

VogtlecolRAIsPEm Resource

From: Patel, Chandu
Sent: Thursday, April 21, 2016 4:14 PM
To: VogtlecolRAIsPEm Resource
Subject: RAI Letter 9
Attachments: Vogtle Walkthrough Exemption for JPMs RAI letter 09.docx

Chandu Patel, Senior Project Manager
U.S. NRC, Office of New Reactors
NRC/NRO/DNRL/LB4,
Washington, DC 20555-0001
301.415.3025
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From: Patel, Chandu

Created By: Chandu.Patel@nrc.gov

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"VogtlecolRAIsPEm Resource" <VogtlecolRAIsPEm.Resource@nrc.gov>
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April 21, 2016

Mr. B.H. Whitley, Director
Regulatory Affairs
Southern Nuclear Operating Company, Inc.
42 Inverness Center Parkway, B022
Birmingham, AL 35242

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 09 RELATED TO A WALKTHROUGH EXEMPTION FOR THE JOB-PERFORMANCE MEASURES FOR VOGTLE ELECTRIC GENERATING PLANT UNITS 3 AND 4 COMBINED LICENSES (TAC NO. RP9515)

Dear Mr. Whitley:

By letter dated April 15, 2016 (ADAMS Accession No. ML16109A013), Southern Nuclear Operating Company (SNC) requested an exemption from the plant walkthrough requirement of 10 CFR 55.46(b) and requirements in NUREG 1021, "Operator Licensing Examination Standards for Power Reactors", which is incorporated by reference in 10 CFR 55.40(a) and 10 CFR 55.40 (b), related to the development and administration of job-performance measures in the plant. An exemption from the plant walkthrough requirement of 10 CFR 55.45(b) is necessary in order for SNC to administer the plant walkthrough portion of the operating test as described in NUREG-1021.

In the course of reviewing your request the NRC staff has identified the need for additional information. The request for additional information (RAI) is enclosed. Please respond to this RAI by May 5, 2016 of receipt of this letter.

If you have any questions or comments concerning this matter, please contact me at 301-415-2809 or Paul.Kallan@nrc.gov.

Sincerely

/RA/

Paul Kallan, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 8590

Enclosure:
Request for Additional Information 09

CC: see next page

If you have any questions or comments concerning this matter, please contact me at 301-415-2809 or Paul.Kallan@nrc.gov.

Sincerely

/RA/

Paul Kallan, Senior Project Manager
Licensing Branch 4
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-025
52-026
eRAI Tracking No. 8590

Enclosure:
Request for Additional Information 09

CC: see next page

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DATE	04/21/16	04/21/16	04/21/16

*Approval captured electronically in the electronic RAI system.

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Request for Additional Information 9

Issue Date: 04/21/2016

Application Title: VEGP Units 3 and 4 - LARs

Operating Company: Southern Nuclear Operating Co.

Docket No. 52-025 and 52-026

Review Section: 13.02.01 - Reactor Operator Requalification Program; Reactor Operator Training

Application Section:

QUESTIONS

13.02.01-1

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Basis:

- 10 CFR 55.40(a) states, "The Commission shall use the criteria in NUREG-1021, 'Operator Licensing Examination Standards for Power Reactors,' in effect six months before the examination date to prepare the written examinations required by §§ 55.41 and 55.43 and the operating tests required by § 55.45. The Commission shall also use the criteria in NUREG-1021 to evaluate the written examinations and operating tests prepared by power reactor facility licensees pursuant to paragraph (b) of this section." NUREG-1021, Revision 10, Appendix A, "Overview of Generic Examination Concepts," Section C.1.b (last paragraph), describes the concept of content validity as it relates to operator licensing examinations and states in part, "The initial examination, on the other hand, covers all instruction related to safety-significant K/As that either were or should have been taught during the training program. The examination standards ensure that the K/As are sampled in a relatively uniform process that would likely include content and instruction that occurred from the beginning to the end of the program and not be focused upon any particular segment of instruction." Additionally, NUREG-1021, ES-301, "Preparing Initial Operating Tests," Sections D.4.a and D.4.b, provide direction to select systems from the nine safety function groupings in the K/A catalog (i.e., NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators, Pressurized Water Reactors, Westinghouse AP1000" for the AP1000), and for each system selected, to select a task for which a JPM exists or can be developed.
- NUREG-1021, ES-201, "Initial Operator Licensing Examination Process," Page 17/28, states, "The license applicants should not be able to predict or narrow the possible scope or content of the licensing examination based on the facility licensee's examination practices (other than those authorized by NUREG-1021, or in writing by the NRC)."
- NUREG-1021, Appendix A, "Overview of Generic Examination Concepts," Section C.1, "Content Validity," outlines the three principal facets of test validity and the techniques that are used to establish the validity of NRC examinations.

Questions:

1. Enclosure 2, Section 1.3, "Task List," of the submittal dated April 15, 2016 (ADAMS Accession No. ML16109A013), says, "Tasks with DIF [difficulty, importance, and frequency] ratings greater than 2.5 were then screened for their suitability for evaluation using the Cold Licensing alternate methods. Most of these tasks were determined to be suitable for evaluation using the Cold Licensing alternate methods. Some were not. The reason some tasks were unsuitable was because no procedure had, as yet, been developed to support performing these tasks. This is important because without a procedure, a task can neither be performed nor evaluated. SNC evaluated the set of tasks having procedures and determined that the total number was adequate to meet the validity and reliability criteria set forth in NUREG-1021, Appendix A."
 - a. Please list the safety function(s) from NUREG-2103, Section 1.9.1, "Plant System Organization by Safety Function," associated with each task in Enclosure 2, Table E-2, "In-Plant Task List." If any safety function is not represented on the list, describe any impact on content validity.
 - b. The submittal indicates that some tasks do not yet have procedures available, but it is not clear to the staff whether other tasks have been excluded for other reasons. Please provide additional information as to (1) why procedures are not available for the tasks that have been excluded, (2) why some (if any) tasks were unsuitable for reasons other than the procedure has not been developed, and (3) whether the exclusion of tasks with an importance rating >2.5 from the list in Enclosure 2, Table E-2 will have an impact on content validity (if SNC determines there is no impact, then ensure an explanation is provided to support the conclusion).
 - c. Please identify the "validity and reliability criteria" that SNC determined were satisfied, and please explain how SNC determined this.
2. Enclosure 2, Page 5/14, states, "SNC determined that the number of tasks that was left following this screening process was sufficient to preclude predictability and that no applicant would be able to predict what task would appear on an exam." Please explain the basis for the conclusion.
3. Enclosure 2, Page 8/14, states, "Utilizing cold licensing evaluation methods during the administration of in-plant walkthrough JPMs should not, and does not, alter the method in which JPMs are selected or sampled." Please describe how sampling will be performed.
4. Enclosure 2, Page 8/14, states, "Additionally, for each of the three tasks selected for the in-plant portion of the examination, the incorporation of alternate paths during development of the three corresponding JPMs (either "faulted" or not "faulted") will elevate cognitive levels." Please clarify if the intent is for all three in-plant systems JPMs to be alternate path JPMs.
5. The cover letter for the submittal, first paragraph, states that "Southern Nuclear Operating Company (SNC) requests NRC approval of an exemption from...and, to the extent the NRC deems necessary, from the requirements in NUREG-1021..." The staff notes that NUREG-1021, ES-301, Section D.4.b states, "In addition, at least one of the tasks conducted in the plant...shall require the applicant to enter the RCA." If the plant has not yet been constructed, then the RCA has also not been constructed, and therefore the applicants cannot enter the RCA. Please identify the requirements in NUREG-1021 that are affected by this exemption request in the submittal.