

2015 Davis-Besse Initial License Operator Examination
Operating Test Review Comments

I. Admin Job Performance Measures (JPM)

A. RO

1. A1.1, Perform Manual RCS Leakage Calculation

- a) Markup the applicable prerequisite steps and section 4.1, as applicable, of the procedure to be provided*
- b) N/A non-applicable portions of the procedure provided.*
- c) Line thru Attachments 1, 3, 7-9.*
- d) Delete Performance Steps (PS) 1 and 2; these are implied when you hand them the procedure.*
- e) If PS 3(1) is critical, then PS 6(4) should be critical*
- f) Correct Typos in PS 5(3) and PS 8(6) Standards - "Initial" should be "Final"*
- g) PS 4(2) and PS 5(3) - Why +/- 250; values are given and no interpretation is required. Even if values are rounded to a whole number, the error is only 9 lbm.*
- h) Evaluate all acceptable value ranges.*
 - (1) PS 12(10) should be +/- 50
- i) PS 15(13) should be critical.*

RESOLUTION: All recommended changes were incorporated.

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2. **A1.2, Determine Maintenance of Active License Status – NO COMMENTS**

3. **A2, Determine Isolation Boundary and Effect on Plant Equipment**

a) *INITIATING CUE – Delete 2nd sentence and replace last sentence with “List isolation boundaries and equipment impacts below.”*

b) *PS 1 and associated STANDARD – add “or equivalent drawing”*

c) *Drawing provided to the applicant must be sized such that it is legible (i.e., larger than 8X11.5).*

d) *Delete PS 2*

e) *PS 9(8) should be critical; the task is to identify the isolation boundaries, not to shut the valve.*

f) *PS 10(9) – Can the plant continue to operate? If not, the STANDARD should be revised to reflect the impact to the plant, not just the MFPs.*

RESOLUTION: All recommended changes, except f), were incorporated. Comment f) discussed with facility, and STANDARD was not changed since a discussion on integrated plant impact would be difficult to standardize.

4. **A4, Emergency Plan Notification of Off-Site Agencies**

a) *INITIATING CUE*

(1) Delete the word “make” from cue.

RESOLUTION: Change made.

(2) On the examiner copy move the note to record the time and hand forms to examinee to before the CUE and revise the first sentence to say “... present time minus 10 minutes ...”

RESOLUTION: Initial condition changed to state that event was declared 5 minutes ago (with time recorded on form) and “Initiating Cue” revised to direct applicant to obtain and review procedure be prepared to make notification in 5 minutes.

b) *PS 3 – clearly identify that the time recorded is the time the first Sheriff’s dispatcher answers the phone and stops the “critical time” clock.*

RESOLUTION: Clarification COMMENT added.

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B. SRO

1. A1.1, Review Manual RCS Leakage Calculation

a) *INITIATING CUE*

(1) Revise 1st sentence of INITIATING CUE to state “A Reactor Operator has performed a Manual Calculation of Leakage Rates per step 4.2 of DB SP-03357, RCS Water Inventory Balance.”

(2) Delete Attachment 3 Data; already recorded in provide procedure.

(3) Change next to last sentence; change calculation to calculations

RESOLUTION: All three comments incorporated.

b) *Markup the applicable prerequisite steps, applicable portions of 4.1, 4.2, and associated attachments that have not been completed.*

c) *N/A non-applicable portions of the procedure provided.*

d) *Line thru Attachments 1, 7-9.*

e) *Delete Performance Steps (PS) 1 and 2; these are implied when you hand them the procedure.*

f) *PS 3(1) – Why +/- 250; values are given and no interpretation is required. Even if values are rounded to a whole number, the error is only 9 lbm.*

g) *PS 4(3) should be +/- 50*

h) *Evaluate all acceptable value ranges.*

i) *PS 5 – Table values for Pzr Steam and Water Inventory have been reversed.*

RESOLUTION: All recommended changes (b through i) were incorporated.

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2. **A1.2, Determine Maintenance of Active License Status – NO COMMENTS**
3. **A2, Perform Risk Assessment – NO COMMENTS**
4. **A3, Emergency Dose Authorization**
 - a) ***PS 4 STANDARD should state that worker SHALL not be used; declared pregnant worker.***
RESOLUTION: Change made.
 - b) ***PS 7 – Does standard include correctly filling out form, conducting the briefing, and signing for RP Manager. What constitutes acceptable completion of form.***
RESOLUTION: Cue revised to document recommendation on the Emergency Dose Authorization Form (YES/NO decision and dose limit). Briefing and signatures are not part of task)
 - c) ***DBEP 204-01 for Mechanic 1 had a box checked. Ensure box is not checked on form to be provided.***
RESOLUTION: corrected.
5. **A4, Emergency Response Organization Notification**
 - a) ***Provide copy of ERO Notification Flow Chart***
RESOLUTION: Flow chart is located in the Emergency Plan Telephone Directory which is provided.

II. Control Room Systems and In-Plant Systems JPMs

A. Simulator

1. **S1, Transfer Control Rod Group 7 from the Auxiliary Power Supply – NO COMMENTS**
RESOLUTION OF VALIDATION COMMENTS: (1) revised task standard to specify actuation of “manual” reactor trip prior to “automatic” trip; and (2) PS 3 reclassified as a “critical step.”
2. **S2, Recover from Letdown Isolation on High Temperature**
 - a) ***INITIAL CONDITIONS – Delete “Purification Demin 1 is in service” OR Revise to say that demin “was in service prior to isolation.”***
 - b) ***Move 1st sentence in INITIATING CUE to INITIAL CONDITIONS***
RESOLUTION: Changes made to address both comments.

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3. **S3, Start Decay Heat Removal Pump 1 Following Loss of DHR – NO COMMENT**

RESOLUTION OF VALIDATION COMMENTS: (1) removed unnecessary CUE from PS 8 and (2) added clarification to evaluator COMMENT in PS 9 (identification of non-applicable of curves)

4. **S4, Actions for a Steam Leak on the Gland Steam Header – NO COMMENT**

RESOLUTION OF VALIDATION COMMENTS: Removed requirement to trip the reactor since initial conditions set plant in MODE 3 (i.e., shutdown); reclassified step (PS 6) to trip reactor as a non-critical step.

5. **S5, Initiate Containment Spray – NO COMMENT**

RESOLUTION OF VALIDATION COMMENTS: removed unnecessary note from Examiner's CUE page.

6. **S6, Transfer Essential 4160 Kv Bus C1 only to Alternate**

a) Why transfer back to NORMAL; end JPM when transfer to Alternate is complete.

RESOLUTION: deleted steps associated with return to NORMAL and removed unnecessary note from Examiner's CUE page.

7. **S7, Exchange RC flow Inputs to RPS Channel 2 – NO COMMENT**

8. **S8, Purge Containment in Mode 5**

a) PS 1 is unnecessary

b) PS-14 Typo step # should be 3.1.11

c) Does not meet the intent of an alternate path JPM. The applicant takes no verifiable action other than direct EO to investigate and reset Freeze Stat.

RESOLUTION: Deleted fan start malfunction and reclassified JPM as non-alternate path. Changes removed all concerns in the stated comments.

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B. In-Plant

1. **P1, Perform Attachment 5 of Control Room Evacuation per DB-OP-02508 – NO COMMENT**

2. **P2, Restore EDG to supply 4160 Essential Bus per DB-OP-02538**

a) *PS 5 – Correct Typo in STANDARD and CUE: D2N05 instead of D2N07*

RESOLUTION: corrected the typo

b) *Are the components manipulated in PS 10 and PS 11 located in the EDG 2 room or vicinity?*

(1) If not what indications are available to indicate EDG 2 is running.

(2) EDG 2 Running cue is not to be provided unless earned.

RESOLUTION: Components are located in EDG room.

RESOLUTION OF VALIDATION COMMENTS: Added pictures of breaker cubicle internals to list of required materials. Revised initial condition statement to include the statement, “loss of all AC”. Reclassified PS 7 as a “critical step” since step requires simulation of the repositioning of a component.

3. **P3, Bypass and Isolate the In Service Air Dryers per DB-OP-02528, IA Malfunctions – NO COMMENT**

III. Simulator Scenarios

GENERAL RESOLUTION COMMENT: Several changes were made to scenarios to incorporate observation made during validation. These changes were editorial in nature (primarily to add clarity).

A. **ES 301-4 – Needs to be updated to reflect scenario changes.**

B. **Scenario 1**

1. **Several Changes to D1**

a) *Steam leak in Containment Replaced with Loss of Letdown*

b) *Overcooling event was modified. Please explain.*

c) *Two post event failures added; one for each RO/BOP*

RESOLUTION: Changes made to focus scenario on overcooling transient rather than the Containment challenge.

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2. **Evaluate if the ATWS a major or simply a component failure?**
RESOLUTION – Changed to component failure for ATC and SRO.

C. **Scenario 2 – NO COMMENTS**

D. **Scenario 3**

1. **Shutting the PORV Block Valve is listed as a CRITICAL TASK at end of scenario but not identified in Event 2**

2. **At what point is not shutting the PORV Block Valve considered unsuccessful?**

RESOLUTION: Shutting the PORV is no longer designated as a CRITICAL TASK.

POST EXAM COMMENT – Should have remained a Critical Task, since failure to complete task significantly impacts the mitigation of the subsequent Steam Generator Tube Rupture.

3. **Venting the Pressurizer is identified as a CRITICAL TASK in Event 8 but is not listed at end of scenario.**

RESOLUTION: Part of CRITICAL TASK to control HP Injection.

E. **Scenario 4 – NO COMMENTS**