

NRC ILE Outline and Operating Test Submittal Comments

2017 FER Power Plant, Unit 2

	<b>Outline Submittal Comments</b>	
RO Administrative JPMs	Chief Examiner Comment	Facility Action/Response
<b>COO1: JP-OP-802-4101-446;</b> Complete Mode 4 Shiftly/Daily Surveillances	Was this surveillance administered on either of the previous 2 NRC exams (2013, 2015) or the audit exam?	This surveillance is new and was not administered on either of the previous 2 NRC or audit exams.
<b>COO2: JP-OP-802-4101-450;</b> Determine the Availability of RPV Level Instruments	Both the RO and SRO perform same COO2 admin JPM. Please replace at least one admin JPM such that one is SRO and the other RO.	As validated, the original Admin JPM validated poorly and would take at least an hour to perform. Replaced with JP-OP-802-4101-431; Perform Core Performance Parameter Check.
<b>EC: 802-4101-441;</b> Identify Isolation Boundaries for a Clearance to Replace Pump Impeller		Replaced with JP-OP-802-4101-452; Identify Isolation Boundaries for Steam Leak. Based on feedback from validation crew.
<b>RC: JP-OP-802-4101-416;</b> Enter and Exit a Contaminated Area	Both the RO and SRO perform same RC admin JPMs. Please replace at least one admin JPM such that one is SRO and the other RO.	Replaced with 802-4101-416; Determine Dose and Complete a Red Card. Original JPM would be difficult to perform during plant outage.
SRO Administrative JPMs	Chief Examiner Comment	Facility Action/Response
<b>COO1: JP-OP-802-4101-440;</b> Complete Mode 5 Shiftly/Daily Surveillances	Was this surveillance administered on either of the previous 2 NRC exams (2013, 2015) or the audit exam?	1) This surveillance is new and was not administered on either of the previous 2 NRC or audit exams. 2) Modified to JP-OP-802-4101-440; Review Mode 5 Shiftly/Daily Surveillances (PMT). Determination of component operability is more of an SRO function, and also reduces steps from 35 to 6 (decrease JPM time).
<b>COO2: JP-OP-802-4101-450;</b> Determine the Availability of RPV Level Instruments	Both the RO and SRO perform same COO2 admin JPM. Please replace at least one admin JPM such that one is SRO and the other RO.	As validated, the original Admin JPM validated poorly and would take at least an hour to perform. Replaced with JP-OP-802- 4101-431; Perform Core Performance Parameter Check.

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<p><b>RC: JP-OP-802-4101-416</b>; Enter and Exit a Contaminated Area</p>	<p>Both the RO and SRO perform same RC admin JPMs. Please replace at least one admin JPM such that one is SRO and the other RO.</p>	<p>Replaced with 802-4101-435; Notify Hospital of Contaminated Injured Worker. Original JPM would be difficult to perform during plant outage.</p>
<p><b>Scenario ES D-1</b></p>	<p><b>Chief Examiner Comment</b></p>	<p><b>Facility Action/Response</b></p>
<p>Scenario 1</p>	<p>Scenario 1 is similar to 2013-1 exam scenario. (ES-301, Section D.5.b). Or was it a spare on 2013 exam?</p>	<p>It was significantly modified.</p>

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	<b>Operating Test Submittal Comments</b>	
	<b>RO/SRO Admin JPMs Comments</b>	
	Chief Examiner Comment	Facility Action/Response
<b>RO Admin A1.2</b> <b>COO2: JP-OP-802-4101-431</b> ; Perform Core Performance Parameter Check	JPM Step 2 (16.b.2(b)), "Verify....." is not critical.	Revised.
<b>RO Admin A2</b> <b>EC: JPM-802-4101-452</b> ; Identify Isolation Boundaries for Steam Leak.	Update forms to use current revisions.	Recent revision change, updated.
<b>RO Admin A3</b> <b>RC JPM 802-4101-416</b> ; Determine Dose and Complete a Red Card	Change JPM to increase accumulated dose for the year to 1753 mr to allow use of the original survey map with much lower dose values to make the JPM more believable. JPM was changed from original submittal because the Fermi 2 administrative limit was changed to 2 mr.	JPM modified as described. No change to JPM steps, only calculation values.
<b>SRO Admin A1.2</b> <b>COO2: JP-OP-802-4101-431</b> ; Perform Core Performance Parameter Check	JPM Step 2 (16.b.2(b)), "Verify....." is not critical.	Revised.

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<b>RO/SRO CR/IP System JPMs Comments</b>		
	Chief Examiner Comment	Facility Action/Response
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<b>SIM JPM S7(g)</b> <b>JP-OP-802-4101-445</b> ; SRM/IRM Overlap Verification and SRM Withdrawal During Startup	Incorporate critical JPM Step 3 into Step 2 and make Step 2 critical. Renumber JPM steps accordingly.	<b>Lic:</b> Incorporated.
<b>SIM JPM S8(h)</b> <b>JP-OP-315-0166-002</b> ; Restore RBHVAC to Operation After Auto Isolation	JPM Steps 3 and 4 not critical.	<b>Lic:</b> Incorporated.
<b>IP JPM P3(k)</b>	<b>NRC:</b> In-Plant Systems JPM (k) JP-OP-315-0167-005, "Shift RBCCW Supplemental Cooling Chilled Water to Mode 2" was changed to "Adjust Chilled Water Temperature Set-point".	<b>Lic:</b> The change was based on the ALARA principle that during licensee validation 3 radiological hot spots were identified in the area of the JPM and during JPM performance significant dose could be obtained.

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	<b>Scenario Comments</b>	
	Chief Examiner Comment	Facility Action/Response
<b>Scenario 1</b>	<ol style="list-style-type: none"> <li>1. Incorporate Events 3 and 4 into Event 2 and renumber events.</li> <li>2. Event 5, add TS condition.</li> <li>3. Event 7, add TS condition, move CT 1, RPV-LEVEL, to Event 10, Drywell Leak.</li> <li>4. Event 9, rename CT 2, RPV-ED, and move to Event 10, Drywell Leak.</li> <li>5. Event 10, rename CT 3, RPV-TAF.</li> <li>6. Event 10, rename CT 4, PC-DWS, and move to Event 12. Delete CT 5.</li> </ol>	<ol style="list-style-type: none"> <li>1. Incorporated Events 3 and 4 into Event 2 and renumbered events.</li> <li>2. Added TS condition to Event 5 (now Event 3).</li> <li>3. Added TS condition to Event 7 (now Event 5). Moved CT 1 to new Event 7 (Drywell Leak).</li> <li>4. Renamed and moved CT 2 to new Event 7 (Drywell Leak).</li> <li>5. Renamed CT 3, now part of new Event 7.</li> <li>6. Renamed CT 4, now part of new Event 8. Deleted CT 5.</li> </ol>
<b>Scenario 2</b>	<ol style="list-style-type: none"> <li>1. Event 2, add conditions to each of the 4 TSS. Combine Event 3 into Event 2.</li> <li>2. Event 5, delete CT 1 to reduce power with CRAM Array rods.</li> <li>3. Relabel CT 2 as CT 1, ATWS-ADS.</li> <li>4. Relabel CT 3 as CT 2, ATWS-SLC.</li> <li>5. Relabel CT 4 as CT 3, ATWS-RODS.</li> <li>6. Relabel CT 5 as CT 4, ATWS-T&amp;P, and add CT 5, ATWS-INJ.</li> </ol>	<ol style="list-style-type: none"> <li>1. Added conditions to TSSs, incorporated Event 3 into Event 2, and renumbered events.</li> <li>2. Deleted CT 1 for Event 5 (new Event 4).</li> <li>3. Incorporated comment (now CT 1, ATWS-ADS, new Event 5).</li> <li>4. Incorporated comment (now CT 2, ATWS-SLC, new Event 6).</li> <li>5. Incorporated comment (now CT 3, ATWS-RODS, new Event 7).</li> <li>6. Incorporated comment (now CT 4, ATWS-T&amp;P, and CT 5, ATWS-INJ, new Event 8).</li> </ol>
<b>Scenario 3</b>	<ol style="list-style-type: none"> <li>1. Event 2, change event to have rod drift out, vices, into the core. More significant reactivity event, but will lose the TS.</li> <li>2. Incorporate Event 4 into Event 3 and renumber Events. Add condition to TR.</li> <li>3. Event 5, delete TS.</li> </ol>	<ol style="list-style-type: none"> <li>1. Incorporated comment.</li> <li>2. Incorporated comment.</li> <li>3. Incorporated comment.</li> </ol>