UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD
ARLINGTON, TX 76011-4511

July 11, 2017

Mr. Ken J. Peters, Senior Vice President
and Chief Nuclear Officer
Attention: Regulatory Affairs
Vistra Operations Company LLC
P.O. Box 1002
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - NRC EXAMINATION REPORT 05000445/2017301; 05000446/2017301

Dear Mr. Peters:

On June 29, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed an initial operator license examination at Comanche Peak Nuclear Power Plant, Units 1 and 2. The enclosed report documents the examination results and licensing decisions. The preliminary examination results were discussed on June 15, 2017, with Mr. T. McCool, Site Vice President, and other members of your staff. A telephonic exit meeting was conducted on June 29, 2017, with Ms. D. Christiansen, Training Director, who was provided the NRC licensing decisions.

The examination included the evaluation of three applicants for reactor operator licenses, two applicants for instant senior reactor operator licenses and one applicant for an upgrade senior reactor operator license. The license examiners determined that five of the six applicants satisfied the requirements of 10 CFR Part 55 and the appropriate licenses have been issued. There were three post examination comments submitted by your staff. Enclosure 1 contains details of this report and Enclosure 2 summarizes post examination comment resolution.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's

Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Vincent G. Gaddy, Chief
Operations Branch
Division of Reactor Safety

Docket Nos. 50-445 and 50-446
License Nos. NPF-87 and NPF-89

Enclosures:
1. Examination Report 05000445/2017301; 05000446/2017301 w/Attachment: Supplemental Information
2. NRC Post Examination Comment Resolution

cc w/enclosure:
Electronic Distribution

COMANCHE PEAK NUCLEAR POWER PLANT, UNITS 1 AND 2 - NRC EXAMINATION REPORT 05000445/2017301; 05000446/2017301 – July 11, 2017

DISTRIBUTION:
KKennedy, RA
SMorris, DRA
TPruett, DRP
AVegel, DRS
JClark, DRS
RLantz, DRP
JBowen, RIV/OEDO
KFuller, RC
VDricks, ORA
JWeil, OCA
MWatford, NRR
AMoreno, RIV/CAO
BMaier, RSLO
THipschman, IPAT
EUribe, IPAT
MHerrera, DRMA
R4Enforcement
MHaire, DRP
RAlexander, DRP
MKirk, DRP
TSullivan, DRP
JJosey, DRP
RKumana, DRP
SJanicki, DRP
DLackey, DRP

ADAMS ACCESSION NUMBER: ML17192A143

☒ SUNSI Review: By: J. Kirkland | ADAMS: ☒ Yes ☐ No | ☐ Non-Publicly Available ☒ Publicly Available | ☒ Non-Sensitive ☐ Sensitive | Keyword: NRC-002

OFFICE	SOE:OB	SOE:OB	SRI:EB2	C:OB	C:PBA	C:OB
NAME	JKirkland	COsterholtz	JDrake	VGaddy	MHaire	VGaddy
SIGNATURE	*/RA/*	*/RA/*	*/RA/ JCK for*	*/RA/*	*/RA/*	*/RA/*
DATE	7/3/17	7/3/17	7/3/17	7/11/17	7/9/17	7/11/17

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket:	05000445, 05000446
License:	NPF-87, NPF-89
Report:	05000445/2017301; 05000446/2017301
Licensee:	Vistra Energy
Facility:	Comanche Peak Nuclear Power Plant, Units 1 and 2
Location:	6322 N. FM-56, Glen Rose, Texas
Dates:	June 12 through June 29, 2017
Inspectors:	J. Kirkland, Chief Examiner, Senior Operations Engineer C. Osterholtz, Senior Operations Engineer J. Drake, Senior Reactor Inspector
Approved By:	Vincent G. Gaddy, Chief Operations Branch Division of Reactor Safety

Enclosure

SUMMARY

ER 05000445/2017301; 05000446/2017301; 06/12/2017–06/29/2017; Comanche Peak Nuclear Power Plant, Units 1 and 2; Initial Operator Licensing Examination Report.

NRC examiners evaluated the competency of three applicants for reactor operator licenses, two applicants for instant senior reactor operator licenses and one applicant for an upgrade senior reactor operator license at Comanche Peak Nuclear Power Plant, Units 1 and 2.

The licensee developed the examinations using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 10, Supplement 1. The written examination was administered by the licensee on June 19, 2017. NRC examiners administered the operating tests on June 12–15, 2017.

The examiners determined that five of the six applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

A. NRC-Identified and Self-Revealing Findings

None.

B. Licensee-Identified Violations

None.

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities (Initial Operator License Examination)

.1 License Applications

a. Scope

NRC examiners reviewed all license applications submitted to ensure each applicant satisfied relevant license eligibility requirements. Examiners also audited three of the license applications in detail to confirm that they accurately reflected the subject applicant's qualifications. This audit focused on the applicant's experience and on-the-job training, including control manipulations that provided significant reactivity changes.

b. Findings

No findings were identified.

.2 Examination Development

a. Scope

NRC examiners reviewed integrated examination outlines and draft examinations submitted by the licensee against the requirements of NUREG-1021. The NRC examination team conducted an on-site validation of the operating tests.

b. Findings

NRC examiners provided outline, draft examination and post-validation comments to the licensee. The licensee satisfactorily completed comment resolution prior to examination administration.

NRC examiners determined the written examinations and operating tests initially submitted by the licensee were within the range of acceptability expected for a proposed examination.

.3 Operator Knowledge and Performance

a. Scope

On June 19, 2017, the licensee proctored the administration of the written examinations to all applicants. The licensee staff graded the written examinations, analyzed the results, and presented their analysis and post examination comments to the NRC on June 26, 2017.

The NRC examination team administered the various portions of the operating tests to all applicants on June 12–15, 2017.

b. Findings

No findings were identified.

Five applicants passed the written examination and all applicants passed all parts of the operating test. The final written examinations and post examination analysis and comments may be accessed in the ADAMS system under the accession numbers noted in the attachment.

The examination team noted two generic weaknesses associated with applicant performance on the administrative job performance measure (JPM) section of the operating tests. The applicants displayed a weakness in calculating reactor coolant system cooldown rates, and in determining whether an operating license was active.

The licensee identified 10 generic weaknesses associated with applicant performance on the written examinations. All of the weaknesses were attributed to knowledge weaknesses on the topic.

1. Applicants unfamiliar with remote shutdown panel and train A components (Appendix R)

2. Applicants unfamiliar with steam supply to main feed pump turbine at various power levels

3. Applicants had difficulty recalling inverter internal circuitry

4. Applicants did not understand main steamline low pressure isolation logic and associated interlocks

5. Applicants unable to recall specific axis of TDM-401, “Reactive Capability Curve for Leading/Lagging Power Factor”

6. Applicants unaware of reason for sampling containment sump water following a large-break loss-of-coolant accident with flooding from additional sources

7. Applicants unable to recall technical specification applicability given specific permissive interlocks for pressurizer water level - high, Technical Specification 3.3.3, (Function 9 at power below P-7)

8. Applicants failed to correctly apply the Action Statement of Technical Specification 3.2.4, “Quadrant Power Tilt Ratio”

9. Applicants displayed general weakness in the application of ABN-909, “SFP Refueling Cavity Malfunction”

10. Applicants unfamiliar with surveillance requirements and technical specification applicability for exceeding Alert Limits during a surveillance

Copies of all individual examination reports were sent to the facility Training Manager for evaluation and determination of appropriate remedial training.

The licensee generated Issue Report IR-2017-007646 for resolution of all operating test and written examination generic weaknesses.

.4 Simulation Facility Performance

a. Scope

The NRC examiners observed simulator performance with regard to plant fidelity during examination validation and administration.

b. Findings

During administration of the operating tests, two simulator deficiencies were identified.

The first issue occurred when the simulator locked up during a scenario when the emulation for the Siemens turbine control system failed. The licensee generated Tracking Report TR-2017-007392 to capture this issue.

The second occurred when there was a momentary fault of the simulator server resulting in an unexpected reactor trip during a JPM involving a dropped rod. The licensee generated issue report IR-2017-007645 to determine the cause of the fault.

.5 Examination Security

a. Scope

The NRC examiners reviewed examination security for examination development during both the on-site preparation week and examination administration week for compliance with 10 CFR 55.49 and NUREG-1021. Plans for simulator security and applicant control were reviewed and discussed with licensee personnel.

b. Findings

No findings were identified.

4OA6 Meetings, Including Exit

Exit Meeting Summary

The chief examiner presented the preliminary examination results to Mr. T. McCool, Site Vice President, and other members of the staff on June 15, 2017. A telephonic exit was conducted on June 29, 2017, between Mr. J. Kirkland, Chief Examiner, and Ms. D. Christiansen, Training Director.

The licensee did not identify any information or materials used during the examination as proprietary.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

D. Christiansen, Training Director
J. Lloyd, Operations Support Manager
J. Ruby, Exam Developer

NRC Personnel

J. Josey, Senior Resident Inspector

ADAMS DOCUMENTS REFERENCED

Accession No. ML17179A011 - FINAL WRITTEN EXAMS
Accession No. ML17179A009 - FINAL OPERATING TEST
Accession No. ML17179A346 - POST EXAM ANALYSIS-COMMENTS

NRC Resolution to the Comanche Peak Post Examination Comments

A complete text of the licensee's post examination analysis and comments can be found in ADAMS under Accession Number ML17179A346.

A panel of two Region IV examiners was convened on June 26, 2017, to resolve three post-examination comments submitted by Comanche Peak. Both examiners were independent of the examination team. The following recommendations were submitted for branch chief review, and accepted by the branch chief on June 27, 2017:

Question 82

Unit 1 plant conditions:

- Reactor power = 90%
- 1-ALB-06D, Window 3.5, DRPI ROD DEV is lit
- 1-ALB-06D, Window 3.7, ANY ROD AT BOT is dark
- Control Rod D4 and H8 (both in Control Bank D) will not respond to demand signals from the Control Room
- Troubleshooting has determined the Rods are mechanically bound
- ABN-712, Rod Control System Malfunction has been entered
- SDM has been verified

Based on the above plant conditions, complete the following statements.

1. Control Rods D4 and H8 _(1)_ considered OPERABLE per Technical Specification 3.1.4, Rod Group Alignment Limits.

2. In accordance with ABN-712, Section 3, Dropped or Misaligned Rod in Mode 1 or 2, the crew is required to _(2)_.

   A. (1) are
      (2) trip the reactor immediately and GO TO EOP-0.0A, Reactor Trip or Safety Injection
   B. (1) are
      (2) shut down to Mode 3 within 6 hours using IPO-003A, Power Operations
   C. (1) are NOT
      (2) trip the reactor immediately and GO TO EOP-0.0A, Reactor Trip or Safety Injection
   D. (1) are NOT
      (2) shut down to Mode 3 within 6 hours using IPO-003A, Power Operations

Answer: D

Explanation:

A. Incorrect. 1st part is incorrect because IAW T.S. 3.1.4, to be operable, the affected rods must be trippable and with the rod mechanically bound, it is not trippable. It is plausible because one must know that the operability of the rod is specifically tied to trippability, it is a common misconception that rods may still be operable even though they cannot be tripped as the SDM of the core has remained unchanged as long as power and boron concentration has not changed. 2nd part is incorrect because you are not required to trip the reactor. It is plausible because if the two rods had dropped, it would be correct.

B. Incorrect. 1st part is incorrect, but plausible (see A). 2nd part is correct. With 2 rods misaligned from the step counter by > 12 steps (as verified by the alarm), the plant is required to be in Mode 3 in 6 hours using IPO-003A.

C. Incorrect. 1st part is correct. IAW ABN-712, if the control rods are not capable of motion (i.e., mechanically bound), they are not considered trippable; if they are not trippable, they are not operable per Technical Specification 3.1.4. 2nd part is incorrect, but plausible (see A).

D. Correct. 1st part is correct (see C). 2nd part is correct (see B).

Licensee Comments for Question 82

During written examination review of the CPNPP [Comanche Peak Nuclear Power Plant] 2017 NRC examination it was identified that Question 82 was incorrectly keyed. In particular:

Reason 1:

- Part 2 of the question states: "In accordance with ABN-712, Section 3, Dropped or Misaligned Rod in Mode 1 or 2"

- The question construction required the applicants to determine the sequence of events as listed in the bullets from top to bottom. The plant is at 90% power (first bullet) and with no other action the DRPI ROD DEV alarm is lit (second bullet). The DRPI ROD DEV alarm comes in when a rod is ≥ 12 steps from the remaining rods which means the rods had to drop into the core

- Also, informing the applicants that the crew had entered Section 3 caused each SRO applicant to make the determination the rods had dropped to a position of greater than 12 steps from the remaining rods in Control Bank D. Therefore, Section 3, Step 1, RNO sub-step a) would be appropriate for this dropped rod condition (Trip Reactor and enter EOP-0.0A immediately)

- Based on the locations of Control Rods D4 and H8, if they had dropped into the core, then flux distribution of the core would be significantly affected. The magnitude of core flux imbalance was not provided to the applicants

- Per ABN-712, a dropped rod will cause a distortion of the symmetrical flux distribution of the reactor core. This distortion will be reflected as a deviation in the power range and N16 indications. A dropped rod is not defined solely by rod bottom lights

- Applicants are trained to conservatively trip the reactor per ABN-712, Section 3, if there are indications of two dropped rods rather than questioning the degree of misalignment

- The correct answer as approved on the worksheet and answer key is 'D'

- Distractors 'A' and 'B' are incorrect based on Part 1 of the question

- See attached figures of core flux distribution

Reason 2:

- If the stem had informed the applicants that ABN-712, Section 2 was in progress, the correct answer would still be distractor 'C', as Control Rods D4 and H8 were stationary with demand "signals" (i.e., insertion) being applied from the Control Room; therefore, Section 2, Step 2, RNO sub-step b), 3rd bullet would be appropriate (Trip Reactor and enter EOP-0.0A immediately)

- The correct answer as approved on the worksheet and answer key is 'D'

- Distractors 'A' and 'B' are incorrect based on Part 1 of the question

Solution:

CPNPP has determined that Question 82 was keyed incorrectly.

CPNPP recommends changing the correct answer to 'C'

NUREG-1021 justification: The proposed revision is in agreement with NUREG-1021, Rev. 10 ES-403 D.1.b 3rd bullet, which states, "newly discovered technical information that supports a change in the answer key."

NRC Resolution of Question 82

The NRC panel unanimously agreed that the question should be deleted from the examination and does not accept the licensee's solution to change the correct answer to C. There is insufficient information in the stem to determine whether control rods had dropped or how many are misaligned by more than 12 steps.

The stem indicates that a Digital Rod Position Deviation (DRPI) alarm is in. That alarm would come in if one rod deviates from other rods in the group by greater than ± 12 steps. There is no additional information presented that indicated the two bound control rods were both misaligned by more than 12 steps. The stem also did not indicate whether the deviation alarm was due to rods being lower than the rest of the group since the alarm is also valid if one control rod is greater than 12 steps above the rest of the group.

Therefore, the panel determined that there is not enough information presented in the stem to determine that there is more than one control rod position deviating more than 12 steps from the rest of the group; therefore, ABN-712, Section 3, Step 1, cannot be answered. Per NUREG 1021, ES-403.D.1.b, a question with an unclear stem that confused the applicants or did not provide all the necessary information is "most likely to result in post-examination changes agreeable to the NRC."

Because of the above, the panel unanimously determined that SRO Question 82 should be deleted.

Question 93

Plant conditions:

- A Batch Liquid Radioactive Effluent Release is planned

Based on the above plant conditions, complete the following statements.

1. In accordance with STA-603, Control of Station Radioactive Effluents, review and approval of the batch release _(1)_ be delegated to the Unit Supervisor.

2. If the quantity of radioactive material in the Liquid Holdup Tank to be released is 11 Curies, it _(2)_ exceed the limit stated in TR 13.10.33, Explosive Gas and Storage Tank Radioactivity Monitoring Program, Liquid Holdup Tanks.

   A. (1) can
      (2) does
   B. (1) can
      (2) does NOT
   C. (1) can NOT
      (2) does
   D. (1) can NOT
      (2) does NOT

Answer: A

Explanation:

A. Correct. 1st part is correct. The responsibility may be delegated by the Shift Manager to the Unit Supervisor. 2nd part is correct per TR 13.10.33, the limit is 10 Curies.

B. Incorrect. 1st part is correct (see A). 2nd part is incorrect, but plausible because per TR 13.10.33, the limit is 10 Curies and it were 1 Curie less it would be within the limit.

C. Incorrect. 1st part is incorrect because this responsibility can be designated to a Unit supervisor. It is plausible because what can and cannot be designated varies on the responsibility of the Shift Manager. 2nd part is correct (see A).

D. Incorrect. 1st part is incorrect but plausible (see C). 2nd part is incorrect, but plausible (see B).

Licensee Comments on Question 93

During written examination review of the CPNPP 2017 NRC exam, it was identified that the approved answer of Question 93 is contrary to the guidelines provided to Operations Department personnel and how business is conducted at the plant. In particular:

Reason:

- The approved answer on the worksheet and the key is 'A'
- Distractors 'B' and 'D' are incorrect based on Part 2 of the question
- Per Operations Guideline 3, Section 3.2, SRO Expectations, all discharge permits are to be authorized by the Control Room SRO with Command Function and documented in the Station Log
- The question stem does NOT state that the Unit Supervisor has relieved the Shift Manager of the Command Function, leading to 2 of the 3 applicants incorrectly selecting 'C' as the correct answer. The standard operations protocol is only an SRO with Command Function may authorize a release
- Command Function is the responsibility of the Shift Manager and can be turned over to an SRO in the Control Room. However, this is a formal process and must be documented in the Station Log
- Per ODA-102, in order for an SRO to relieve the Shift Manager of Command Function he/she must have an active license and be a member of management
- Per Nureg-1021, Appendix E, Policies and Guidelines for Taking NRC Examinations: "When answering a question, do not make assumptions regarding conditions that are not specified in the question unless they occur as a consequence of other conditions that are stated in the question."
- The applicants stated while taking the examination they did not assume the Unit Supervisor had Command Function and answered the question accordingly

Solution:

CPNPP has determined the approved answer to Question 93 is contrary to the Operations Guidelines and applicants would have to make inappropriate assumptions to answer per the approved exam key.

CPNPP recommends changing the correct answer to 'C'

NUREG-1021 justification: The proposed revision is in agreement with NUREG-1021, Rev. 10, ES-403 D.1.b, 3rd bullet, which states, "newly discovered technical information that supports a change in the answer key."

NRC Resolution of Question 93

The NRC panel unanimously agreed that the question is acceptable as written and does not accept the facility licensee's solution to change the correct answer to C.

During development of this question, the licensee presented STA-603 as the only reference applicable to the second part of this question. Section 5.2 of this procedure states, "The Shift Manager is responsible for reviewing and approving all batch and non-routine radioactive effluent release permits. This responsibility may be delegated to the Unit Supervisor." This indicates that the proposed answer of "CAN delegate" is correct.

After the examination, the licensee presented additional references. OPGD-3, Operations Standards and Expectations, Section 3.2.1, which states that, "All Discharge Permits are to be authorized by the Control Room SRO with Command Function and documented in the Station Log."

Procedure ODA-102, Conduct of Operations, Section 6.5.I, states, "If the SM is to be absent from the Control Room, this command function shall be formally delegated to another active SRO licensed member of management and documented in the Station Log."

The licensee determined that OPGD-3 requires releases to be approved by someone with the command function, and thus cannot be delegated to the Unit Supervisor without also delegating the command function; and, since the stem did not specify that the function had been turned over to the Unit Supervisor, the correct answer should be that the authority could not be delegated.

The panel determined, however, the logic the licensee presented substantiates that the correct answer is that the authority can be delegated. OPGD-3 and ODA-102 both indicate that the command function can be delegated to the Unit Supervisor, thus the authority to review and approve discharge permits has been delegated. The question simply asks CAN the authority be delegated, not HOW the authority is delegated, so whether the Unit Supervisor has assumed the command function is irrelevant.

Because of the above, the panel unanimously determined that SRO Question #93 should remain as-is, with Distractor A as the only correct answer.

Question 99

Unit 1 plant conditions:

- Unit 1 is responding to a plant transient in an ABN
- Shift Manager is in the daily POD meeting at the MSC
- The Unit 1 US has been assigned Command Function

In accordance with ODA-407, Operations Department Procedure Use and Adherence complete the following statements.

1. When using the ABN during the plant transient, it is desirable to write on the _(1)_ copy.

2. A deviation from the ABN is required; the Unit 1 US has approved the deviation. The Unit 2 US _(2)_ authorized to concur with the deviation.

A. (1) working
   (2) is NOT
B. (1) working
   (2) is
C. (1) controlled
   (2) is NOT
D. (1) controlled
   (2) is

Answer: D

Explanation:

A. Incorrect. 1st part is incorrect because per ODA-407, ABN Rules of Usage: During performance of Abnormal Operating Procedures, it is desirable to write on the control copy as a log or place keeping tool. It is plausible because this is not the normal practice. 2nd part is incorrect because when a deviation is required, an SRO must approve the deviation and a second SRO must concur. It is plausible because the Shift Manager is preferred, but not required. Therefore, if thought the shift manager was required, then Unit 2 US would not be authorized to concur.

B. Incorrect. 1st part is incorrect but plausible (see A). 2nd part is correct. The Unit 2 US is authorized to concur with the deviation. Shift Manager permission for a deviation, while preferred, is not a requirement.

C. Incorrect. 1st part is correct. For Abnormal Operating Procedures, it is desirable to write on the control copy. 2nd part is incorrect, but plausible (see A).

D. Correct. 1st part is correct (see C). 2nd part is correct (see B).

Licensee Comments on Question 99

During written examination review of the CPNPP 2017 NRC exam it was identified that the approved answer of Question 99 Part 1 has been removed from all Station Administrative procedures and the change management process failed to address the Operations Department Administrative procedures. In particular:

Reason:

- The term "Controlled" in reference to copies of procedures is no longer used and has been removed from CPNPP station administrative procedures
- The procedure used to develop Question 99, Part 1 (ODA-407), has not been properly updated. This information was discovered during exam review and was not known during development
- An Issue Report (IR) has been generated to document and correct the Issue associated with the change management process in regard to STA-306, Document Control (which was updated), and other department procedures not being updated properly
- The approved answer on the worksheet and the key is 'D'
- Distractors 'A' and 'C' are incorrect based on Part 2 of the question
- Distractors 'A' and 'B' are incorrect based on Part 1 of the question
- Distractor 'D' is incorrect as the term "Controlled" is no longer correct with regards to Station Administrative procedures
- The question has no correct answer as written
- The term "Controlled Copy" was used in the past to identify hard copy procedures which were maintained to the latest Rev/PCN. They were for procedure sets located in areas such as the Control Room and Simulator. These procedures were stamped on the cover page to identify them as controlled copies.
- The current revision of STA-306, Document Control, dated 12/3/15, identifies the location for these procedure sets as "Hard Copy Locations (HCL)," defined as "Recipients of paper reproductions of documents for which distribution is tracked and for which revision control is maintained." The documents in these locations are referred to as "distributed documents". They are no longer stamped nor considered as controlled copies.

Solution:

CPNPP has determined the approved answer to Question 99 is contrary to station administrative procedures and there are no other distractors that are correct.

CPNPP recommends removing Question 99 from the exam.

NUREG-1021 justification: The proposed revision is in agreement with NUREG-1021, Rev. 10, ES-403 D.1.b, 3rd bullet, which states, “newly discovered technical information that supports a change in the answer key.”

NRC Resolution of Question 99

The NRC panel unanimously agreed to accept the licensee’s solution to remove Question 99 from the examination.

Procedure STA-306 clearly removed the use of the term “controlled copies” and this should have been carried forward to ODA-407. Since the licensee does not freeze procedures, there is no correct answer as provided.