

NRC Exam Submittal Comments for Fermi 2013 Initial Exam

	Examiner Comment	Facility Action/Response
RO Operating Test		
JPM RO A1 Calculate a Reactivity Change	<ol style="list-style-type: none"> 1. Procedure and REMA form will be provided to applicant when asked since applicant may ask for Curve Book instead! 2. Step 4 – Initiating cue specifies UNIT 1, but Standard Specifies UNIT 2. 	<p>Will ask what references are required.</p> <p>Changed JPM Standard for Step 4 from Unit 2 to Unit 1</p>
JPM RO A2 Identify Leak Isolation Points from M&E prints	<ol style="list-style-type: none"> 1. Need to identify a Task Standard for JPM. 2. What is the basis for rejecting alternate isolation points (e.g., 1CS018A and 1CS021A)? 3. Revise Initiating Cue to eliminate SM Cue in step 4. 	<p>Task Standard added.</p> <p>Procedure has applicant tag closest isolation points.</p> <p>Cue to either be eliminated or not provided by examiner.</p>
JPM RO A3 Respond to GDT High Activity	<ol style="list-style-type: none"> 1. Explain how this task relates to K/A 2.3.13 2. How does a high activity level in a Gas Decay Tank impact performance of Licensed Duties of the RO? 3. What is the knowledge/ability being tested? 4. There are no verifiable actions for critical steps 4 and 5. 5. Identify Task Standard 	<p>K/A is applicable for high radiation in WGDT. Task is applicable to RO duties.</p> <p>Following procedure, and performing calculations. Procedure adherence is being exercised.</p> <p>Task standard to be added.</p>
JPM RO A4 Respond to Turbine Bldg Fire Alarm	<ol style="list-style-type: none"> 1. Replace JPM; Neither the selected K/A nor Task is related to the Emergency Plan or its Implementing Procedures (ES 301 D.3.a; page 11 of 27) 2. Explain how task relates to K/A 2.4.25 3. Appears related to K/A 2.4.27 4. Note before step 4 states that Steps 4, 5, and 6 may be performed in any order but BAP1100-10 specifies order. 5. Cue in Step 7 needs more specifics or preferably an intermediate step requiring RO to request additional information (from BAP 1100-10: 	<p>This JPM implements Emergency Plan for a fire.</p> <p>Will change K/A to 2.4.27.</p> <p>Examiners expect the applicants to follow sequence provided in BAP 1100-10.</p> <p>Agreed, but detail needed may not be available this early in the event.</p>

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	<p>“Obtain as much specific information on the injuries and fire condition as possible to provide the offsite assistance when contacting them.”</p> <p>6. Critical Step #9 is an error likely situation if applicant does not refer back to BAR after entering BAP 1100-10.</p> <p>7. Identify Task Standard.</p>	<p>Agreed. May have to prompt applicant what equipment is affected.</p> <p>Task standard to be added.</p>
<p>JPM SRO A1 Review of Offsite Power Availability Surv.</p>	<ol style="list-style-type: none"> 1. On page 5 of 8 step 1 CUE, there is no data package labeled “W” on bottom left of cover sheet. 2. On page 5 of 8, step 2 shouldn’t the standard be checking busses 6 and 13 energized??? The standard says busses <u>7</u> and 13. 3. On page 6 of 8, step 8 the standard says ‘Determine acceptance criteria NOT met at step G...’ shouldn’t this be step 10. 	<p>This JPM was too complicated to administer as is. This JPM was modified for the applicant to review 1BOSR 8.1.1-1 and identify that an acceptance criteria was not met.</p>
<p>JPM SRO A2 Evaluate License Holder Status</p>	<ol style="list-style-type: none"> 1. Need to explain why NSO 4 is qualified because the annual operating test requirement doesn’t look like it is met. ANNUAL is defined OP-AA-105-101 and NSO 4 doesn’t met the annual operating test requirement. The date need to be changed from April 4 to May 4 if you want him to be eligible. 	<p>Per OP-AA-105-101, must complete an annual operating test by the end of the Calendar Year!</p>
<p>JPM SRO A3 Initiate a LCOAR</p>	<ol style="list-style-type: none"> 1. Identify the Task Standard 2. Should be listed in ES 301-1 as (M)odified; Same JPM used in 2012 but this one modified by changing SSC with different applicable TS LCO 	<p>Task Standard to be identified.</p> <p>This LCOAR is different than the Admin JPM administered in 2012.</p>
<p>JPM SRO A4 Accessing CNMT at Power</p>	<ol style="list-style-type: none"> 1. Is this JPM going to be done in simulator or classroom??? Would probably be better in simulator. Can he find the placards and can he 	<p>This JPM was modified to be performed in the simulator. Placard will be missing and must be located. Must locate MIDS tag out.</p>

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	<p>hang the tags on the MIDs.</p> <ol style="list-style-type: none"> 2. Identify a Task Standard. 3. JPM is NOT time critical. Containment Entry Checklist provided to the applicant must be filled out up to the WEC Supervisor Section 4. Who is responsible for filling out Work Group Lead section and should portions of the section be filled out prior to WEC approval? 5. Step 5, Once applicant identifies need for 1BOL PC-1, provide completed package, rather than giving a verbal cue.(combine steps 5 and 6) 	<p>Task Standard to be identified. Agreed. Must complete in <2 hours.</p> <p>Ops is responsible for this job. Upper section of BAP 1450 T-2 sheet will be completed by RP prior to being presented to SRO for review. Agreed.</p>
<p>JPM SRO A5 Classify and Complete a NARS Form</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. Place initiating cue after the Plant Conditions 3. There are two time critical actions here <ul style="list-style-type: none"> • Classify within 15 minutes of acknowledging Cue • Notify; Start time begins upon completion of Classification and ends 12-13 minutes later (TBD such that there is time remaining to make call) 4. Preferably completed in MCR or Simulator 5. Change cue to say and fill out NARS form if it is required. We don't want to tell them to fill it out because then we tell them that a classification is to be made. Let them determine that. 	<p>Task Standard to be identified. Agreed. Agreed.</p> <p>The applicant will be allowed 12 minutes to complete the NARS form.</p> <p>Location to be determined by schedule. No, they must be cued to perform this action since completion of the form is critical to the JPM.</p>
<p>JPM Sim01 Letdown Orifice Operation</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. What is the intent of "Note 1" in Step 1? Procedure is a "Continuous Use" procedure so procedure must be obtained and referred to prior to performing the assigned task. 	<p>Task standard to be identified. If applicant brings in the alarms in the NOTE, the applicant will get a comment. Standard is to operate the system without bringing in these alarms!</p>

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	<ol style="list-style-type: none"> 3. Step 3 is identified as “critical.” It appears that only placing the controller in MANUAL should be the critical element since controller is to be adjusted in Step 5. 4. Initiating Cue does not specify which orifice to place in service but Step 5 standard specifies “A.” Is "A" the only available choice? 5. Shouldn't the Standard for Step 5 specify a maximum flow rate (reference Limitation E.1 of BOP CV-9) as well as minimum and maximum pressures? 6. Initiating Cue is to place system in AUTO, therefore Step 8 should also be “critical.” 7. This JPM may duplicate scenario. 	<p>Yes, controller to MANUAL is Critical.</p> <p>Yes, to get from 75 gpm to 120 gpm letdown flow, applicant must manipulate “A” orifice. The other orifice is incorrect.</p> <p>This is finesse of the operator. Operator should not bring in any alarms in NOTE 1!</p> <p>Yes, but it may take a while for the system to settle. May not complete the last step.</p> <p>Both the JPM and a scenario event operate the Letdown system, but both events are different!</p>
<p>JPM Sim02 Raise SI Acc Pressure</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. Move 1st Initiating Cue to the Third initial condition 3. Delete Initiating Cue #3. Verbal Cue is already provided in Step 1 4. Is Cue in Step 3 necessary? If control is located on 1PM06J, then operator should be able to actually perform/verify. 5. Step 8 <ul style="list-style-type: none"> • Does 1SI8880 need to be closed before exceeding 647 psig to be considered SAT? Need a contingency if 1SI8880 is not closed before accumulator pressure increases above limit (647 psig) (e.g., decreases pressure IAW applicable procedure). • Would shutting ONT078 instead of 1SI8880 be a successful alternate path? Why or Why Not? 	<p>Task Standard to be identified.</p> <p>Agreed.</p> <p>May keep Cue #3 as is since Cue #3 is more than just the valve operated in the JPM.</p> <p>Delete Cue in Step 3.</p> <p>If operator exceeds 647 psig, then initial cue not met, “..restore SI Accumulator pressure to within TS limits.”</p> <p>Yes, but it does not clear the TS condition!</p>

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	<ol style="list-style-type: none"> 6. Shouldn't determination of whether or not to Exit 1BOL-5.1 be evaluated as a step or sub-step? 7. At step 8 of the JPM why isn't closing 0NT078 also a correct action for completing the critical step??? Add "Close either 1SI8880 or 0NT078 to stop pressure increase" 	<p>Either way, examiner should ask this of examinee to determine knowledge of Tech Specs.</p> <p>Either valve is acceptable. The intent is the student must recognize that pressure rise to accumulator must be halted.</p>
<p>JPM Sim03 Synchronize DG to ESF Bus</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. What is the trigger for the Governor Adjust Switch failure? 3. Is it appropriate to leave the engine running unloaded? 4. What if the applicant trips the engine per Precaution D.2? 5. At step 3 with Auto Re-close Circuit Arm Selector Switch NOT in SURV TEST will EDG be OPERABLE??? If it is INOP during surv if NOT in SURV TEST this should be a critical step. Bkr may not auto reclose when it needs to. (Technical Question) 	<p>Task Standard to be identified.</p> <p>Can operate in this condition for several hours provided cooling water pump is running. Not wrong, may ask applicant why this action was taken!</p>
<p>JPM Sim04 Turbine Driven FWP Swap</p>	<ol style="list-style-type: none"> 1. Identify the Task Standard 2. Move Initiating Cue #2 to Initial Conditions 3. Step 2 should include action to verify that Turning Gear Disengages and De-energizes. 4. Step 7 standard should include verification that Turbine is tripped (e.g., HP and LP stop valves closed and speed decreasing). 5. A better alternate path might be to fail the local and remote trip push-buttons (require closure of HP and LP stop valves, reduce speed manually, and/or isolate steam supply). 6. Initial condition 4 'pumps' should be 'pump' 	<p>Task Standard will be generated.</p> <p>Optional.</p> <p>This will take a long time to occur and might not happen before JPM is ended.</p> <p>Redundant to Trip. May ask applicant follow up question as to what a tripped turbine looks like.</p> <p>Optional, but not incorporated.</p> <p>Will make pump singular.</p>

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	<p>7. Step 6 why is the U-2 assist NSO reporting 1PM12J vibration readings??? This should only be giving if the applicant asks the U-2 assist NSO to look at them. The AR should give alarm setpoint and where to look at vibration readings. The same can be said for the EO report, it should only be given if asked for following the hi vibration alarm.</p>	<p>Cue provided if applicant asks for information from U2 Assist NSO.</p> <p>An open bullet for contacting the EO is optional. A cue is provided in case applicant does this action.</p>
<p>JPM Sim05 Transfer from FW Bypass to FW Reg Valve</p>	<ol style="list-style-type: none"> 1. This JPM is not a PRIMARY system JPM as indicated by safety function of 301-2 2. Cue needs to be better or JPM needs to allow any feed reg to be manipulated. I recommend change cue to specify swap 1FW510 and then 1FW520. 	<p>This JPM was replaced.</p>
<p>JPM Sim06 SX Flooding Requiring RCFC Isolation</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. Simulator Setup needs to include verification that SX Train A and associated RCFCs are in service 3. Move Initiating Cue #1 to Initial Conditions 4. Are applicants expected to complete pump/train swaps without reference to any other system operating procedures? 5. Is the applicant expected to restart the Train B RCFCs? 6. We shouldn't be overriding CNMT chiller alarms the operator should expect them and not be distracted by them. 	<p>Task Standard to be added. Noted.</p> <p>Optional. Applicants would be expected to obtain a procedure to perform this function.</p> <p>Per the procedure, the applicant would be expected to return the non-leaking previously isolated train to service. Extraneous alarms are overridden so as not to distract the applicant (and the other applicants being tested) in the simulator.</p>
<p>JPM Sim07 Containment Release</p>	<ol style="list-style-type: none"> 1. Identify Task Standard 2. Recommend changing alarm spike to an OP Failure or Upscale Failure rather than spike. This will eliminate confusion with whether spike 	<p>Task Standard to be added. Changed fault to high radiation condition. (Continuously in)</p>

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	<p>is a valid alarm or if alarm is present when applicant checks indication.</p> <p>3. At step 7 I don't think the Unit Sup should direct the applicant to the RM-11 alarm. The applicant is expected to respond to one of his panels it's his responsibility.</p> <p>4. A good follow-up question would be which LCO's are you as a result of this failure???</p>	<p>The alarm is very quiet. If needed, the examiner should prompt the applicant that the radiation alarm is your alarm.</p> <p>Applicant's will get enough challenges in Tech Specs between admin JPMs and scenarios.</p>
<p>JPM Sim08 Start H2 Monitoring System</p>	<p>1. Identify Task Standard</p> <p>2. Given the limited number of manipulations and the time compression cue, the estimated completion time seems excessive.</p>	<p>Task standard to be added.</p> <p>Agreed.</p>
<p>JPM INP01 Local Reset of FW Isolation Signal</p>	<p>1. This JPM should entail obtaining keys and entering panels 1/2PA27J & 1/2PA28J. There is really no need for these pictures the applicants can get the keys open the door and point to the fuses.</p> <p>2. Identify a Task Standard.</p>	<p>Doors are unlocked! Pictures will be removed, have applicant open the cabinet.</p> <p>Task Standard to be added.</p>
<p>JPM INP02 Local Loading of DG</p>	<p>1. Step 4 how are the lock out relays checked for this step. Need to describe how this will be performed. At bus 141 or by checking MCR alarms???. This shouldn't be a cue.</p> <p>2. Step 13 how are these fuses checked without opening a Bkr cabinet door???</p> <p>3. Can we do this JPM on a spare Bkr in the training bldg.???</p> <p>4. Why is this alternate path? Initial conditions already establish that there was a problem with auto closure of the breaker.</p> <p>5. Identify Task Standard</p> <p>6. For step 4, what are the indications that the</p>	<p>Lock out relays checked locally on breakers in switchgear room.</p> <p>Will either provide applicant pictures of inside of cabinet or open breaker cabinet door on spare breaker. Good idea, except breaker in training building won't work with this JPM. It's defective! Breaker won't operate locally manually. Must prime springs to allow for local operation.</p> <p>Task Standard to be identified.</p> <p>Tripped relays have a red flag revealed. Non-tripped</p>

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	<p>relays are not tripped.</p> <p>7. For this task it appears that the engine may be running without a cooling water supply. If this is the case, then the task should be considered time critical, or the initial conditions modified such that the engine is not running and the associated steps to restart incorporated.</p> <p>8. Step 9 should be critical; ensures that DG Output breaker will be closed on a dead bus.</p>	<p>relays are black. True, a bit of artificiality exists to run this JPM!</p> <p>Presently evaluated as non-critical as there is no power on the bus during a black out.</p>
<p>JPM INP03 Local Operation of PZR PORV Block Valve</p>	<p>1. Need a copy of the procedure to provide the applicant.</p> <p>2. Step 1 should not contain a cue to breaker locations. The applicants need to know where to find this equipment.</p> <p>3. What electrical safety equipment is required to remove fuses 46 & 47??? It needs to be listed here for the examiner.</p> <p>4. Identify a Task Standard.</p> <p>5. Move Initiating Cues 1 and 2 to Initial Conditions</p> <p>6. Step 1 -- Remove reference to contacting WEC/MCR.</p>	<p>Agreed. Two procedures will be provided. One for Unit 1 and one for Unit 2. Examiner decides where to run JPM.</p> <p>Agreed. Locations provided for examiner, not applicant!</p> <p>Agreed.</p> <p>A Task Standard will be identified.</p> <p>Agreed.</p> <p>Open bullet is optional. Examiners will not cue applicant as to where the electrical cabinet is.</p>

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Scenarios

<u>Scenario 1</u>	a) Event 5 the first action the RO should take prior to placing RODS to MANUAL is verify the turbine is not ramping excessively / running back! Add to RO actions.	
<u>Scenario 2</u>	<p>a) Why do we have the failure of the feedwater isolation signal in this scenario??? More challenging to operator if feedwater isolation signal occurs automatically at time of Rx Trip. Not taken credit as a ‘bean’.</p> <p>b) Following the 1A CV pump trip, letdown has to be restored. Letdown is manipulated in one of the JPM’s.</p> <p>c) Event 3 is very similar to a JPM as well. In plant vs CR actions!</p> <p>d) Why aren’t the actions to manually isolate feedwater spelled out better in the body of the scenario??? If the operator needs to take an action in accordance with an EOP it should be identified for the examiner.</p>	d) See attachment B, Step 11. Needs better identification!
<u>Scenario 3</u>	<p>a) Event 5 is the same event as scenario 1 event 6. There may be different outcomes but this is preconditioning the operators to be able to respond better the second time.</p> <p>b) Event 3 why isn’t there an action for the crew to initiate a filter change/replacement??? I would not expect a crew to move on without getting the seal injection filter replaced in short order, that is on their shift or the next. I would bag the next shift unless it was the very end of the shift.</p> <p>c) Event 7 why isn’t there a step to dispatch NLO’s to look for the source of condenser air inleakage??? I would expect this to be a normal expected response for the operators.</p>	<p>a) Need to evaluate differences between these two events.\</p> <p>b) May be a good followup question after scenario. Have them add this step!</p> <p>c) Dependent upon ramp rate.</p>
<u>Scenario 4</u>	<p>a) I like this scenario. Is it going to be the spare??? You should use it.</p> <p>b) No substantive comments.</p>	

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