

NRC ILE Outline and Operating Test Submittal Comments

2014 Prairie Island Nuclear Generating Plant

	Chief Examiner Comment	Facility Action/Response
	Outline Submittal Comments	
Written Exam Outline	Duplicate generic KAs between Tier 3 and other two Tiers: 2.2.44, two on SRO exam; 2.2.38, once on RO, once on SRO.	Lic: Missed the two on SRO, but were aware of the requirement. NRC: Once on each of the exams (ie, RO and SRO) ok. Will accept the two on SRO also.
Written Exam Outline	RO Exam Outline, page 2, SGTR evolution comment for justification of making Rating 2.2* acceptable. Need more explanation of what makes question unique to PRA.	Lic: Will revise comment to reflect why we feel KA Importance Rating less than 2.5 is acceptable and unique for PRA. NRC: Accepted rationale for use of this KA on exam.
Written Exam Rejected KAs	Need more information / justification for rejection of SRO KAs (2 nd , 3 rd , and 4 th).	Lic: Will add more information/justification of why KAs rejected for SRO outline. (2 nd , 3 rd , 4 th) NRC: Additional information/justification adequate to support KA rejection.
JPMs-Admin	2012 contained a Tag-Out, this year there is a Clearance Order. Aren't these the same?	Lic: Did not intentionally make them the same, but did look at them. Will review again and change if necessary. NRC: The JPMs demonstrate different objectives; therefore JPM is not repeated from previous exam.
JPMs-Admin	SRO Emergency Procedure for Notification. This is a bank JPM used in the past; perhaps modify (in the future?) to test the newer HAB procedure that requires SROs to do additional notifications.	Lic: Good idea. Will consider. NRC: This JPM was replaced with a new JPM to demonstrate the applicant ability to implement site security procedure actions for a HAB event.
JPMs-System	Make sure mitigating actions for SWS JPMs j. and d. involve different evolutions.	Lic: Will review again and revise if necessary. NRC: JPM j was replaced with a JPM from a different safety function area.
JPMs ES 301-1	ES 301-1 would be more helpful if included K/A, brief description of task, and what makes JPM SRO vice RO.	Lic: Although not required, will add more task information, KA, and what makes a JPM SRO vice RO as appropriate. NRC: Additional information provided.
JPMs ES 301-2	SRO-U requires all system JPMs have different safety function areas.	Lic: Our review missed that requirement, will revise. NRC: Replacing JPM j corrected the issue
JPMs ES 301-2	Requires at least one in-plant JPM to implement actions required during Emergency/Abnormal conditions	Lic: Did not recognize that requirement, will revise. NRC: Replacing JPM j corrected concern.

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	and <u>another</u> that requires entry into the RCA. Currently have only one in-plant JPM with Emergency/Abnormal conditions that also enters the RCA.	
Scenario ES-D-1	Scenario 2, Event 7; Scenario 4, Event 5: Both events are "Main Turbine Fails to Auto Trip". Are they different events? What makes them different?	<p>Lic: They are same malfunction, but the malfunction occurs under different circumstances in the scenarios (before the major event in one scenario and after the major in the other scenario), and both scenarios are never administered to the same crew (applicants), total of 5 scenarios are being administered.</p> <p>NRC: No revisions required for this comment.</p>

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	RO/SRO Admin JPMs Comments	
RO Admin 1	<ol style="list-style-type: none"> 1. Verify that 5% (allowed error) is $\frac{1}{2}$ of one division on the nomograph (Figure 1) or consider adjusting the allowed error accordingly. 2. Why is 5% error appropriate if the applicant uses the equation? 3. Check the equation given in the note for step 1C12.5 Figure 1(3.); I calculated 3.4 % vs. 34%. 	<p>Lic: The 5% is equal to $\frac{1}{2}$ of one division on Fig. 1, and when the correct values are entered into the formula, the answer is correct.</p> <p>NRC: Concur, JPM is satisfactory as written, no changes required.</p>
RO Admin 2	<ol style="list-style-type: none"> 1. It seems way too basic to <u>just</u> check procedure revisions, especially since we're cueing them that they have an unverified revision of something else! 2. Suggest including this as a part of another critical RO admin task – calculate/verify something meaningful and verify they check revisions (that have important differences so it is a critical task) without cueing. 	<p>Lic: The site procedures require the verification be performed by one of two methods, and this is what the JPM is demonstrating. The specific actions required are not referenced in the 'CUE'.</p> <p>NRC: Concur, JPM is satisfactory as written, no changes required.</p>
RO Admin 3	<ol style="list-style-type: none"> 1. BKR 112J-1 does not even exist on the document provided to the applicant; is the critical step to simply find the typo? It would be more discriminating to find the needed references or determine which of several possible boundaries on a given reference apply. 2. The task is to review the clearance order, not simply find the errors. It is important to document the review properly as well as determine all correct boundaries are proper and complete. 	<p>Lic: The applicant is required to identify the two errors and clarify why the identified issues are in error and if the final boundary isolation is adequate.</p> <p>NRC: Concur, JPM is satisfactory.</p>
RO Admin 4	<ol style="list-style-type: none"> 1. While this is an RO task, it would be far more discriminating if the applicant was required to make decisions or find some of the required 	<p>Lic: The JPM was modified to include the task of completing the Out-of-Service tag and appropriately apply the tag to the equipment removed from service.</p>

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	information to perform the task (rather than just copying information provided by the JPM handouts or the examiner).	NRC: Concur with the modification of the JPM; the JPM is satisfactory as modified.
SRO Admin 1	<ol style="list-style-type: none"> 1. Change cue to <u>just</u> "SWI O-2, Shift Organization, Operation & Turnover," to avoid leading directly to the answer (omit the <u>Table 1</u> reference). 2. Based on the note referred to in SWI O-2, would the off-going Unit 1 Shift Supervisor have to stay until his relief arrived? (Also, SEE BELOW) 3. When does "This SHALL NOT be used for convenience" apply? (If an applicant were to answer that it applies in this case, would they be incorrect? (Both ways cannot be right) 	<p>Lic: The JPM was modified to state that the 'STA' must leave the site, and the reference to Table 1 was removed from the initiating cue.</p> <p>NRC: Concur with the modification of the JPM; the JPM is satisfactory as modified.</p>
SRO Admin 2	<ol style="list-style-type: none"> 1. Per H24.1, App. A, step 6.6.2.C, how does one know if "updating the environmental variables for adverse weather conditions, system conditions or switchyard maintenance" is required? Rather than just cueing that it isn't, how can this be determined by the applicant? 2. What is needed to "Verify the correct in-service equipment alignment is input in EOOS," rather than just cueing that it was verified? 	<p>Lic: Unless stated in the initial conditions, the applicant should not change the variables, and if applicant asks normal condition indications will be provided. The IT personnel will provide the current revision of the in-service equipment line-up for the applicant to verify.</p> <p>NRC: Concur, JPM is satisfactory.</p>
SRO Admin 3	<ol style="list-style-type: none"> 1. Specify how the verification of section 6.3.6 was determined to be complete in the standard. 2. Specify where the Bypass Index and Bypass Locker are in the standard so the examiner can evaluate the applicant's knowledge prior to providing the cues for the critical step. 	<p>Lic: The applicant will require all sections of the form properly filled out prior to approval. The locations of the Bypass Index and Bypass Locker are briefed for the examiner prior to administering the JPM.</p> <p>NRC: Concur, JPM is satisfactory.</p>
SRO Admin 4	<ol style="list-style-type: none"> 1. Are there any records that would be available that the applicant can review to <u>determine</u> if the volunteers have had emergency exposures (versus being told)? This is a critical step. 	<p>Lic: The information must be provided by RP, and the critical portion of the step is for the applicant to request to be informed of any prior emer exposures.</p> <p>NRC: Concur, JPM is satisfactory.</p>

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SRO Admin 5	<ol style="list-style-type: none"> Simply answering the phone does not seem like an evaluative critical step, especially since it just reflects turnover information. Consider having the applicant evaluate the EAL. 	<p>Lic: The JPM was modified to make the proper authentication of the call the critical step, and critical steps were added to implement the Security procedure vs. specifically evaluate the EAL. NRC: Concur with the modification of the JPM; the JPM is satisfactory as modified.</p>
RO/SRO CR/IP System JPMs Comments		
SIM JPM a	<ol style="list-style-type: none"> Though there is a unique malfunction to contend with, most of the critical steps are performed in each scenario. I suggest adding additional issues to be recognized to further differentiate it from the scenarios. 	<p>Lic: This is an ALT PATH JPM which requires the applicant to expressly determine why the rod motion occurred and takes positive action to stop the rod motion. NRC: Concur, this JPM is satisfactory.</p>
SIM JPM b	<ol style="list-style-type: none"> Attachment L is verified in nearly all of the scenarios, so there is low LOD and little discriminatory value to this JPM. I recommend replacing it. 	<p>Lic: This JPM specifically addresses a 'Containment Isolation Failure' which is not included in any of the scenarios. NRC: Concur, JPM is satisfactory.</p>
SIM JPM c	No comments.	
SIM JPM d	No comments.	
SIM JPM e	No comments.	
SIM JPM f	<ol style="list-style-type: none"> Recommend adding conditions/actions to the end of the JPM to require operator action to have the DG pick up some load. 	<p>Lic: By continuing the JPM another step, the applicant is required to verify that the DG actually picks up ~ 150 KW of real load. NRC: Concur, JPM is satisfactory.</p>
SIM JPM g	<ol style="list-style-type: none"> Unlocking a potentiometer, although needed to adjust the gain, does not seem like a highly discriminating critical task. Since there are only 2 critical tasks for this JPM, perhaps a situation that required a decision could be added. Possibly make this an alternate path JPM. 	<p>Lic: The JPM was modified by changing the initial recorded data to require the applicant to verify which Nis are required to be adjusted, when the subsequent calculations in the surveillance are completed. This JPM was not modified to be ALT PATH. NRC: Concur with the modification of the JPM; the JPM is satisfactory as modified.</p>
SIM JPM h	No comments.	
IP JPM i	No comments.	
IP JPM j	No comments.	

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IP JPM k	No comments.	
	Scenario D-1 Comments	
Scenario 1 (1401S)	1. Add another malfunction (there are currently 4, need 5 to 8 per Form ES-301-4). Spare?	Lic: The scenario is adequately challenging as written and will only be used as the 3 rd scenario on one of the crews. Adequate malfunctions already. NRC: Concur, scenario is satisfactory as written.
Scenario 2 (1402S)	1. The same PZR pressure channel failure occurs here as in 1401S, albeit HIGH versus LOW. There is overlap on TS (LCO 3.3.1). Choose another instrument failure.	Lic: None of the crews will see both 1401S & 1402S, so there will not be any overlap between applicants. NRC: Concur, scenario is satisfactory as written.
Scenario 3 (1403S)	No comments.	
Scenario 4 (1404S)	No comments.	
Scenario 5 (1405S)	No comments.	