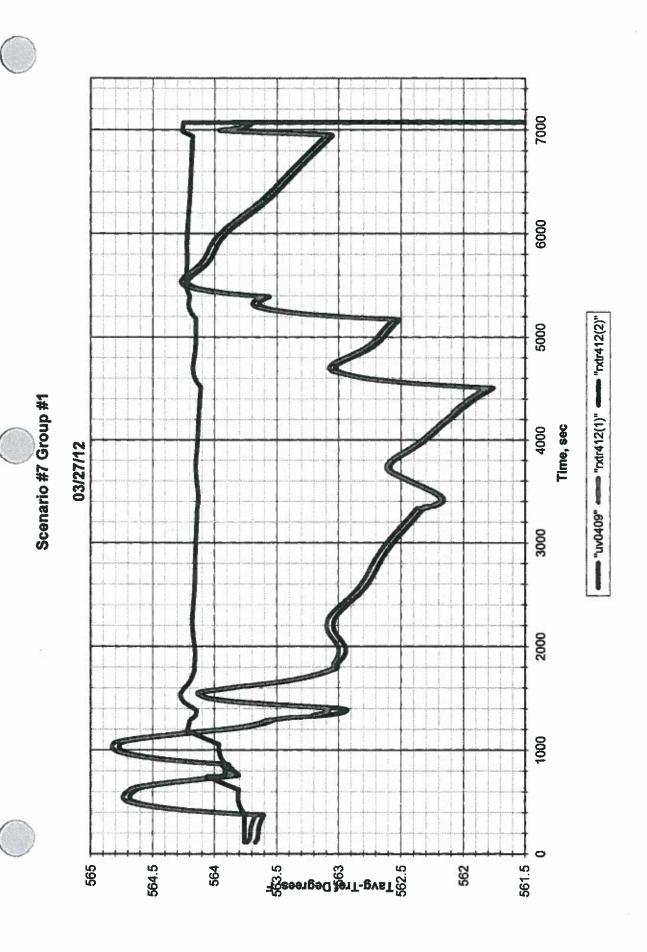
Time	Position	Applicant's Action or Behavior	
	OATC	C7. Select unaffected channels on PS-455F:	
	0 824	Falled Channel Select P455 CH457 / 456 - P456 CH455 / 458 P457 CH456 / 456 P458 CH455 / 456	_
	OATC	C8. Perform the following:	lh 1
	-	a. Check PRZR pressure – STABLE AT APPROXIMATELY 2235 PSIG. 2244 F D. Place PRZR heaters in AUTO.	Is the Hock of
	10.	RNO: Net Place PRZA spray valve controllers in AUTO	and Similar
		Adjust PRZR pressure to approximately 2235 psig using PRZR heaters and sprays.	Mick
	OATC	C9. Place PORVs in AUTO and verify proper operation.	State.
159C	OATC	C10. Return PRZR pressure Master Controller to AUTO.	Sing of Breg
<u>`</u>	534 VCI 4= 0837 (Hi Tay Clard Lett Spray in French? Sar parts 5 ve can change 125 best to vex 1835 22 1-3 A Obj +2° True dan @ -2.4 Obstr Binded 130 sete 51	· 7) for

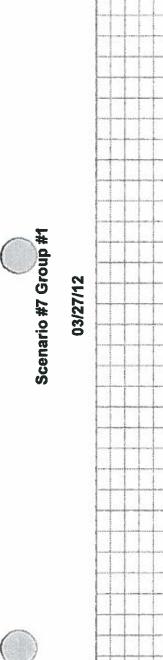


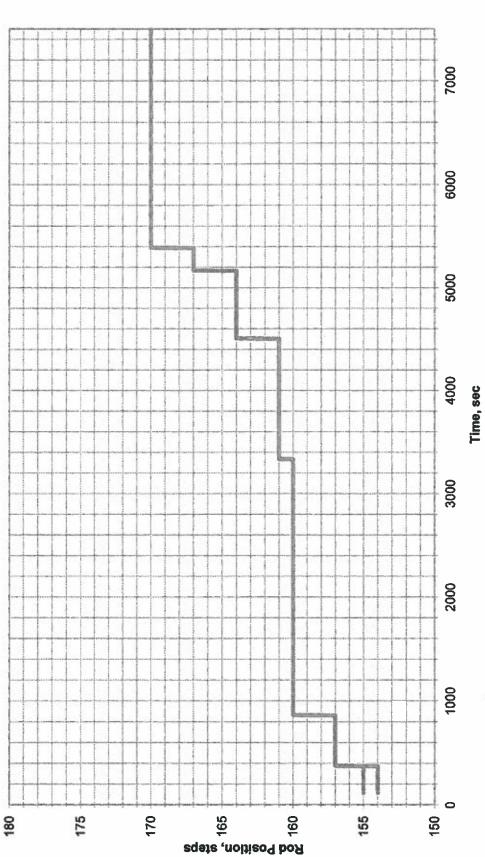














"rdsgrp(3)" === "rdsgrp(4)" === "rdsgrp(5)" ==== "rdsgrp(6)" ==== "rdsgrp(7)" ==== "rdsgrp(8)"

--- "rdsgrp(1)" --- "rdsgrp(2)"