

JPM#	1. Dyn (D/S)	2. LOD (1-5)	3. Attributes					4. Job Content Errors		5. U/E/S	6. Explanation (See below for instructions)
			IC Focus	Cues	Critical Steps	Scope (N/B)	Overlap	Job-Link	Minutia		
RO (A1)	S	2	X							E S	<p>1) OP-901-513, Attachment 2, Item 1 – The “Note” has additional conditions that need to be met in order to justify using alternate SFP parameter monitoring. For one, the JPM initial conditions are silent on whether on whether the SFP level can be monitored locally on FHB +46. Also, there are conditions which make this a non-accurate method, and some equipment setup steps that the applicants will probably ask about. Address these in the JPM initial conditions. Added noted conditions to the Initial Conditions of the JPM.</p> <p>2) Is the SFP temperature provided in the initial conditions the current temperature, or the initial temperature when power is lost? Attachment 3 uses initial temperature, and it isn’t clear if these are the same things are not. No change required. Per the licensee, the given temperature will be used in both attachments.</p> <p>3) Does the procedure say that if the SFP initial temperature is in between the provided curves, that the user performs a linear interpolation, or that they pick one or the other closest curves? This could affect the answers that are accepted as correct. Per the licensee, the applicants are taught to interpolate if a parameter is within the curves. The closest curve is used only if a parameter is outside of all the curves.</p>
RO (A2)	S	3	X							E S	Add to the Task Standard that the task needs to be completed in accordance with OP-903-001. The procedure reference has been added to the Task Standard.
RO (A3)	S	3			X					E S	<p>1) Add procedure reference into the Task Standard statement. Procedure reference has been added to the Task Standard.</p> <p>2) It doesn’t make sense that TS 3.6.1.5 is reviewed for compliance, driven by Note 2.0 in OP-903-001, Attachment 11.1. If the average Containment temperature is greater than/equal to 95F, then there is no Action statement entry necessary in TS 3.6.1.5. By the temperature being above 95F, by its nature, it is in compliance with the TS Action statements. Explain the requirement in the procedure. Per the licensee, the Tech Spec required minimum temperature (95F) does not account for instrument inaccuracies if PMC indication is used. Therefore, Note 2.0 in OP-903-001, Attachment 11.1 accounts for this. Therefore, entry into Tech Spec 3.6.1.5 action statements are required.</p>
RO (A4)	S	2			X					E S	<p>1) Does the procedure show what the Waterford 3 TEDE administrative limit is? This reference is needed, as well as to the federal limit, so it can be seen what the applicant has to use to determine an answer. The applicants are taught the administrative limit (GET2 training, lesson plan WLP-OPS-RAD02). Therefore, the applicants should know this without needing a reference.</p> <p>2) Revise the JPM to direct the applicant to calculate the stay time in complete whole minutes. The JPM has been revised.</p>
SRO (A5)	S	3			X					E S	<p>1) The Task Standard needs to state either how many errors there are, or say the applicant identifies the errors shown on the JPM key. Saying the applicant identifies “errors” means an applicant could argue that finding any errors means they pass the JPM. Numbered the errors in the key. Changed the task standard such that it states that the applicant must identify the three errors listed in the key.</p> <p>2) On the Key, Attachment 3 doesn’t show the changes for the LPD CPC Channel Limits. Made more conspicuous with arrows and red font.</p> <p>3) On the Key, Attachment 3, it denotes whether COLR met/not met, and 2.09, 2.10, 2.11 required. Are these items that need to be graded? It isn’t clear. Not required to be graded. Changed the key to make it more obvious. These answers are showing that the answer for the item below it, DNBR within the COLR on any channel, should be answered “Y.”</p>

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SRO (A6)	S	3				X				E S	Add information into the Task Standard to tie it to the specific surveillance in the cited procedure. Added the procedure to the task standard.
SRO (A7)	S	2								S	
SRO (A8)	S	1								U S	1) If performance of this task includes providing the applicant the emergency radiation exposure guidelines procedure, all an SRO applicant has to is compare the calculated dose to the max dose allowed. The dose calculation is RO level of knowledge in itself. While this is a SRO task, the total content of the JPM is not discriminatory. 2) For this to count as significantly modified, a change to the conditions needs to have some different affect on the outcome the applicant is assessing. The dose and dose rate are changed from the Bank JPM, but there is no change in the outcome. It doesn't appear it can qualify as being called significantly modified. A new administrative JPM was created to replace this one. It is satisfactory.
SRO (A9)	S	3		X	X					E S	The Critical Step says that an Alert (FA1) can be declared based on EAL RCB2 or RCB3. With the information provided to the applicant, RCB3 is justified with the SI. However, there isn't information available to determine if a loss/potential loss of the RCS barrier for RCB2 has occurred. A SGTR is typically isolable, so it doesn't count as a Potential Loss. Second, there is no indication as to what the Sub-Cooling Margin is, so a Loss of Barrier cannot be determined. Based on the information provided, the Critical Step is in error. Waterford 3 does not treat a SGTR as isolable in the EALs. In the EAL Bases it describes a isolable leak as a CVCS leak, saying that declaring the RCB3 EAL "is consistent with the RCS leak rate barrier Potential Loss EAL." Since it is unisolable, use of SGTR as basis for RCB3 is justified.
Other Follow Ups											1) VERIFY that JPM repeating from previous two exams (A7) was not on the SRO-U applicants' RO exam (2012 NRC Exam). None of the upgrades in the 2015 SRO exam were participants in the last two NRC exams (2012 or 2014).

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- Determine whether the task is dynamic (D) or static (S). A dynamic task is one that involves continuous monitoring and response to varying parameters. A static task is basically a system reconfiguration or realignment.
- Determine level of difficulty (LOD) using established 1-5 rating scale. Levels 1 and 5 represent inappropriate (low or high) discriminatory level for the license being tested.
- Check the appropriate box when an attribute weakness is identified:
 - The initiating cue is not sufficiently clear to ensure the operator understands the task and how to begin.
 - The JPM does not contain sufficient cues that are objective (not leading).
 - All critical steps (elements) have not been properly identified.
 - Scope of the task is either too narrow (N) or too broad (B).
 - Excessive overlap with other part of operating test or written examination.
- Check the appropriate box when a job content error is identified:
 - Topics not linked to job content (e.g., disguised task, not required in real job).

- Task is trivial and without safety significance.
5. Based on the reviewer's judgment, is the JPM as written (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory?
 6. Provide a brief description of any U or E rating in the explanation column.
 7. Save initial review comments as normal black text; indicate how comments were resolved using [blue text](#) so that each JPM used on the exam is reflected by a (S)atisfactory resolution on this form.

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S1	D	2				X				ES	<p>NUREG-1021, Appendix C, Section B.3, second paragraph, says that JPMs can test knowledge of immediate actions. However, it also says that JPMs should not solely test actions known from memory. The proposed JPM tests solely immediate actions, so the scope of the JPM has to be expanded. One option is to provide one dropped rod that the applicant implements the abnormal procedure for. After completing verifiable actions there, the second control rod can drop. Then, performance of the immediate actions with the alternate path can take place.</p> <p>Added a task to the JPM. The applicant will insert CEA #79 in the manual individual mode approximately 2 to 4 inches for I&C post maintenance testing. Also, added content to the critical tasks to point out that if they are not performed, then an unnecessary SAE declaration would be required.</p>
S2	D	3	x		X					ES	<ol style="list-style-type: none"> 1) Examiner notes are needed to explain what conditions or cues are needed if the applicant does not make the calls to the local operator to operate equipment. No cues are required because if a local action is not performed, there will be no flow to the HPSI header when a charging pump is started. If a call is not made, the examiner should let the applicant proceed through the procedure. Updated the JPM text. 2) What is(are) the indications of charging pump flow? Since establishing flow is part of the Task Standard, the JPM needs to document what the indications are, and what flow is acceptable. Added indications that the applicant may use that charging flow is established once a charging pump is started. The charging pumps are positive displacement pumps that deliver 44 gpm. Added to the JPM that the required flow is approximately 40 gpm. 3) The Examiner cues say that the applicant may ask the CRS which charging pump to start. Based on the plant conditions, would there be one that is preferable for specific reason? There is no preferable charging pump to start. Charging pump B was picked at random. 4) The initial conditions are in Mode 3. This can be categorized as a Low Power/Shutdown (L) JPM on the Form ES-301-2. Updated the ES-301-2 to include this JPM as Low Power (RO only).
S3	D	3								ES	<p>Add a reference to procedure OP-901-131 in the Task Standard. Added OP-901-131 to the Task Standard.</p>
S4	D	2				X				ES	<p>Same comment as on JPM S1. All of the actions marked are immediate operator actions. If these are required to be known from memory by the applicants, then additional content is needed in the JPM. Potentially, the applicant starts doing another task, and then, indications of fire drive him/her to perform these immediate actions.</p> <p>This JPM has contingency actions to take due to an ADV spurious opening. This JPM is not based solely on memory or immediate actions because the applicant must determine an ADV has spurious opening by checking S/G pressure and ADV position.</p> <p>When the procedure steps say “verify,” does the applicant have the procedural ability to make sure that the equipment being verified can be manipulated to put it in the desired</p>

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											state? Can they “ensure” that it is in a certain state? What procedure give them the ability to do this? UNT-005-034, “Communications Affecting Plant Operation (Rev. 7),” defines “Verify” as the following: “To take actions to guarantee component status is as specified.”
S5	D	3								E S	Reference the procedure used in the Task Standard. Referenced the procedure in the task standard. Will obtaining the key from the cabinet cause an overlap with the other applicant performing S7 at the same time? No, there is one key that operates four channels. Therefore, only one trip to the key locker is required. No issue of overlap during validation.
S6	D	3								S	
S7	D	3	X							E S	<ol style="list-style-type: none"> 1) This is proposed to be performed in parallel with JPM S5. The initial conditions state that the plant is in Mode 3 and stable. The initial conditions for S5 are that an ESDE is in progress. Since this isn’t stable, are the initial conditions going to work together? Changed the initial conditions in S5 to indicate that an ESDE had occurred but is now isolated. Conditions are stable and the JPMS do work together. Also, changed the description to indicate that the ESDE is no longer occurring. 2) Add an answer key to the JPM so that the evaluators can ensure that the correct values are captured by the applicant. Answer key has been added to the JPM. <p>Based on validation, made changes to what Startup Channel indicated in the simulator. The way it was, it may cause an applicant to take a different path through the JPM at Step 7.2.10 in the procedure. Simulator setup was changed, and the JPM was re-validated. No issues.</p>
S8	D	3	X							E S	<ol style="list-style-type: none"> 1) In the Task Standard, indicate what the correct procedure would be the applicant would use to accomplish the task. Added the required procedure to the task standard. 2) The initial conditions are in Mode 3. This can be categorized as a Low Power/Shutdown (L) JPM on the Form ES-301-2. Changed the Form ES-301-2 for the ROs. 3) Address the Caution statement contingencies/Procedure Precautions in the JPM’s applicant cue sheet. Added to the initial conditions, “No painting, or fire or chemical release is occurring in the FHB.” <p>During validation, a conflict in the indications shown in the simulator for some of the FHB ventilation dampers was discovered. There was an existing Discrepancy Report the simulator had on file for this issue. Licensee staff made the simulator changes necessary to address this issue, and the JPM was re-validated. No further issues.</p>
P1	D	2				X				E S	<p>If the Air Side Seal Oil pump is verified running or not locally, what indications are available for the applicant to verify its status? What should they read? Updated the JPM to provide more indications in the cues and notes.</p> <p>There are two verifiable actions in this JPM. More steps may need to be added to make</p>

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											<p>this discriminating. Will evaluate during validation.</p> <p>The applicant is required to traverse to three different locations on the TGB +40 to complete the task. This is a new task based on the latest revision to the EOPs (revised 2/15) to maximize TBG battery life. Based on validation, this JPM is acceptable.</p> <p><u>Procedure question</u>: If the air side seal oil D/P is outside of 10 to 14 psid, per procedure, what does an operator do? There is no contingency in the procedure. The applicant would be expected to call the control room stating that the air side seal oil pump is operating but not meeting D/P required by procedure.</p> <p><u>Procedure/Nameplate Issues</u>: The control switch label for the “Air Side Seal Oil Backup Pump (DC)” at the Hydrogen Control panel is not labeled as this in the plant. It is labeled “Back Up Pump Motor Control.” Also, the “Seal Oil DP” gage in the procedure is labeled “Air Side Seal Oil/Gen Gas DP.” Will enter in condition report following the exam.</p>
P2	D	3	X							E S	<ol style="list-style-type: none"> 1) Add the action in Step 8.7.3 to the Task Standard. Otherwise, an applicant that doesn't do this could argue that he/she completed the task standard. Added that the applicant will “trip the Standby Fuel Oil Booster Pump in accordance with OP-009-002, ‘Emergency Diesel Generator’” to the task standard. 2) Add cues that indicate what change in indications are expected when the Standby Fuel Oil Booster Pump is secured. Indications were added to the JPM. 3) Where will the fuel oil leak be? Can it be in the same room? Any precautions the applicants would need to take if this was for real? The fuel oil leak would be in the same room but should be contained in a diked area. No additional procedural precautions required by the applicant. Increased situational awareness if the event was real would be expected.
P3	S	3				X				E S	<ol style="list-style-type: none"> 1) Steps 3.b. and 4.b.: All of the breakers associated with MCC-314A(B) non-safety loads need to be listed so that the examiner can verify that the associated critical task is complete. Added nomenclature and breaker numbers for all non-safety side breakers on the 314-A and 314-B busses. 2) <u>Procedure note</u>: If the equipment labels don't match the procedure, this needs to be corrected. Enter it in a condition report for correction after the exam. During validation, it was discovered that some of the breaker tags in the JPM did not match. They were identified, and are corrected in the JPM. This will be evaluated to see if the procedure needs a condition report issued. 3) Adjust the critical steps and task standard based on the changes made for 1) and 2). Changes made.

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WT – 2015 - 09										DRAFT OPERATING TEST COMMENTS	SCENARIOS
Scenario Set	1. ES	2. TS	3. Crit	4. IC	5. Pred	6. TL	7. L/C	8. Eff	9. U/E/S	10. Explanation (See below for instructions)	
1		X	X						E S	<ol style="list-style-type: none"> 1) Event 3: Where are the actions taken to address TRM 3.3.5? Added additional text to address what is required by TRM 3.3.5 in the D-2. 2) Event 8: Is there a critical task associated with restoring inventory control in the Functional Recovery Procedures? After discussion, a critical task was added. Omission of applicant action in this case would result in a challenge to the inventory control safety function. 	
2			X						E S	<ol style="list-style-type: none"> 1) Event 2: State that after the charging pump alignment changes, the crew will still be in the TRM 3.1.2.4 Action statement. The statement is in the D-1 and on page 6 of the D-2. 2) Event 4: How much time can elapse after the TCW pump trip before there is a turbine trip/reactor cutback? Add this to the Examiner Notes. Added to the examiner notes that after 2-3 minutes a RXC may occur due to significant damage to the turbine. This is from the Loss of TCW off-normal procedure. 3) Event 4: Examiner Note – What procedure gives the operator authorization to manually start the backup TCW pump? Expect it is a conduct of operations procedure, but please specify. Added to the Examiner notes that the crew is expected to take manual control of a system/component if the automatic feature of the component has malfunctioned. Guidance is in EN-OP-115, "Conduct of Operations," Section 5.4[2]. 	
3		X	X						E S	<ol style="list-style-type: none"> 1) Event 4: What defines an OPERABLE CCW train? The Tech Spec and its bases do not specify what this is. TS 3.7.3 states that two operable CCW trains are required. The definition of operable is defined in TS 1.17 and OP-100-010, "Equipment Out of Service." In this case, all necessary electrical power is not available. The AB bus is aligned to train B in this scenario. So, both available CCW pumps require train B power, which does not met the redundancy of electrical power requirements. TS requirements for this event is defined in the D-2. 2) Event 5: Depending on how the applicant crews handle this, it may result in initiating a reactor trip. Need to plan for the contingency to cue Events 6 and 7 if this happens. This was discussed during validation. The examiners will be cognizant of this situation, and the contingency has been planned for. 3) Event 6: For Critical Task 2, data will need to be collected in the simulator booth showing how each crew stabilized RCS pressure within the Pressure/Temperature limit curves. Data will be collected in the simulator to support this. 4) Event 6: Add a Critical Task for isolating the S/G associated with the steam line break. Critical Task was added to the scenario 	
										<p><u>Other Issues:</u></p> <ol style="list-style-type: none"> 1) Forms ES-301-5 and -6: Not filled out correctly. Review NUREG and give direction on revision. Designed to show the transient and event totals for each applicant type. The RO applicants are applying for a RO license, not an ATC or BOP license. It is meant to show that each applicant's scenarios meet the 	

											<p>minimum attributes for a valid test. Revise. Revised forms were submitted and comments resolved.</p> <p>2) Contingency: If the Spare scenario has to be run, then we will need licensed SROs to fill the role as surrogates. If this occurs, at least two members of the training staff are licensed SROs. One of them will be used as a surrogate.</p> <p>3) Generic comments from validation: Spell out the Tech Spec action requirements with Action Statement entries. Also, place the label identification for each switch that the applicant is supposed to operate in the D-2's. These issues were addressed in the revised scenarios provided after validation.</p>
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1. ES: ES-301 checklists 4, 5, & 6 satisfied.
2. TS: Set includes SRO TS actions for each SRO, with required actions explicitly detailed.
3. Crit: Each manipulation or evolution has explicit success criteria documented in Form ES-D-2.
4. IC: Out of service equipment and other initial conditions reasonably consistent between scenarios and not predictive of scenario events and actions.
5. Pred: Scenario sequence and other factors avoid predictability issues.
6. TL: Time line constructed, including event and process triggered conditions, such that scenario can run without routine examiner cuing.
7. L/C: Length and complexity for each scenario in the set is reasonable for the crew mix being examined, such that all applicants have reasonably similar exposure and events are needed for evaluation purposes.
8. Eff: Sequence of events is reasonably efficient for examination purposes, especially with respect to long delays or interactions.
9. Based on the reviewer's judgment, rate the scenario set as (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory.
10. Provide a brief description of problem in the explanation column.
11. Save initial review comments as normal black text; indicate how comments were resolved using **blue text** so that each JPM used on the exam is reflected by a (S)atisfactory resolution on this form.