

Exhibit CCS-098

Exam team binder for EHC
says that the Alarm did
not come in. C. Smith
Disagrees.....This
information is not
documented in their notes

Binders were created after
test appealed and
allegations of bias

RATING FACTOR 1.B.: INTERPRETATION/DIAGNOSIS, ENSURE ACCURACY

1. Examiner comment on 303 form p. 8 of 32, related to Scenario 3, Event 5

A. FACTUAL SEQUENCE OF EVENTS

-During the simulator scenario, at time 11:30:49, event 5 was initiated with a trip of the running EHC pump.

-The trip of the EHC pump caused alarm ALB33-B07, 480V SWGR 1NB02 TROUBLE, to annunciate.

-At time 11:31:57, Carla directed the [REDACTED], as Reactor Operator (RO), to dispatch a field operator to investigate the condition.

-As Senior Reactor Operator (SRO), Carla directed the BOP operator (not an applicant, a surrogate) to reference the ARP for alarm ALB20-D05 HYD FLUID LO PRESS. **Note that this alarm never annunciated during this event.**

-In accordance with the ARP actions for ALB20-D05, Carla directed the BOP operator to manually start the standby EHC pump. This pump was started at time 11:32:20, approximately 1 minute and 31 seconds after the initial trip of the running EHC pump.

-Carla did not solicit EHC pressure values or trends before directing the standby pump to be manually started.

-Annunciator ALB20-D05 did not actually annunciate during the event, because the standby pump was manually started before EHC pressure lowered to the setpoint of 1500 psig. Of note, the auto-start of the standby EHC pump is set at 1400 psig. If EHC pressure were to continue to lower to 1100 psig, an automatic turbine trip signal would be generated. For this event, the lowering EHC pressure was only due to the pump trip and not a leak or rupture in the EHC system.

-At time 11:34:17, Carla called Clearance and Tagging (C&T) to direct them to

These are the only notes that Mark Bates took on this entire event during the exam for the EHC Pump. Review his handwritten notes on NRC-033 page 3-10

30 49	Alarms R-C: Trip of EHC Pp.	HYD. Fluid Lo P
32 20	C-F: Start EHC Pp B'	C-F: pull Panel 20 (D-5)
	During prep week it was several minutes to see P decay.	

These are the only notes that Phil Capehart took in relation to the alarm coming in for the EHC Pump. Review his handwritten notes on NRC-033 page 11-13

NRC-033
Submitted: May 31, 2013
Capchart

Appendix D Required Operator Actions Form ES-D-2

Op-Test No.: 2012-301 Scenario No.: 3

Event No.: 5

Event Description: Main Turbine EHC pump 1 trips and the standby pump fails to automatically start on low pressure. The UO will refer to ARP-17033-1 for corrective actions. The standby pump will be manually started to prevent a turbine trip on low EHC pressure.

Time	Position	Applicant's Action or Behavior
1131.08	UO	Diagnoses trip of EHC pump: <u>Alarms:</u> ✓ ALB33-B07 480V SWGR 1NB02 TROUBLE ALB20-D05 HYD FLUID LO PRESS (after several minutes) S->u Pull D05 ARP <u>Indications:</u> EHC pump 1 (HS-6539): Red - OFF Amber - ON Green - ON EHC pressure (PI-6338) <1600 psig and lowering. EHC Pump 1 amps (II-40073) drop to 0 amps.
1131.59	UO	S->A Dispatch A to investigate
	UO	Refers to ARP 17033-1 for Window B07. (480V SWGR 1NB02 TROUBLE)

C. Smith assumes the check mark is the examiners method of proving that the Alarm came in. This is not a good method to base a license denial

Exhibit CCS-005A, NUREG 1021, ES 302 (ADMINISTERING OPERATING TEST TO INITIAL LICENSE APPLICANTS), page 138 states:

Form ES-D-2 as a guide while administering the simulator tests. If an applicant performs as expected, the examiner may simply note in the left-hand column of the form the time when the expected actions occurred. However, if an applicant does not perform as expected, the examiner should note the applicant's actions (or lack thereof) next to or below the expected action and follow up with appropriate questions after the simulator scenario is completed (refer to Section D.3.n).

Looks like if the action did not occur as expected that the examiner is suppose to document the action or lack thereof.....These individual are basing a license denial on poorly supported information in their notes. The impression is they can come an update the information at any time even if not supported by actual data. **If it is appropriate to receive the EHC pump then there should be supporting documentation to prove their stance.**

Exhibit CCS-005A, NUREG 1021, ES 302 (ADMINISTERING OPERATING TEST TO INITIAL LICENSE APPLICANTS), page 139 states:

- p. If the applicants did not perform as expected, the examiner shall ask the simulator operator to provide copies of the logs, charts, and other materials that may be required after leaving the facility to evaluate and document the applicants' performance. The examiner of record shall retain all documentation related to any operating test failure until the proposed denial becomes final or a license is issued.

This appears to be the expectation when collecting data, it is not logical that a license denial is based on information that can't be supported by factual data – The examiners willfully ignored their own procedural guidance. This says to request info to document performance.