

DRAFT OUTLINE COMMENTSFacility: ANO Unit 2First Exam Date: February 7, 2014

Written Exam Outline (11/26/2013)		
Comment	Resolution	
1	The outline generated by NRC and provided to you was Revision 0. The outline you sent with the Draft Outline submittal should be Revision 1. Update your version as Rev 1.	Draft Outline updated to Revision 1
2	Descriptions in K/A Topic(s) column – does your program only list the first K/A for systems that have more than 1 K/A selected? (Example: QID – 31/32)	Re-ran program. QID 31/32 wording added
3	ES-401-4, Record of Rejected K/As reviewed – no issues. Oversampling concerns were identified and discussed prior to outline submittal.	N/A
4	What program was used to create outline?	N/A – Outline provided by NRC
5	Describe methodology used (or program specs).	N/A – Outline provided by NRC
6	How were K/As with < 2.5 IR handled? Were they removed from the sample prior to random selection? If yes, were all K/As with < 2.5 IR reviewed to determine that none had a site-specific reason to raise their IR?	N/A – Outline provided by NRC

Generic Operating Test Comments

1. How did you comply with ES-301, D.1.f? Identify PRA, industry OE events, site-specific events, time critical operator actions, etc. This is applicable for JPMs and scenarios.

2. Ensure all reference materials are included with Draft Op Test submittal – see ES-201, Attachment 3. There are a lot of them so plan accordingly.

3. Since the examiners aren't familiar with ANO Unit 2, include noun names with equipment identifiers. Example: 2P-7B will be written 2P-7B, EFW pump

4. Similarly, procedures shall include titles (at least the first time they are used in a paragraph or Event or JPM step). Example: OP 2203.003 will be written OP 2203.003, CEA Malfunctions.

Administrative JPM Outline (11/26/2013)		
	Comment	Resolution
1	A2 and A7: Make sure you incorporate all comments / lessons learned from previous NRC exam (2012).	Comments will be reviewed and incorporated.
2	A4 and A7: Ensure JPM tests the issues (weaknesses) identified in ANO-2012-633.	A4 and A7 will test the weakness identified during the previous NRC exam. Scenario 1 will test weakness with CEAC/CEA position.
3	A9: Replace this JPM. EAL classification has been performed on at least last 2 NRC exams. Consider JPM for toxic gas or other Emer Plan activity.	Will work with Examiner to determine a viable alternative. Some potential replacements have been identified.
4	A3: Evaluate Containment Atmosphere conditions – is this a surveillance?	Yes. Daily (performed every 12 hours)

Control Room / In-Plant System JPM Outline (11/26/2013)	
Comment	Resolution
1	Ensure no overlap between CR-IP JPMs and simulator scenarios. We have verified no overlap. Will continue to check with each revision.
2	P2: replace with P1 (non Alt Path) from 2012 NRC exam. The SDBCS has been tested on last 2 NRC exams and is included in Scenario 3 as Event 7. P2 replaced as requested.
3	Make SRO-U JPMs S1, S4 and P1-3. For Safety Function consideration, replace P3 with Safety Function 8 JPM that is A/N/R. Modified SRO-U selections for JPMs. Systems in Safety Function 8 are limited in RCA. Recommend leaving as is.
4	SRO-I: what was basis for them not doing this JPM? No special basis.

Generic Simulator Scenario Comments

1. Alternate events between ATC and BOP (unless good reason not to).
2. Scenario D-1's, don't repeat information from Initial Conditions to the Turnover block. Turnover information is generally short – it only applies to activities that the applicant would get for their specific watch. Example – the evolution planned.
3. All Tech Spec's need to identify the LCO Condition(s) that applies. D-2's must identify which Tech Spec calls are "shall be" verses those that "may be" identified.
4. All evolutions will require a procedure copy that has been place-kept up to the point where the crew will commence the evolution.
5. What are the Critical Tasks for each scenario? Ensure each Critical Task has clearly defined success (and therefore – failure) criteria identified. May need to get an Operations representative on the Exam Security Agreement for input (Assistant Ops Mgr or above).
6. Does each scenario have a clearly defined end point?
7. Attach the table of Target Quantitative Attributes (found at the bottom of ES-301-4, Simulator Scenario Quality Checklist) to the bottom of each D-1 or on the next page. I've included an Adobe (.pdf) example for your reference. (I don't necessarily agree with the format or level of detail contained in this example – it's just for demonstrating use of the Target Quantitative Attributes table in the D-1.)
8. It should be possible to determine whether each Event is ACA or AOP or EOP driven. Either identify in the Event Description or in the narrative summary.
9. In general, Events should alternate between ATC and BOP. This allows the Lead Examiner the opportunity to run two events in parallel (or at least start the next Event without having to wait for the applicant to completely finish).
10. Initial Conditions – don't need to state "All ESF systems in standby" or other similar statements. Only need to identify conditions or lineups that are out of normal.
11. Event Descriptions on D-1: should be succinct. Details are put in Narrative Summary.

Simulator Scenario # 1 Outline Comments (11/26/2013)		
Comment	Resolution	
1	Re-order Events 1 – 3 – 2 – 4 (see #9 above).	Changed as requested.
2	Event 3: Event Description – what is instrument name/number?	Instrument Number has been added.
3	Event 5: Ensure rate of oil leak is small enough that crew can step through procedure.	Oil leak size is of an adequate size to allow the procedure to be implemented.
4	Event 6: Fail CSAS to auto actuate	Will add CSAS fails to complicate post trip. After discussion I am still concerned that this will cause an additional critical task. May want to fail only one train.
5	Event 7: Is loss of both EFW pumps “reasonable” without a preceding incident? Should one pump be tagged out? Loss of a power supply bus?	Discussed and No changes required.
6	Event 7: Delay LOAF until SRO completes diagnosis of ESD and makes procedure transition.	Discussed and this would impact the contingency procedure use. Leave as is.
7	Add Event 8 for ATC – running CCP trips and loss of Aux Spray.	Discussed and this malfunction will not work as desired. Will attempt to add an ATC malfunction after the major.

Simulator Scenario # 2 Outline Comments (11/26/2013)		
Comment	Resolution	
1	Narrative says scenario begins at 100% power – should be 40%	Updated typo.
2	Initial Conditions – will need a power band for crew to maintain (not “approx. 40%”)	Power band has been added.
3	Event 2: How is this affected by “C” already in Bypass?	This will cause points in the B channel Excore to be tripped instead of bypassed.
4	Prior to Major Transient – BOP has 4 beans, ATC has 2. Change Event 4 to an ATC bean.	After discussion will attempt to change normal to ATC to even out distribution.
5	Re-order all events to alternate between ATC and BOP.	Events have been reordered.
6	Event 3: BOP can be given credit due to verifiable actions with SDBCS.	Updated for BOP credit.
7	Event 4: How long does crew have to restore CCW to RCPs? Is this a Critical Task?	10 min. Not a critical task.
8	Event 4: Is 2P-33A not already running when 33B trips? Narrative states “and start 33A”	No. 2P-33A will not be running and receives no auto start signals.
9	Event 5: We will need shutdown specs (amount boration needed, CEA's) so we can compare what applicants determined with what should have been identified. Also need to identify actual leak rate in the D-2s)	Added reactivity plan data for the first 15 min.

Simulator Scenario # 3 Outline Comments (11/26/2013)	
Comment	Resolution
1	Initial Conditions – Don't need to state "All ESF systems in standby."
2	Alternate events between ATC and BOP.
3	Event 2: Is this an AOP event?
4	Event 6: Crew waits for NLO report to start HPSI pump? What about the LPSI pump?
5	Event 6: RED Train maintenance week – any impact on this event?
6	Event 6: What is failure mode? Would manual actuation be successful? Should they attempt a manual actuation?
7	Event 7: ATC selects another steam dump bypass valve to re-initiate the cooldown?