1603 NRC **JPM C** adjustment justification.

During performance of JPM C, one applicant failed to open FCV-63-7. In the original version of the JPM the step to open both FCV-63-6 **AND** FCV-63-7, “RHR Supply to SI pump suction” was noted CRITICAL due to the belief that both valves were required to provide suction flow from the RHR pumps to the suction of the SI pumps. After a review of ES-1.3, “TRANSFER TO RHR CONTAINMENT SUMP” and drawing 47W811, "Flow Diagram Safety Injection System" sheet 1, both FCV-63-6 and FCV-63-7 are in parallel. Therefore, opening either valve provides flow from the RHR pumps to the SI pumps suction. Sequoyah requests the wording on JPM step 19 be changed to open FCV-63-6 **OR** FCV-63-7.

From ES-1.3 TRANSFER TO RHR CONTAINMENT SUMP

11.	**OPEN** CCP and SI pump suction valves from RHR: • FCV-63-7 • FCV-63-6.	**ENSURE** the following: • FCV-63-7 OPEN **OR** • FCV-63-6 OPEN.

1603 NRC **JPM F** adjustment justification.

During performance of JPM F, two applicants failed to close dampers 1-FCO-65-52, “Annulus Vacuum fan 1A Isolation Damper” and 1-FCO-65-53, “Annulus Vacuum fan 1B Isolation Damper” due, in part to the applicants using provisions contained in EPM-4, “USER’S GUIDE APPENDIX E APPROVED PRUDENT OPERATOR ACTIONS.” In the original version of the JPM, steps to close 1-FCO-65-52, “Annulus Vacuum fan 1A Isolation Damper” and 1-FCO-65-53, “Annulus Vacuum fan 1B Isolation Damper” were marked CRITICAL due to the belief that the dampers when closed allowed EGTS to perform the design function of maintaining the annulus at a slight vacuum during a LOCA and prevented the possibility of an unfiltered release from the annulus to the Auxiliary Building ventilation stack (atmosphere) under certain conditions. After reviewing drawings 47W866-1, 47W866-10 and 47W866-11, “Auxiliary Building Exhaust Vent Isolation Dampers,” FCO-30-49 and FCO-30-55, located downstream of 1-FCO-65-52 and 1-FCO-65-53 were discovered to provide the isolation function for Auxiliary Building ventilation. Additionally, “Auxiliary Building Exhaust Vent Isolation Dampers,” FCO-30-49 and FCO-30-55 will receive an automatic closure signal upon receipt of a Phase A Isolation signal, which occurred during the postulated condition of this JPM. Therefore, closure of 1-FCO-65-52, “Annulus Vacuum fan 1A Isolation Damper” and 1-FCO-65-53, “Annulus Vacuum fan 1B Isolation Damper” would not be critical since the downstream path would be isolated upon receipt of Phase A Isolation. Sequoyah requests the wording on JPM step 11 and 12 be changed to reflect this discovery.

Condition Report No. 1154410 was initiated for Sequoyah Initial License Training to evaluate training on the provisions contained in EPM-4 USER’S GUIDE APPENDIX E APPROVED PRUDENT OPERATOR ACTIONS and what the implications of utilizing prudent operator actions may result in.