

**Fermi 2015 Operating Test Comments**

Administrative JPMs

<b>Comments</b>	<b>Response</b>
RO Admin JPM 4101.450	
Data Sheet provided (2400.000.02) has adverse trending (drifting). Drifting does <u>not</u> result in failing an acceptance criterion. Need to fail an surveillance Acceptance Criteria!!	
Data Sheet (Example) appears to have readings that do <u>not</u> meet acceptance criteria. Which one of these sheets is to be provided to the applicants?	
This JPM only has one error. Suggest that RO applicants also perform Section 4 of Surveillance procedure. Section 4 should have any error also. (It would probably be an easy error to identify, but must have more than one error!)	
Provide applicant with Cue Sheet #2 only after they show examiner where T23-800 indicator is located!	
Why are JPM steps 1, 2, 4, 5, 6, & 7 marked as critical (verify or Sat steps)?	
Why are you providing Cue Sheet 3 to the applicants? These are the answers!! Have applicants explain to the examiner what they identified rather than the other way around! Any cue provided by the examiner here would be the CARD number (even this is optional, so long as the applicants mention they need to write one!).	
SRO Admin JPM 4101.449:	No comments.
<b>SRO/RO Admin JPM 4101.408</b>	
If steps 3, 4, & 5 are critical, you may want to include a band for correct answers, (ie: $133.9 \pm .1^{\circ}\text{F}$ ), otherwise, a rounding error could result in a failed JPM!	During OV, this was not an issue, and the licensee found that only a <u>final</u> error band was desirable.
Why is this JPM given to SRO applicants also? Is this surveillance performed by SRO's in the plant? May want to add a question for SRO applicants only; "If this surveillance was completed unsat, what restrictions (Tech Specs) apply?"	During OV, this was not an issue and sufficient SRO-only tasks were identified without modifying this specific JPM.

SRO/RO Admin JPM 4101.418	No comments
<b>SRO/RO Admin JPM 4101.403</b>	
In the Initiating Cue, do not tell the applicant the area is a	During OV, this was not found

locked high rad area and contaminated area. Instead provide the applicant a rad map of the area of concern. Have the applicant make the decision for the type of radiation area and suiting requirements. Suggest the rad map include a room with high contamination area and high radiation outside the job work area. Add a step to have the applicant determine the path from the room entrance to the work area (avoiding the high radiation area for ALARA purposes) and have applicant explain: a. briefing requirements; b. dosimetry requirements; c. protective clothing to wear; d. respiratory requirements; e. RP coverage requirements. Better yet, can you do this JPM in a rad mock-up area?	to be an issue and discriminating tasks were identified without modifying the JPM. Also, the need for an additional reference (MWC15 – Elevated Risk Management) was avoided by stating that the area was <800 mrem.
<b>RO Admin JPM 00001.403</b>	Fill Out Notification Form
I assume the applicant gets wind direction and speed from an indicator in the simulator?	Handout
<b>SRO Admin JPM 0001.401</b>	No comments

#### In-Plant JPMs

<b>IP JPM 3006.305</b>	No comments
<b>IP JPM 0272.401</b>	
(OV) There needs to be more detailed actions for contacting the MCR, etc. when the alternate path begins due to lack of proper response.	Provided in NOTE.
Delete 2 <sup>nd</sup> bullet from Initiating Cue since the applicant will probably read the cue sheet elsewhere in the plant!	Kept bullet to expedite entry into appropriate room.
Are steps 1 & 2 of the JPM really critical if they are not successful?	Not by our criteria, however, there are sufficient “actual” critical steps, so if the licensee chooses to treat these additional steps as critical, the exam remains acceptable.
Should there be a cue <u>after</u> step 2 stating that there is no sound of CO2 emission? Cue <u>after</u> step 3 should read “Breaks glass”. The cue <u>before</u> step 4 has you give cue that lever indicates open <u>before</u> the step that the applicant positions the lever to OPEN!! (Cues in this JPM are <u>before</u> the step rather than <u>after</u> the step!)	Discussed at OV. This was done to address previous concerns and can be properly handled now that the examiners have become familiar with the format.
<b>IP JPM 2001.216</b>	
<ol style="list-style-type: none"> <li>1. Explain how this is an alternate path JPM. Step B.5 is performed independent of whether the RPS Scram White lights are on or off!</li> <li>2. Step 2 contained multiple actions; Obtain keys and place Mode Switches out of OPER.</li> </ol>	<ol style="list-style-type: none"> <li>1. True, however, Step <u>C.1</u> is required to be performed (from a picture) <u>IF</u> unable to SCRAM the reactor.</li> <li>2. Separated into 2 steps.</li> </ol>

Simulator JPMs

S JPM 0110-406	
Suggest that applicant be able to move the first control rod at least one step before putting in the malfunction.	
Steps 11 & 17 (Standard Column), delete 'insert' since the applicants should be withdrawing control rod for this JPM.	
How are steps 13 & 14 critical if rod does not move?	
<b>S JPM 0118-002</b>	
(OV) Step 4 needed to be revised to refer to the East (vs. West) SBFW pump.	Correction made.
Second Cue seems unnecessary. Applicant should be able to 'navigate' alternate path without assistance from the examiner.	No assistance is provided – direction is given only IF recommended.
<b>S JPM 0105-402</b>	
Is it necessary to give the 2 <sup>nd</sup> cue? Wouldn't the applicant be able to determine if C71A-K3E was deenergized without the cue? (This is one of the better JPM's I've seen!)	Worked well at OV – no changes required.
<b>S JPM 0140-409</b>	
This is not the same JPM listed on Form ES-301-2, 'd'. Need to correct Form ES-301-2.	Contacted licensee to revise ES-301-2, but also to verify that the JPM is an adequate replacement as well.
<b>S JPM 0119-002</b>	No comments.
<b>S JPM 0158-401</b>	No comments.
<b>S JPM 0172-001</b>	Typo on P8000- <del>RC</del> 002?

<b>S JPM 0150-402</b>	
Cue after step 5 tells applicant to manually shift CCHVAC to RECIRC. This should not be prompted by the examiner, the applicant should know to do this. Delete last sentence in this cue and replace with, "When applicant determines that procedure 23.413 is needed to shift CCHVAC, provide applicant a copy of 23.413.	Agreed. The "CRS" will only direct the applicant to perform those actions recommended by the applicant.

<b><u>Scenario #1</u></b>	
(OV) D-1 sheets were requested with scenarios (D-2) provided to the examiners.	D-1 sheets were provided.
Should have criteria for ending the scenario.	Provided criteria.
<b><u>Scenario #2</u></b>	
(OV) D-1 sheets were requested with scenarios (D-2) provided to the examiners.	D-1 sheets were provided.
Critical Task on Pg 14: What criteria exceeded requires spraying the drywell? Should have applicant control DW pressure rather than relying on SRO say so!	The Critical Task List on the last page of scenario guide provides a summary of CTs and their criteria.
Should have criteria for ending the scenario. (ie: controls DW pressure, commence flooding up drywell, etc.)	D-1 sheets were provided.

Note: List critical tasks and failure criteria with each scenario.