

Attachment 1

Post Exam Comments

1. JPM 290-R-4B SP 2602B Transient Temperature, Pressure Verification

Licensee comment: Due to the excessive complexity of the data provided to the candidates, combined with the initiating cue not specifying which report was required for credit, there is potential for a candidate with acceptable knowledge to provide a report different from the answer key. Based on these issues we request that any of the cooldown violations reported by a candidate be accepted as meeting the critical task.

Resolution: While the data set was complex and the initiating cue did not specify whether an administrative or Technical Specification violation was suspected and being reviewed, the JPM was an adequate test instrument and reflected actual plant practice. No change to the answer key is made.

2. JPM-293-R-RO, Review of RWP and Survey Map

Licensee comment: Eliminate selection of the RWP Task as a critical step of the JPM due to rad levels in the proposed work area being less than those requiring a High Radiation Area RWP and the existence of a undefined row of X's on the survey map which normally designate a High Radiation area boundary, which was an unintended inconsistency in the JPM.

Resolution: Licensee comment accepted. Selection of RWP Task is not critical. JPM is graded based on using either Task #1 or Task #2 and the applicable data collected and recorded from the RWP for the task selected.

Millstone Unit Two 2016 NRC Initial License Exam Post Exam Report

To: Brian Fuller, Lead Examiner, US NRC, Region 1
From: Bob Cimmino, NRC Initial License Exam Author, Millstone Unit 2
Subject: Proposed changes to the grading of RO Administrative JPM-290-R-4B, SP 2602B Transient Temperature, Pressure Verification

The original "Initiating Cue" instructed the candidate to check for Tech. Spec. Cooldown Rate violations in the data given. However, the words clarifying the specific report required for credit were removed from the cue based on feedback from the NRC. The data provided actually violated the *administrative* cooldown rate limit on at least three occasions, from 0100 to 0200 ($> 50^{\circ}\text{F}/\text{Hr.}$), from 0130 to 0230 ($> 40^{\circ}\text{F}/\text{Hr.}$) and from 0230 to 0330 ($> 50^{\circ}\text{F}/\text{Hr.}$). The original Critical Task only required the candidates recognize the violation from 0230 to 0330 ($51^{\circ}\text{F}/\text{Hr}$ cooldown indicated), due to the complexity of the required change in temperature monitoring when RCPs were secured at 0300 and the Shut Down Cooling (RHR) return to RCS (T351Y) became the temperature of record.

Due to the excessive complexity of the data provided to the candidates, combined with the change made to the Initiating Cue, there is a potential for a candidate with acceptable knowledge to provide a report different from that originally proposed as a satisfactory answer (violation at 0230-0330). In addition, it is possible for a candidate to stop after finding only one or two violations, believing they have found the problem being sought, or to only report the final violation (original answer) as that is the true Tech. Spec violation. Based on these issues, we request that **any of the above mentioned cooldown violations reported by a candidate be accepted as meeting the Critical Task for this JPM**, as it would demonstrate the knowledge being evaluated by the applicable Task and K/A.

Submitted: Robert L. Cimmino, Jr. / Robert Cimmino
Exam Author (Print/Sign)

09/21/2016
Date

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Millstone Unit Two 2016 NRC Initial License Exam Post Exam Report

To: Brian Fuller, Lead Examiner, US NRC, Region 1
From: Bob Cimmino, NRC Initial License Exam Author, Millstone Unit 2
Subject: Proposed changes to the grading of RO Administrative JPM-293-R-RO, Review of RWP and Survey Map

The original requirement of this JPM was based on the assumption that the area described in the Initiating Cue was posted as a High Radiation Area due to existing radiation levels and procedural requirements. However, the survey map provided to the candidates with the Initiating Cue showed radiation levels that were clearly below those requiring the area be posted as a High Radiation Area. In addition, the survey map was truncated from the official HP Survey Map to focus on the area pertaining to the JPM. When this was done, a key note was omitted that identified the line of "Xs" on the survey map as a High Radiation Area barrier, through which the candidates would have to pass to complete the specified task.

This left the candidates with two possible trains of thought when analyzing the survey map given with the JPM.

1. If a candidate analyzing the map noted that the barrier designated by the "Xs" is not labeled as a "High Radiation Area" boundary (no "H.R.A." next to line of "Xs") and the task to be performed does not require loitering near, or traveling close enough to, any radiation source that would qualify as a High Radiation Area, Task 1 would apply.
2. If, however, the candidate notes the job requires entry into an area of the plant that they remember is *normally* designated by Health Physics as a "High Radiation Area" due to the potential for changing radiation levels, Task 2 would be used to perform the valve alignment.

It should be noted that the task chosen is not really up to the "operator" performing the job, but actually designated by the HP Technician at the control point, who would be cognizant of present or potential changes to the applicable radiation levels. Once the appropriate Task is designated by HP, it is up to the worker to determine the remaining information pertaining to the job, such as radiation and contamination levels that will be encountered, required PCs, expected dose for the job, verification of dosimetry settings and stay time calculations.

Effectively, because of the information provided to the candidate, we request the JPM be graded **based on using either Task #1 or Task #2 and the applicable data collected and recorded from the RWP for the task selected.**

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09/21/2016
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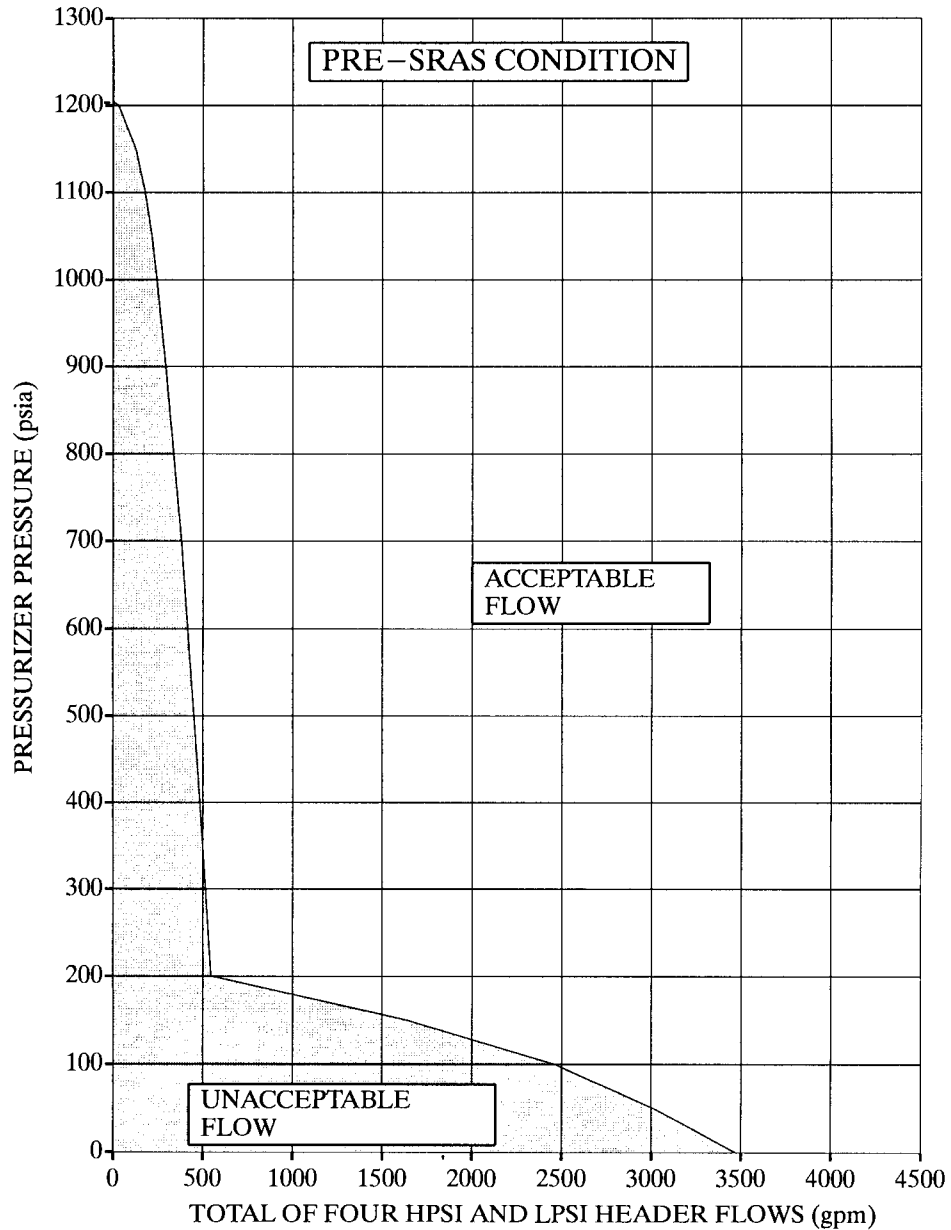
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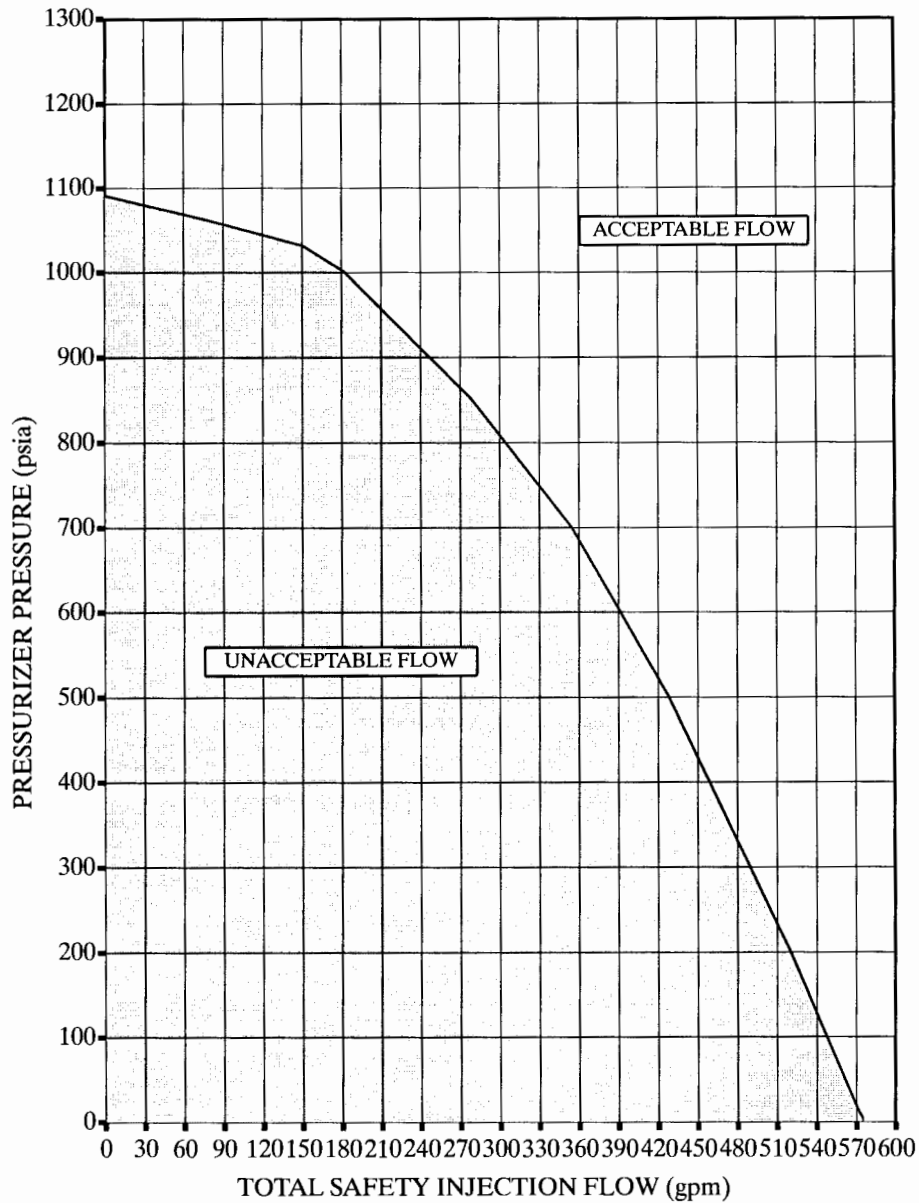
Figure 3 – Pre-SRAS Minimum Required SI Flow



- (1) This curve is based on 1 facility operating.
- (2) If harsh containment exists at any time during an event, the pressurizer pressure inaccuracy can be large, and unacceptable flow may be indicated when the actual delivered flow is acceptable. Therefore, if harsh containment exists and all other safety function parameters meet the criteria, then consider the Safety Function Satisfied.
- (3) Indicated flow should be doubled on loss of VR-11 or VR-21, if associated SI Train is operating.

Level of Use
Continuous

Figure 4 – Post-SRAS Minimum Required SI Flow



- (1) This curve is based on only one HPSI facility operating.
- (2) If harsh containment exists at any time during an event, the pressurizer pressure inaccuracy can be large, and unacceptable flow may be indicated when the actual delivered flow is acceptable. Therefore, if harsh containment exists and all other safety function parameters meet the criteria, then consider the Safety Function Satisfied.
- (3) Indicated flow should be doubled on loss of VR-11 or VR-21, if associated SI Train is operating.

**Level of Use
Continuous**

Figure 5 – Minimum ECCS Flow Requirements for Decay Heat Removal

