

Exhibit CCS-081

Shows how Exam team
binders have information
not documented in their
notes

Binders were created after
test appealed and
allegations of bias

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:?? [REDACTED] 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, [REDACTED] 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, [REDACTED] 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.

RATING FACTOR 3.C.: CONTROL BOARD OPERATIONS, MANUAL CONTROL

1. Examiner comment on 303 form p. 21 of 32, related to Scenario 7, Event 3

A. FACTUAL SEQUENCE OF EVENTS

- During the simulator scenario, event 3 was initiated at time 07:54:54 with a TE-0130 failure low.
- As a result of this failure, TV-0130 will throttle shut, raising the actual Letdown Heat Exchanger outlet temperature.
- At time 07:55:46, examiner noted that Carla appeared to diagnose the failure correctly. The examiner also noted that [REDACTED] opened the ARPs, and Carla did not open any ARPs.
- At time 08:00:30, [REDACTED] referenced CVCS system P&IDs.
- At time 08:01:54, Carla pointed to the controller, looked at [REDACTED], and stated, "the only thing we can do is call C&T to get the TE fixed."
- At time 08:02:45, [REDACTED] directed Carla to take manual control of TIC-0130 and monitor VCT outlet temperature.
- When Carla initially attempted to manipulate the controller, she incorrectly pressed the "up arrow" button instead of the "down arrow" button.
- Shortly thereafter, [REDACTED] told Carla that the controller raises and lowers temperature, it does not open and close the valve.
- At time 08:05:00, the LETDOWN TEMP DEMIN DIVERT alarm cleared.
- During this sequence of events (approximately 10 minutes of simulator runtime), Carla was physically located in front of the panel with the TE-0130 controller (slightly to the "left" of the main OATC control station). As noted in a previous comment (related to scenario 7, event 1, rating factor 3.a.), P. Capchart and M. Bates held a discussion pertaining to the long duration of time that elapsed without Carla walking back to the OATC station to monitor key reactor plant parameters.

During post-scenario follow-up questions, the examiner asked what procedure guidance was used to manually control TE-130? Carla looked through the LETDOWN HX OUTLET HI TEMP ARP. During this discussion, Carla stated that she had initially pressed the "up" button, and then subsequently pressed the "down" button. The examiner asked "walk me through the diagnosis and the plant response?" Carla stated that demand goes down, causing flow through the heat exchanger to lower, it's a reverse-acting controller.

At 07:54

Notes in binder stated that C. Smith was in front of TE 130 the entire time and that she was not monitoring parameters

Binders created by the exam team would be expected to have factual data, or info collected on that day and not extra information added after the test was over.

In follow-up questioning C. Smith answered every question asked about the plant status without looking at any references. What was the highest temp deviation and what was the highest AFD (and what was the limit).....C. Smith did not understand why those questions were asked but she answered them all correctly. She was monitoring reactivity/plant conditions. This is an opinioned statement with no basis.

Time	Position	Applicant's Action or Behavior
	OATC	Diagnose TE-0130 has failed low. Symptoms / alarms: ✓ ALB07-F04 LTDN HX HI TEMP DEMIN DIVERT ✓ ALB07-B04 (VOLUME CONTROL TANK OUTLET TEMP HI (delayed, or may not come in) Indications: ✓ TE-0130 reading down scale low. ✓ TE-0130 red UP arrow – LIT. (Indicates attempting to raise letdown temperature). • Amber light on 1HS-129 LETDOWN TO DEMIN / VCT – LIT.
	OATC	ALB07-F04 response actions: AUTOMATIC ACTIONS: Letdown flow is diverted away from the Mixed Bed Demineralizers directly to the Reactor Coolant Filter.
	OATC	INITIAL OPERATOR ACTIONS 1. Check letdown temperature on 1-TI-0130 on the QMCB. (failed) 2. IF necessary, initiate 18007-C, "Chemical Volume Control System Malfunction". (not necessary, letdown is not lost) 3. Check for ACCW normal operation. (TV-0130 not normal)

Time	Position	Applicant's Action or Behavior
	OATC	AUTOMATIC ACTIONS NONE INITIAL OPERATOR ACTIONS Check normal operation of ACCW and, if necessary, initiate 18022-C, "Loss of Auxiliary Component Cooling Water".
	OATC	SUBSEQUENT OPERATOR ACTIONS <i>OKL MC failed up Trip on IPC</i> NOTE Seal water injection flow to the Reactor Coolant Pumps (RCPs) should be maintained less than 130°F. 1. Monitor VCT outlet temperature using 1-TI-0116 on the QMCB. 2. Check letdown flow using 1-FI-0132 and temperature using 1-TI-0130 on the QMCB. 3. Adjust the charging or letdown flow if necessary to reduce the letdown temperature. 4. Return to normal operation as soon as possible per 13006-1, "CVCS Startup and Normal Operation." 5. IF equipment failure is indicated, initiate maintenance as required. COMPENSATORY OPERATOR ACTIONS NONE – End of 17007-B04 actions.

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Time	Position	Applicant's Action or Behavior
	OATC	SUBSEQUENT OPERATOR ACTION 1. Attempt to balance charging and letdown flow. 2. WHEN letdown temperature is restored, return 1-TV-0129 to the DEMIN position. 3. IF instrument or equipment failure has occurred, initiate maintenance as required. COMPENSATORY OPERATOR ACTIONS NONE <i>Take manual control of TV-0130 if low temp by adjusting temp setpoint.</i> Note to examiner: The OATC can control cooling flow to the VCT using TV-0130. For 120 gpm letdown flow, this is normally set to 51% (note dry erase board on SS throne). It is expected the OATC will take manual control of TV-0130 to control cooling flow. End of 17007-F04 actions. <i>Up to Temp Alarm Cleared</i>
	OATC	ALB07-B04 actions (LTDN HX HI TEMP DEMIN DIVERT) PROBABLE CAUSE 1. Low Auxiliary Component Cooling Water (ACCW) flow through the Letdown Heat Exchanger. 2. Low ACCW flow through the Excess Letdown Heat Exchanger or Seal Water Heat Exchanger if aligned to the Volume Control Tank (VCT).

From Exhibit NRC-022, PAGE 14-21

Copy of Capehart notes
No Hand written notes
from event #3. No notes
are taken following this
page for this event. The
actual origination of the
notes NRC-022

Review copy of notes in CCS-039 Binder 11 for pages 5-16 AND NRC – 038 Binder 13 for pages 3-17 for a copy of Michael Meeks and Mark Bates notes. Notice that no notes indicate this information that was added Beware of the data proved in the Binders because it contains handpicked information some information is not in the examiner notes. It is not creditable to add information after the test is over in light of the circumstances.

This Exhibit is an example, there are other examples (adding alarm not coming in for the EHC pump was added after the test was over but no factual data supports it). However in the interest of time this data could not be constructed for each binder. Request that the notes and simulator data is recognized as the creditable source at the back of the Binder