Dresden Reexam Outline Review Comments

- NRC: Quality checklist 201-2 is unlabeled with facility and date of examination. Correct by chief examiner.
    - Facility: comment acknowledged.
- NRC: Admin JPM of Conduct of Operations #1 is a reportability determination (TS required shutdown); the original NRC exam and audit exam for these applicants also contained reportability determinations for an Admin JPM. While not a direct duplicate, both JPMs have the same K/A's and test the same skill (screening events using reportability manual). This appears to be an inappropriate degree of overlap for a reexamination. Reportability determination was also an Admin JPM on the 2013 and 2015 exams (different K/A). With four instances of previously testing reportability determinations, there is a concern that exam content becomes predictable and the exam stops being discriminating.
    - Facility: will change JPM on outline to something different and resubmit updated outline. Requested Region to provide more concrete guidance on 'predictability' for future exams and recommended submittal of ROI for clarification on predictability.
        - NRC: Facility submitted a revised 301-1 that replaced Admin JPM Conduct of Operations #1 with a new JPM.
- NRC: Systems JPM 'e' on the original and retake exams are both containment venting tasks (the JPMs have different K/As however). The task appears to be a "Previous" JPM derived from the 2015 exam. While reuse is not an issue, overlap with the original examination could be.
    - Facility: comment acknowledged.
- NRC: Admin JPM Conduct of Operations #2 is a work hour limit waiver. This was an admin JPM on the 2013 exam (same K/A).
    - Facility: assumed that 'previous two' exams meant 2015 and 2016. Intended to reuse a JPM from the 2013 exam.
        - NRC: contacted IOLB to resolve difference in interpretations concerning which exams to count as 'previous two' exams. Resolution is that 2013 doesn't count as one. Facility informed.
- NRC: Systems JPM 'D' (startup isolation condenser with a fault) appears to be similar to a JPM on the 2013 exam.
    - Facility: Facility Response: assumed that 'previous two' exams meant 2015 and 2016. Not intending to reuse an unmodified JPM from the 2013 exam.
        - NRC: will contact IOLB to resolve difference in interpretations concerning which exams to count as 'previous two' exams.
            - NRC: Resolution is that 2013 doesn't count as one. Facility informed.
- NRC: JPMs 'b' and 'j' both deal with HPCI and group 4 isolations; it will need to be verified that excessive overlap does not exist between the two. (Appears to be a lot of the same knowledge between the two; what is different between these JPMs?)
    - Facility: comment acknowledged.