



Scott L. Batson
Vice President
Oconee Nuclear Station

Duke Energy
ON01VP | 7800 Rochester Hwy
Seneca, SC 29672

ONS-2014-158

December 19, 2014

o: 864.873.3274
f: 864.873.4208

Scott.Batson@duke-energy.com

Mr. Victor McCree, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
Marquis One Tower
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Subject: **OCONEE NUCLEAR STATION**
ILT46 Post Exam Submittal

Dear Mr. McCree:

An NRC initial license operating exam was administered the week of December 8, 2014. The associated written exam was administered on December 17, 2014. Oconee has two post exam comments included with this submittal letter as Attachment 1. Enclosed for your review as directed by NUREG-1021 are the following:

- A student seating chart,
- The original student answer sheets,
- The original signed exam cover sheets,
- Two clean copies of the student answer sheets,
- A copy of the RO exam,
- A copy of the SRO exam,
- An RO exam key,
- An SRO exam key,
- A compiled list of student comments and proctor answers.

If you require any additional information or have any questions, please contact Cliff Witherspoon at (864) 873-4330 or Sam Lark at (864) 873-3642.

Sincerely,


Scott L. Batson
Vice President
Oconee Nuclear Station

Attachment (1)
Enclosures (9)

U.S. Nuclear Regulatory Commission, Region II
December 19, 2014
Page 2

cc: Gerald J. McCoy, Chief
U.S. Nuclear Regulatory Commission, Region II
Division of Reactor Safety
Operations Branch
Marquis One Tower
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Mr. Michael Meeks
U.S. Nuclear Regulatory Commission, Region II
Division of Reactor Safety
Operations Branch
Marquis One Tower
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Oconee Nuclear Station
December 2014 (ILT46) Initial License Examination

Question #78

In accordance with NUREG-1021, Operator Licensing Examination Standards for Power Reactors, ES-403, Section D.1.b and c, the facility recommends that the question be deleted from the exam.

Basis:

There are two times referenced in the stem of this question. Initial conditions are provided at Time = 1200 and indicate (among other things) that Core SCM = 0°F and stable. The second time referenced (Time = 1230) makes no mention of Core SCM therefore the candidate must answer questions referenced to Time = 1230 under the condition of Core SCM = 0°F.

Part 2 of the question asks:

If EOP Enclosure 5.6 is being used at 1230, pressurizer level must be at least > (2) inches.

The intent of the question was to ask the Pressurizer level required to start a RCP under the given conditions. However, there is nothing in the question stem that specifically asks about Pressurizer level requirements for starting a RCP, only about Pressurizer level requirements for using Enclosure 5.6 (RCP Restart). Enclosure 5.6 is initiated from the SGTR tab itself based on when a RCP becomes available for restart (IAAT step 90) and depending on where you were in the SGTR tab when the RCP becomes available, Pzr level could be being maintained either between 140" and 180" (in accordance with step 38 of the SGTR tab) or between 100" and 300" (in accordance with step 124 of the SGTR tab).

Step 6 of Enclosure 5.6 states:

Ensure all SCM's are >0°F.

OMP 1-18 (Implementation Standard During Abnormal and Emergency Events) section 5.1.2.D states that:

Steps with numbers or letters are performed in the sequence specified.

OMP 1-18 section 3.5 states that an Ensure step requires that the operator:

Take appropriate action to obtain the specified condition.

Since the verb for step 6 is "Ensure", the operator must take actions to obtain a Core SCM > 0°F to satisfy the requirements of the step before proceeding in the enclosure. Since conditions given in the stem indicate Core SCM = 0°F, the operator can be no further in Enclosure 5.6 than Step 6. Since the Pressurizer level requirements for the RCP restart are provided at Step 8 of Enclosure 5.6, the operator would not have reached the procedural guidance and therefore

Enclosure 5.6 Pressurizer level requirements to start a Reactor Coolant Pump would not apply. This means that the applicable Pressurizer level requirements would have been provided in the SGTR tab. Since insufficient information was given in the stem of the question, there is no way to determine a correct answer without assuming the current step in the SGTR tab which was not provided.

Based on insufficient information being provided to determine the correct answer, Oconee is requesting that this question be deleted from the exam.

Question #99

In accordance with NUREG-1021, Operator Licensing Examination Standards for Power Reactors, ES-403, Section D.1.b and c, the facility recommends that the correct answer for this question be changed from C to D.

Basis:

The stem of this question informs the candidate that while at 100% Reactor Power a Station Blackout occurs concurrent with an RCS leak greater than normal HPI makeup capability (SBLOCA). There are two parts to this question. Based on the following statement in the stem, both parts are answered while waiting on power to be restored to the Unit 1 4160V buses.

While waiting on power to be restored to the Unit 1 4160v buses...

The second part of this question asks:

Rule 2 (Loss of SCM) __ (2) __ required to be performed in parallel with the Blackout tab if ALL subcooling margins indicate 0°F.

Rule 2 is always initiated when SCM reaches 0°F. However, the question does not ask if Rule 2 is "initiated", it asks if Rule 2 is "performed". Under the conditions given in the stem, Rule 2 cannot be performed. With the blackout still in effect, the Reactor will have tripped as well as all Reactor Coolant Pumps will be off due to the loss of power. This means that the operator performs no actions in steps 1, 2, and 3 of Rule 2 when it is initiated. Step 4 and 5 of Rule 2 are as follows:

4. Verify Blackout exists (it does)

5. WHEN power has been restored, THEN continue.

OMP 1-18 (Implementation Standard During Abnormal and Emergency Events) defines WHEN, THEN logic steps as:

WHEN is a hold point in the procedure until the condition is true, at which point the action is taken.

Since step 5 is a WHEN step requiring power to be restored before continuing, the operator must wait at step 5 for power to be restored before performing Rule 2.

With part one of the question not impacted by the availability of 4160v power the correct answer to the first part of the question remains "will NOT" however the answer to the second part of the question is actually "is NOT".

Based on this additional information, Oconee is requesting that the correct answer for this question be changed from C to D.