

SummerRAIsPEm Resource

From: Gleaves, Bill
Sent: Wednesday, July 27, 2016 9:23 AM
To: SummerRAIsPEm Resource
Cc: Kallan, Paul
Subject: FW: Draft RAI for In-Plant JPM
Attachments: Draft RAI_VCSNS Unit 2 JPM Exemption .docx

From: Kallan, Paul
Sent: Wednesday, July 27, 2016 9:22 AM
To: Gleaves, Bill
Subject: Draft RAI for In-Plant JPM

Hi Billy,

Here are the RAIs. Please kindly send me a pdf.

Thank you,

Paul Kallan

Office of New Reactors
Division of New Reactor Licensing
Licensing Branch 4
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Paul.Kallan@nrc.gov

Hearing Identifier: Summer_COL_eRAIs
Email Number: 168

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Subject: FW: Draft RAI for In-Plant JPM
Sent Date: 7/27/2016 9:23:18 AM
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From: Gleaves, Bill

Created By: Bill.Gleaves@nrc.gov

Recipients:

"Kallan, Paul" <Paul.Kallan@nrc.gov>
Tracking Status: None
"SummerRAIsPEm Resource" <SummerRAIsPEm.Resource@nrc.gov>
Tracking Status: None

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Options

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RAI – VCS In-plant Job Performance Measures (JPM) Exemption and Proposed Alternative

Regulatory Basis:

NUREG 1021, ES-201, “Initial Operator Licensing Examination Process,” Section B, “Background,” states,

Facility licensees may propose alternatives to the examination criteria contained here and evaluate how the proposed alternatives provide an acceptable method of complying with the Commission’s regulations. The NRC staff will review any proposed alternatives and make a decision regarding their acceptability. The NRC will not approve any alternative that would compromise the agency’s statutory responsibility to prescribe uniform conditions for the operator licensing examinations.

By Letter NND-16-0266 from Mr. Ronald A. Jones, Vice President, South Carolina Electric & Gas Company (SCE&G), New Nuclear Operations, to the NRC received July 12, 2016, “Request for an Exemption: Operator Licensing,” (ADAMS Accession No. ML16207A386), SCE&G proposed an alternative to the examination criteria contained in NUREG-1021, ES-301, Section D.4.a (evaluate three in-plant JPMs) and Section D.4.b. (require the applicant to enter the radiation control area).

The staff reviewed the proposed alternative described in Letter NND-16-0266 and requests additional information to make a decision regarding its acceptability.

Questions:

1. Section 3.1, “Administration of In-Plant JPMs using Cold License Training Plan Methods,” of Enclosure 1, “Plant Walkthrough Exemptions,” of letter NND-16-0266 states, “VCS is in the process of procuring equipment for a breaker lab that contains 6.9kV and 480V breakers that can be locally operated and racked in and out.”

The letter does not say when VCS will have this equipment available for training and administering operating tests. Additionally, Table E-2, “In-Plant Task List,” contains two tasks associated with racking 480V breakers: Task ID AP-NL-ADM.018.3, “Rack In a 480v Load Center Breaker” and Task ID AP-NL-ADM.018.4, “Rack Out a 480v Load Center Breaker.”

- a. Please state in the request when the breaker lab will be available for use in operator training and licensing examinations.
 - b. Please state whether the breaker lab is necessary in order to develop JPMs for these two tasks.
2. Table E-2, “In-Plant Task List,” in Enclosure 2, “Information Related to the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 NRC Requests for Additional Information (RAIs) on VEGP Plant Walkthrough Exemptions” lists 91 tasks screened from the site-specific task list that can be used to develop an in-plant JPM at this time. Some tasks are listed as

being associated with more than one plant system and therefore more than one safety function. For tasks associated with the reactor coolant system (RCS), the passive core cooling system (PCS), and the chemical and volume control system (CVS), the staff understands that two safety functions are listed because NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators: Westinghouse AP1000 Pressurized-Water Reactors," states that these three systems contribute to more than one safety function. However, for other tasks in Table E-2 not related to the RCS, CVS or PCS plant systems, (e.g., Task ID AP-NL-SWS.012.2, "Respond to Service Water System (SWS) B/D Hi Radiation"), more than one system and more than one safety function are listed. On Page 3/14 of Enclosure 2, the request states that "multiple new or modified JPMs can be developed from the tasks on Table E-2."

The staff requests that SCE&G confirm that for each task listed in Table E-2 with more than one system of safety function listed, SCE&G staff verified that a JPM could be developed that directly relates to the operation of each system listed for each task that has more than one system in the system column. For example, for Task ID AP-NL-SWS.012.2, "Respond to Service Water System (SWS) B/D Hi Radiation," a JPM can be developed that is directly related to the applicant's ability to operate the service water system, and another JPM can be developed that is directly related to the applicant's ability to operate the radiation monitoring system.

3. Enclosure 1, "Plant Walkthrough Exemptions," Section 6.3, "Otherwise in the Public Interest," of Letter NND-16-0266, states, "Students enrolled in an ILO [initial license operator training] program are training as a full time job and would not normally participate in completing the required 6 months of meaningful work experience."

Participation in at least 6 months of practical work experience is an experience requirement that must be satisfied by an applicant to earn the operator license as stated in Section 13.2A.1 of the VCS Units 2&3 Updated Final Safety Analysis Report. Please clarify in the submittal that SCE&G expects the applicants will complete the six months of practical work experience required for the license, and that SCE&G is not proposing an alternative that would eliminate this experience requirement.