



Nebraska Public Power District

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NLS2015139
December 14, 2015

Thomas J. Farina
Chief Examiner, Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Subject: Initial Post-Examination Documentation
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Reference: NUREG 1021, Operator Licensing Examination Standards for Power Reactors,
Revision 10

Dear Sir:

The purpose of this correspondence is to submit to the Nuclear Regulatory Commission (NRC) Region IV offices post-examination documentation resulting from the Reactor Operator and Senior Reactor Operator initial licensing examinations, which were administered at Cooper Nuclear Station (CNS) on December 8, 2015.

The following post-examination documentation required by Section ES-501, C.1.a per the reference, is enclosed:

- the graded written examinations (i.e., each applicant's original answer and examination cover sheets) plus two clean copies of each applicant's answer sheet (ES-403, "Grading Initial Site-Specific Written Examinations");
- master examination(s) and answer key(s) (ES-402, "Administering Initial Written Examinations," and ES-403);
- questions asked by and answers given to the applicants during the written examination (ES-402);

Enclosures 1, 3, and 6 transmitted herewith contain Personally Identifiable Information. When separated from enclosures 1, 3, and 6, this transmittal is decontrolled.

COOPER NUCLEAR STATION

P.O. Box 98 / Brownville, NE 68321-0098
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- written examination seating chart (ES-402);
- completed Form ES-403-1, “Written Examination Grading Quality Checklist” (ES-403 and Section D.1);
- written examination performance analysis (ES-403);
- completed Examination Security Agreement (Original Forms ES-201-3);
- condition reports and procedure change requests.

Additionally, per your request, we are enclosing two scenario videos on one DVD to verify your information technology capabilities to review the format of the videos.

There were no changes required to the master examination or answer key during the administration or grading of the examination; additionally, there were no substantive comments made by the applicants after the written examination.

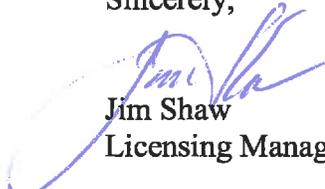
We request the NRC to withhold Enclosure 1, Enclosure 3, and Enclosure 6, from the public document room per 10 CFR 2.390.

We request the NRC to withhold the master examination and examination key (Enclosure 2) from the public document room for two years from the date of the exam.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact me at (402) 825-2788, Michael Maness, Operations Initial Training Superintendent, at (402) 825-5402, or Ed Jackson, Operations Training Nuclear Instructor (Examination Lead), at (402) 825-5710.

Sincerely,



Jim Shaw
Licensing Manager

/jo

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Enclosures:

1. Graded Written Examinations
2. Master Examination and Answer Key
3. Questions Asked and Answers
4. Written Examination Seating Chart
5. Written Examination Grading Quality Checklist
6. Written Examination Performance Analysis
7. Completed Examination Security Agreement
8. Condition Reports and Procedure Change Requests
9. Scenario Recordings (one DVD)

cc: Training Manager w/o encl
Cooper Nuclear Station

Operations Initial Training Superintendent w/o encl
Cooper Nuclear Station

CNS Records w/o encl

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ILT 2014 NRC Written Exam

Analysis

1. 6 Questions ≥ 50 missed.
2. Knowledge deficiencies identified for the following:
 - Procedure 5.1RAD entry conditions.
 - The lowest DW pressure which will exceed PCPL-A with high PC water level.
 - Where the RCIC Steam Supply line drains are routed to during normal plant operation.
 - Location of RHR system orifices.
 - The impact of manually operating Torus to Drywell and Reactor Building to Torus vacuum breakers on primary containment and reactor building pressures.
3. No substantive changes.

Chief Examiner's Note:

Question 10: 60% missed - chose C

Question 11: 60% missed - chose A (2) / D (1)

Question 38: 80% missed - chose D

Question 56: 80% missed - chose C

Question 59: 60% missed - chose B

Question 65: 60% missed - chose A (2) / D (1)

Licensee determined all 6 questions represented applicant knowledge deficiencies which were remediated. Attached reference questions redacted, can be found in Final Written Exam file (ML15351A357).



Nebraska Public Power District

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NLS2015142
December 15, 2015

Thomas J. Farina
Chief Examiner, Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Subject: Operating Examination In-Plant Job Performance Measure Task Standard
Cooper Nuclear Station, Docket No. 50-298, DPR-46

Dear Sir:

The purpose of this correspondence is to submit the results of a post-evaluation of In-Plant Job Performance Measure (JPM) Number 1, "Startup RPS MG Set A (Alternate Path)" which was administered at Cooper Nuclear Station (CNS) during the week of November 30, 2015. This post-evaluation determined that the Task Standard associated with this JPM is incorrect.

The Task Standard states "On completion of this JPM, the applicant started and, then, shuts down RPS MG Set A after determining voltage cannot be maintained within the required operating band without adjusting the potentiometer."

During the performance of the JPM, Procedure 2.2.22, Step 5.1.3.1 is preceded by a CAUTION statement, "VOLTAGE ADJ potentiometer setting shall not be adjusted unless it is known that setting has been changed while RPS MG Set A was shut down." This caution statement is only applicable to step 5.1.3.1, which checks the VOLTAGE ADJ potentiometer at approximately midpoint position which does not preclude operation in Step 5.1.3.5 that directs adjusting A-C VOLTS if not between 114V to 126V following motor start.

Cooper Nuclear Station's Procedure Writer's Guide provides guidance defining a CAUTION statement: "A statement placed immediately before applicable step(s) that informs users of undesirable equipment results such as potential for equipment damage, plant transients, or conditions that may adversely affect plant operation."

Per this guidance, the placement of this CAUTION statement in Procedure 2.2.22 is inappropriate. Operating the VOLTAGE ADJ potentiometer at this point of the procedure has no impact on the potential for equipment damage, plant transients, or conditions that may adversely affect plant operation.

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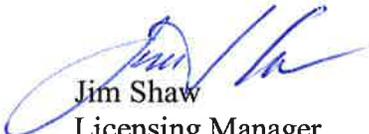
The Task Standard should be revised to state "On completion of this JPM, the applicant started and, then, shuts down RPS MG Set A after determining voltage cannot be maintained within the required operating band," removing the statement "without adjusting the potentiometer."

A procedure change request has been initiated to eliminate the CAUTION statement and replace with steps to direct "If VOLTAGE ADJ potentiometer setting has been changed while shutdown, then place the potentiometer at approximately the midpoint position."

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact me at (402) 825-2788, or James Florence, Simulator Supervisor, at (402) 825-5700.

Sincerely,



Jim Shaw
Licensing Manager

/jo

cc: Training Manager
Cooper Nuclear Station

Operations Initial Training Superintendent
Cooper Nuclear Station

CNS Records

12/15/2015

MEMORANDUM

From: T.J. Farina

To: NRC Reviewers

Subj: Cooper Nuclear Station Request for Post-Exam Change to JPM P-1

Cooper Nuclear Station is requesting a change to the task standard for JPM P-1, which was administered on Dec 3. The task involves starting an RPS MG Set which had been secured for maintenance. Once the MG Set is started, voltage cannot be stabilized and the applicant is expected to secure the MG Set (alternate path).

The approved task standard reads:

“On completion of this JPM, the applicant started and, then, shuts down RPS MG Set A after determining voltage cannot be maintained within the required operating band without adjusting the potentiometer.”

The requirement that the applicant not manipulate the voltage adjustment potentiometer is based on a caution statement prior to Step 5.1.3.1 of procedure 2.2.22, which reads:

“Caution – VOLTAGE ADJ potentiometer setting shall not be adjusted unless it is known that setting has been changed while RPS MG Set A was shut down.”

The JPM was written with the understanding that this caution applied to all substeps under 5.1.3 (steps 5.1.3.1 through 5.1.3.6), and that the applicant therefore should not manipulate the potentiometer at any point in the JPM. However, post-administration, the licensee has stated that this caution only applies to the substep immediately following it, 5.1.3.1, and that when the applicant identifies that AC Voltage is out of tolerance in step 5.1.3.5, he is in fact permitted to manipulate the VOLTAGE ADJ potentiometer.

Please review the enclosed materials, and provide a recommendation regarding Cooper Nuclear Station’s request to modify the JPM. The TAC for this exam is X02547.

Regards,

T.J.

RESOLUTION

On 12/16/2015, Region IV examiners Clyde Osterholtz and John Kirkland formed a post-exam review panel, and concurred with the licensee’s recommendation to remove the phrase, “without adjusting the potentiometer” from the approved JPM P1 Task Standard. The final JPM will be revised accordingly.
[TJF]

4.2.12.3 Inform Shift Manager PCIV RWCU-MO-18 is returned to service (LCO 3.6.1.3).

4.2.13 IF Reactor Building HVAC Isolation was bypassed, THEN restore from Operation of Reactor Building Ventilation with RPS Panel 1B de-energized per Procedure 2.2.47.1.

4.2.14 Reset PCIS Isolations per Procedure 2.1.22.

5. PLACING RPS MG SET IN SERVICE

5.1 Place RPS MG Set A in service by performing following:

5.1.1 At REACTOR PROTECT SYS MOT AND GEN SET #1A CONTROL CUBICLE (RPS MG Set Room A), perform following:

5.1.1.1 Ensure AC OUTPUT GEN breaker is OFF.

5.1.1.2 Ensure AC INPUT MOT breaker is OFF.

5.1.2 At MCC-L (Control Building 882'), ensure Breaker 3D, RPS-MG-RPSA, REACTOR PROT SYS A MOTOR GEN SET, is closed.

5.1.3 At REACTOR PROTECT SYS MOT AND GEN SET #1A CONTROL CUBICLE, perform following:

CAUTION – VOLTAGE ADJ potentiometer setting shall not be adjusted unless it is known that setting has been changed while RPS MG Set A was shut down.

5.1.3.1 Check VOLTAGE ADJ is at approximately midpoint position.

5.1.3.2 Close AC INPUT MOT breaker.

5.1.3.3 Press MOTOR ON button for ~ 15 seconds to allow MG Set to come up to speed and release when A-C VOLTS are > 110V.

5.1.3.4 Check A-C VOLTS have stabilized between 114V and 126V.

5.1.3.5 IF A-C VOLTS are not between 114V to 126V, THEN perform following:

a. Loosen VOLTAGE ADJ potentiometer locking screw.

b. Make small increment adjustments to VOLTAGE ADJ potentiometer until voltage is in this band.

c. Tighten VOLTAGE ADJ potentiometer locking screw.

d. IF voltage cannot be adjusted to within this band, THEN remove RPS MG Set A from service per Section 11 and inform Electricians.

5.1.3.6 IF yellow OVERVOLTAGE light is on, THEN turn off light by pressing MOT ON button.

Procedure Revision

IDOC # 69660

4.2.12.3 Inform Shift Manager PCIV RWCU-MO-18 is returned to service (LCO 3.6.1.3).

4.2.13 IF Reactor Building HVAC Isolation was bypassed, THEN restore from Operation of Reactor Building Ventilation with RPS Panel 1B de-energized per Procedure 2.2.47.1.

4.2.14 Reset PCIS Isolations per Procedure 2.1.22.

5. PLACING RPS MG SET IN SERVICE

5.1 Place RPS MG Set A in service by performing following:

5.1.1 At REACTOR PROTECT SYS MOT AND GEN SET #1A CONTROL CUBICLE (RPS MG Set Room A), perform following:

5.1.1.1 Ensure AC OUTPUT GEN breaker is OFF.

5.1.1.2 Ensure AC INPUT MOT breaker is OFF.

5.1.2 At MCC-L (Control Building 882'), ensure Breaker 3D, RPS-MG-RPSA, REACTOR PROT SYS A MOTOR GEN SET, is closed.

5.1.3 At REACTOR PROTECT SYS MOT AND GEN SET #1A CONTROL CUBICLE, perform following:

DELETE CAUTION

CAUTION — VOLTAGE ADJ potentiometer setting shall not be adjusted unless it is known that setting has been changed while RPS MG Set A was shut down.

5.1.3.1 If VOLTAGE ADJ potentiometer setting has been changed while shutdown, then place the potentiometer at approximately midpoint position.

5.1.3.2 Close AC INPUT MOT breaker.

5.1.3.3 Press MOTOR ON button for ~ 15 seconds to allow MG Set to come up to speed and release when A-C VOLTS are > 110V.

5.1.3.4 Check A-C VOLTS have stabilized between 114V and 126V.

5.1.3.5 IF A-C VOLTS are not between 114V to 126V, THEN perform following:

a. Loosen VOLTAGE ADJ potentiometer locking screw.

b. Make small increment adjustments to VOLTAGE ADJ potentiometer until voltage is in this band.

c. Tighten VOLTAGE ADJ potentiometer locking screw.

d. IF voltage cannot be adjusted to within this band, THEN remove RPS MG Set A from service per Section 11 and inform Electricians.

- 3.2 Action © - An instruction written in active voice that directs the user to perform an action, and contains an action verb and an object.
- 3.3 Action Verb - A verb that directs the action within a step to be taken by the performer.
- 3.4 Administrative Procedure - A document that specifies requirements and actions necessary to implement a program or process. These are typically referred to as Information Use procedures. See the definition of Procedure for additional details.
- 3.5 Attachment - Information separated from the main body of the procedure used in the performance or understanding of a procedure such as graphs, figures, tables, sketches, and forms.
- 3.6 Bases - The source of information for or the rationale behind procedure step(s) or sequence of steps.
- 3.7 Branching - A step that directs the user to other steps or sections in the same or another procedure and the user does not return to the original step.
- 3.8 CAUTION - A statement placed immediately before applicable step(s) that informs users of undesirable equipment results such as potential for equipment damage, plant transients, or conditions that may adversely affect plant operation.
- 3.9 Checklist - A procedural attachment listing specific actions to be performed.
- 3.10 Commitment - A uniquely identified requirement that ensures future changes do not inadvertently remove the requirement. See Procedure 0.42.1 for definition of Regulatory Commitment.
- 3.11 Conditional Step - An action step based on a condition or combination of conditions to be satisfied prior to the performance of an action.
- 3.12 Consistency - Showing steady conformity to character or method allowing users to move through documents without having to waste effort interpreting the style of presentation for each section they encounter. Comprehension is improved when users can concentrate on the actual performance of the instructions.
- 3.13 Emphasis - Special formatting applied to text to convey importance or prominence.
- 3.14 Hold Point - A pre-selected step in a procedure that identifies a point beyond which work may not proceed until the required action is performed.
- 3.15 Level of Detail - The technical detail necessary within a procedure step to successfully interface the individual user's knowledge to the technology being used or task being performed.
- 3.16 NOTE - A statement placed immediately before applicable step(s) that provides explanatory information to support a procedure step or series of steps.

CNS Procedure writer's guide

Title: Startup RPS MG Set A (Alternate Path)

Cooper Nuclear Station
Job Performance Measure

NRC P1

Title: Startup RPS MG Set A (Alternate Path)

(JPM P1)

Startup RPS MG Set A (Alternate Path)

ALTERNATE PATH

Revision Statement: This JPM was modified from bank JPM SKL034-10-96. The original JPM was an alternate path that required voltage adjustment during RPS MG start up. For this JPM, the failure simulates a rectifier failure that instead requires shutting down the MG set.

Additional Program Information:

1. Appropriate Performance Locations: Plant
2. Appropriate Trainee level: RO / SRO
3. Evaluation Method: Simulate
4. Performance Time: 20 minutes
5. K/A: 212000 A1.01 (2.8/2.9), A2.01 (3.7/3.9)

General References:

1. Procedure 2.2.22 Section 5.1 and 11

General Tools and Equipment:

1. Key for access to Control Building RPS MG Set Room doors.

Special Conditions, References, Tools, Equipment:

1. Critical steps denoted in **bold**.
2. Alternate path denoted by ♦.

Task Standards:

1. On completion of this JPM, the applicant started and, then, shuts down RPS MG Set A after determining voltage cannot be maintained within the required operating band **without adjusting the potentiometer.**

↑
Licensee requests to delete this line

Title: Startup RPS MG Set A (Alternate Path)

Directions to Examiner:

Note: This JPM is an Alternate Path JPM. Voltage will swing when the RPS MG Set is started, simulating a rectifier card failure. If attempted, voltage will not adjust within the required band. This will require MG Set shutdown.

1. This JPM evaluates the trainee's ability to startup the reactor protection motor generator set.
3. Observe the trainee during performance of the JPM for proper use of self-checking methods.
4. Check off either satisfactory or unsatisfactory performance. If unsatisfactory, state why in the notes section below.
5. Brief the trainee, and tell the trainee to begin.

Notes: _____

Total Time: _____

Trainee: _____ Examiner: _____

Pass Fail Examiner Signature: _____ Date: _____

Title: Startup RPS MG Set A (Alternate Path)

Read the following to the JPM performer.

Precaution: DO NOT PHYSICALLY MANIPULATE ANY PLANT EQUIPMENT.

General Conditions:

1. The plant is operating at 99% of rated capacity.
2. RPS MG Set A was shut down for bearing replacement.
3. RPS MG Set A maintenance has been completed.
4. The VOLTAGE ADJ potentiometer setting was NOT changed while RPS MG Set A was shut down.
5. RPS Power Panel 1A, RPSPP1A, is being supplied by CDP 1B.

Initiating Cues:

You have been assigned to return RPS MG Set A to service per SOP 2.2.22. The Control Room Supervisor directs you to place RPS MG Set A in service in preparation for transferring RPSPP1A to RPS MG Set A. You are to notify the CRS when the task RPS MG Set A is ready for transfer.

Start Time: _____

Performance Checklist	Standards	Sat	Unsat
1. Obtain a copy of Procedure 2.2.22.	Obtains a copy of the current revision of Procedure 2.2.22, Section 5.		
2. (Step 5.1.1.1) Ensure AC OUTPUT GEN breaker is OFF	Ensures the AC OUTPUT GEN breaker is OFF at RPS MOT AND GEN SET #1A CONTROL CUBICLE. CUE: Breaker handle is pointed toward OFF CUE: If asked, at RPS MOT AND GEN SET #1A POWER TRANSFER CONTACTORS panel, the red LOAD CONNECTED TO EMERGENCY light is On, and the red LOAD CONNECTED TO NORMAL light is Off.		
3. (Step 5.1.1.2) Ensure AC INPUT MOT breaker is OFF	Ensures the AC INPUT MOT breaker is OFF. CUE: Breaker handle is pointed toward OFF.		
4. (Step 5.1.2) Ensure feeder breaker Closed	Closes breaker 3D on MCC-L for MG set A. CUE: (Initially) breaker handle is pointed toward OFF. CUE: (When operated) breaker handle is pointed toward ON.		
CAUTION – VOLTAGE ADJ potentiometer setting shall not be adjusted unless it is known that setting has been changed while RPS MG Set A was shut down.			
5. (Step 5.1.3.1) Check VOLTAGE ADJ position	Checks the voltage ADJ is at approximately the midpoint position. CUE: Dial is at the middle of the scale.		

Licensee states that this caution only applies to the next step (5.1.3.1) → does not apply to Step 5.1.3.5

Performance Checklist	Standards	Sat	Unsat
6. (Step 5.1.3.2) Close drive motor breaker	Closes the AC INPUT MOT breaker for MG Set A located at RPS Control Cubicle A in the Control Building reactor protection system room A. CUE: (If asked) Control Room cannot place the RPS selector switch to the MG set position. CUE: Breaker handle is pointed toward ON.		
7. (Step 5.1.3.3) Start the MG set	Depresses the MOTOR ON pushbutton at RPS Control Cubicle A for MG set A and release when A-C VOLTS are >110V. CUE: (After ~ 15 seconds) A-C VOLTS are 111V.		
<p>Note to Examiner: In the next step, the student may elect to immediately shut down the RPS MG Set due to equipment malfunction by performing JPM step 17 and/or 18 (Procedure 2.2.2 step 11.1.4.2 and/or 11.1.4.3). This is acceptable. In that case, JPM steps 9 through 16 are not applicable.</p>			
8. (Step 5.1.3.4) Check A-C Volts	Checks A-C Volts have stabilized between 114V and 126V. CUE: A-C Volts are swinging full scale 0-150 VAC approximately once per second. CUE: (IF asked) Maintenance is unavailable to attempt to adjust voltage.		
<p>Note to Examiner: If not immediately secured, <u>the student should elect to shut down the RPS MG Set per 2.2.2 section 11 at this point, since the initial conditions stated the voltage adjustment potentiometer setting had not been changed.</u> IF so, steps 9 through 11 are not applicable and are only provided as a reference for the examiner.</p>			

*

* this note is not correct per licensee.

Performance Checklist	Standards	Sat	Unsat
(Step 5.1.3.5a) 9. ♦ Loosen locking screw	Loosens the VOLTAGE ADJ potentiometer locking screw with the screwdriver. CUE: The locking screw is no longer in contact with the dial.		
(Step 5.1.3.5b) 10. ♦ Adjust VOLTAGE ADJ potentiometer	Makes small increment adjustments to the VOLTAGE ADJ potentiometer until voltage is in band. CUE: After the operator has indicated a rotation in either direction, indicate that A-C voltage is unchanged and is still swinging full scale. CUE: After the operator has made some adjustment indicate that the potentiometer has reached its stop and A-C voltage is unchanged and still swinging full scale.		
(Step 5.1.3.5c) 11. ♦ Tighten locking screw	Tightens the VOLTAGE ADJ potentiometer locking screw with the screwdriver by turning clockwise. CUE: The locking screw is tight against the dial.		
(Step 5.1.3.5d) 12. ♦ Determines RPS A MG Set shutdown is required.	If voltage cannot be adjusted within 114V to 126V, then informs Control Room Supervisor and proceeds to 2.2.22 section 11 to remove RPS MG Set A from service and informs Electricians. CUE: As the Control Room Supervisor, acknowledge the report. If asked as the CRS to inform Maintenance/Work Control, acknowledge you will do so.		

*

* With task standard as currently written, an applicant who attempted to adjust potentiometer would fail JPM. Licensee states it is acceptable for applicant to attempt to adjust potentiometer.

Performance Checklist	Standards	Sat	Unsat
(Step 11.1.1) 13. ♦ Ensures RPSPP1A is supplying RPS A	Ensures RPS A is being supplied from alternate source (initial condition) CUE: If asked, as the Control Room crew report RPS A is energized from its alternate source.		
(Step 11.1.2) 14. ♦ Ensure EPA 1A2 breaker OFF	At Electrical Protection Assembly 1A2 (RPS MG Set Room A) checks breaker in OFF CUE: Breaker handle is pointed toward OFF.		
(Step 11.1.3) 15. ♦ Ensure EPA 1A1 breaker OFF	At Electrical Protection Assembly 1A1 (RPS MG Set Room A) checks breaker in OFF CUE: Breaker handle is pointed toward OFF.		
(Step 11.1.4.1) 16. ♦ Ensure RPS MG Set A Output breaker is open.	Ensures AC OUTPUT GEN breaker for MG set A located at RPS Control Cubicle A is open. CUE: Breaker handle is pointed toward OFF.		
<p align="center">Note to Examiner: Only one of the following two steps is required to be performed to stop RPS MG Set A. Both may be performed, but only one is necessary to meet the critical step criteria.</p>			
(Step 11.1.4.2) 17. ♦ Stop RPS MG Set A	Depresses the MOTOR OFF pushbutton at RPS Control Cubicle A for MG set A and release when green Off light comes on. CUE: (After ~ 5 seconds) Green Off light is illuminated and A-C voltage is zero VAC. MG Set speed is lowering audibly.		

Performance Checklist	Standards	Sat	Unsat
18. (Step 11.1.4.3) ♦ Open drive motor breaker	Opens the AC INPUT MOT breaker for MG Set A located at RPS Control Cubicle A in the Control Building reactor protection system room A. CUE: Breaker handle is pointed toward OFF. MG Set speed is lowering audibly.		
19. Inform the Control Room Supervisor of completion.	Notifies the CRS that RPS MG set A has been shut down. CUE: Control Room Supervisor acknowledges the report.		

Stop Time: _____

(JPM P1)

ATTACHMENT 1

Precaution: DO NOT PHYSICALLY MANIPULATE ANY PLANT EQUIPMENT.

General Conditions:

1. The plant is operating at 99% of rated capacity.
2. RPS MG Set A was shut down for bearing replacement.
3. RPS MG Set A maintenance has been completed.
4. The VOLTAGE ADJ potentiometer setting was NOT changed while RPS MG Set A was shut down.
5. RPS Power Panel 1A, RPSPP1A, is being supplied by CDP 1B.

Initiating Cues:

You have been assigned to return RPS MG Set A to service per SOP 2.2.22. The Control Room Supervisor directs you to place RPS MG Set A in service in preparation for transferring RPSPP1A to RPS MG Set A. You are to notify the CRS when the task RPS MG Set A is ready for transfer.