

NRC ILE Outline and Operating Test Submittal Comments

2016 Davis-Besse Nuclear Power Station

	Outline Submittal Comments	
	Chief Examiner Comment	Facility Action/Response
Admin JPMs Outline	No Comments	Lic: NRC:
Sim/Inplant JPMs Outline	No Comments	Lic: NRC:
JPMs-Admin	No Comments	Lic: NRC:
JPMs-System	No Comments	Lic: NRC:
JPMs-In-Plant	No Comments	Lic: NRC:
Scenario ES-D-1s	No Comments	Lic: NRC:

	Operating Test Submittal Comments	
	RO/SRO Admin JPMs Comments	
	Chief Examiner Comment	Facility Action/Response
RO Admin A1.1	Applicant must earn the DB-PF-06703 procedure, then evaluator may provide a copy to the applicant. Reword the initiation cue to state "Shift Manager directs you to calculate..."	Lic: This JPM administered in classroom setting with the curve book.
RO Admin A1.2	What determines the "acceptable limits" placed on the Steps 3, 8, 9, 13, & 14 answers? (i.e. Step 14 should be 860-880 MWe min and 920-940 MWe max.)	Lic: Steps 3, 9 and 13 are based on +/- half increment of graph grid reading. Step 8 calculation based on max/min readings. Revised Step 14 to say "Acceptable is calculation of ± 30 applied to value determined in previous performance step."
RO Admin A2	What determines the "acceptable limits" placed on portions of the Step 2 pressure readings? (Isn't that why the allowable tolerance is 100 psi?) Why doesn't the cover sheet need to be signed- wouldn't that be expected for this activity?	Lic: Tightened Step 2 limits to half of increment that can be read. Values are not exact, will have to revise based on where simulator is frozen for the JPM. Cover sheet is signed.
RO Admin A3	If the applicant is expected to initial off Step 4.2.13 (per initiating cue), then the evaluator needs to sign as the IV once the applicant states that an IV is required to complete the step.	Lic: Correct. NRC: The evaluator will sign as the IV on the Attachment 24 referenced by Step 4.2.13.
SRO Admin A1.1	Does determining correct notification requirements normally include specifying the required notification time limit? Consider including.	Lic: No time limit required.
SRO Admin A1.2	Add cue for evaluators to have applicant continue with review if TS entry identified and reported during review process. (Do the applicants need to correct the identified errors?)	Lic: Discussed with examiners, practice is to cue applicants to continue with review to identify all errors. Applicants are only expected to identify the errors and return to responsible party to correct them.
SRO Admin A2	No Comments	Lic:

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SRO Admin A3	No Comments	Lic:
SRO Admin A4	<p>The JPM Task begins 5 minutes after the EAL threshold has been met. This is unrealistic since the initial conditions state that the applicant is the ED. The 10 minute Time Critical Task is not justified based upon ICs.</p> <p>The wallboard charts should be staged and marked up for the initial SU1 declaration, again because the initial conditions state that the applicant is the ED.</p> <p>The 2nd Time Critical Task is 15 minutes after declaration of the new emergency classification, but the clock should be stopped when a party answers the 4-way ring-down phone, not when the applicant picks it up.</p> <p>Is this considered alternate path since Lucas County isn't initially on the 4-way ring-down line?</p>	Lic: Revised JPM. Task will begin at t=0, no 5 minute credit. Wallboard will be staged and marked. TC for the phone call ends when the applicant makes the call, not when someone answers. It should be alternate path.

	RO/SRO CR/IP System JPMs Comments	
	Chief Examiner Comment	Facility Action/Response
SIM JPM S1	<p>What indications are available for CC 1328 failing closed?</p> <p>Need to check copy of DB-OP-02523 for actions on CCW System Malfunctions – what allows the attempt to start CRD Booster pump 1 under these plant conditions? Check Alarm Response Procedure. (Is BE2206 open? Is this a centrifugal pump?)</p> <p>Who actually opens CC 1328? (If valve is opened by an EO, then Performance Step 13 may not be a critical step.)</p> <p>Must CRD Booster pump be running to successfully complete the JPM?</p>	<p>Lic: There are panel indications for CC 1328.</p> <p>The applicant will pull copy of the ARP which allows starting the pump under the stated conditions.</p> <p>MCR operator opens CC 1328.</p> <p>The CRD Booster Pump 1 must be running to complete the JPM.</p>
SIM JPM S2	<p>Would the Command SRO normally direct the step-by-step performance of Attachment 7?</p> <p>Limit time to review to simulate actual plant conditions response. (Don't impose artificialities on the applicants.)</p>	<p>Lic: The Command SRO would normally direct the step-by-step performance of Att 7. However, the ROs are required to know how to perform the LPI suction transfer to the Emergency Sump task. For the purpose of JPM evaluation of the task the ROs are evaluated based on their actions to perform the task without the SRO Command function. Will also do the Initial Conditions/Initiating Cue before stepping into simulator.</p>
SIM JPM S3	<p>Same comment on step-by-step performance as noted in previous JPM.</p> <p>If MU 3971 is not critical because MU2 pump is not running, then why is in this section (Only MU1 pump running-Step 4) of the procedure?</p> <p>Performance Step 16 STANDARD should state, "... and verify RC 11 closes."</p>	<p>Lic: The Command SRO would normally direct the step-by-step performance. However, the ROs are required to know how to perform actions for recovery from MU/HPI/PORV Cooling task. For the purpose of JPM RO evaluation, they are expected to perform the task without the SRO Command function.</p> <p>Part of the procedural transition to the remaining steps and the alternate path.</p>

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SIM JPM S3 (continued)		Insert comment.
SIM JPM S4	Need to review marked-up copy of DB-OP-06224, thru step 3.16.43 to validate JPM.	Lic: Incorporated. Step 14 not critical (pump starts then trips). Initiating Cue: add "...local operator in field for local transfer." (Step 11)
SIM JPM S5	What determines which containment isolations are required? Which ones are they?	Lic: Procedure guides provided by the SM. JPM Step 4-bases-Level 1 and 2. Lists valves that can be closed from the MCR.
SIM JPM S6	Since the JPM actions must be started no longer than 15 minutes from the initiation of the event, recommend changing the initial conditions to state that something less than 15 minutes have elapsed and adjust the time critical task accordingly. (Validation time is actually 8 minutes; is this really time critical?) Also recommend not informing the applicant that another operator has been dispatched to perform Attachment 14 until they either ask or get to Step 2 of Attachment 5.	Lic: The licensee JPM time critical task is for 15 minutes, therefore, we wouldn't normally do anything less even though the validation time is 8 minutes. Can adjust Initiating Cue accordingly to wait for applicant to ask if operator dispatched to perform Att 14, or get to JPM Step 2 of Attachment 5. Add cue to only do 1 AFP.
SIM JPM S7	Where does the applicant obtain keys for opening the cabinet doors? Recommend adding an evaluator cue that states that enough time has elapsed to repair and test the failed NI channel, and now the Unit Supervisor directs the applicant to complete subsection 4.4 of DB-OP-06403.	Lic: Keys are located in MCR cabinet. Examiners will use time compression to cue the applicant that the NI has been repaired and tested, and is ready to be re-energized per Section 4.4 of DB-OP-06403.
SIM JPM S8	Do 'expected alarms' need to be addressed as part of a pre-evolution brief item to be announced as 'expected'?	Lic: Expect applicants to reference ARP, mark it and identify "expected alarms."

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IP JPM P1	<p>Is there more than one Low Voltage Switchgear Room? The JPM title and the initiating cue should match.</p> <p>If this procedure step is an “Immediate Action,” why is the applicant initially handed a copy of the procedure?</p> <p>What is the purpose of Performance Step 1?</p> <p>How does the applicant ‘earn’ the information that the reactor has (or has not) tripped? Is a cue required to be provided by the evaluator?</p> <p>How are E2 & F2 normally deenergized? Is this Alt Path?</p>	<p>Lic: There are two low voltage switchgear rooms and the applicant will access both.</p> <p>The cue to hand copy to applicant will be deleted.</p> <p>Step 1 is N/A if applicant not handed a copy of procedure.</p> <p>Applicant must earn information based on the trip flag color. Add cue for examiner.</p> <p>Not alternate path because JPM started in the RNO step.</p>
IP JPM P2	Once Instrument Air has been restored, and the applicant is directed to restore IA to ICS11A, either have the applicant verify steps C 5.c & d, or add an evaluator cue to state that the actions will be completed by another operator, and then the JPM is complete.	Lic: Operator will verify Steps C 5 c. and d.
IP JPM P3	No Comments	Lic:

	Scenario D-1 Comments	
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Scenario 1 (DB NRC 2016)	<p>No comments on scenario events.</p> <p>This scenario has the same Critical Task (CT-1) as Scenario 3. Since Crew A will see both scenarios, recommend changing the Spare to Scenario 3 and use Scenario 4 in place of Scenario 3.</p> <p>NOTE: This is the only low power scenario submitted.</p>	Lic: Will make this the spare scenario and eliminate the CT conflict with Scenario 3.
Scenario 2 (DB NRC 2016)	<p>No comments on scenario events.</p> <p>Why is Event 2 Description Bolded?</p>	Lic: Remove “bold”. Was errata.
Scenario 3 (DB NRC 2016)	<p>See comment for Scenario 1 above.</p> <p>Make this one the Spare.</p>	Lic: Will use this scenario, make Scenario 1 the spare.
Scenario 4 (DB NRC 2016)	<p>No comments on scenario events.</p> <p>Use in place of either Scenario 1 (or 3).</p> <p>Why is Event 6 Description Bolded?</p>	<p>Lic: Will use Scenario 4 in place of Scenario 1.</p> <p>Remove “bold”. Was errata.</p>