

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

	Outline Submittal Comment	Facility Action/Response
Written Exam Outline	Please provide a statement for how the written exam outline was systematically and randomly prepared. (ES 401 D.1.b 2 nd paragraph)	Followed ES-401, Att B. Will provide statement when proposed exam submitted (discussed with Br. Chief)
Written Exam Outline	Duplicate generic KAs between Tier 3 and other two Tiers: 2.1.30, two on RO section; 2.4.6, two on SRO section; 2.1.20, 2.2.40, and 2.4.4 have one on both RO and SRO sections-therefore SROs will see the KA twice. (Total of 5 examples for SROs)	Have reviewed submitted questions. No duplication or overlap, or obtaining answers from other question.
Written Exam Rejected KAs	Please provide a copy of the site's prescreened list of KAs, if this method was used. (ES 401 D.1.b, and paragraph top of page 5 of 50)	Have copy to send to NRC, but already sent one to C. Zoia. NRC: No need to send another if CZ has already requested and obtained copy. Licensee will need to verify against new KA Catalog and ES 1021, Rev 11.
JPMs-Admin	Please explain the process used to select which Admin JPMs are reused from the previous 2 NRC exams. (If the SRO JPM for Conduct of Ops-Determine Risk was on the 2013 and 2015 exams, how did it appear again on this exam? ES 301 D.2.a)	Will verify how selected, but believe this JPM was selected for 3 rd time.
JPMs-Admin	Please explain how the RO JPM for Equipment Control has been modified to alter the course of action of the JPM from the bank JPM. (If the bank JPM had the applicant perform the STP, how is this significantly different? ES 301 D.2.a)	Believe this JPM different from previous because applicant is required to find errors, identify the impact, and document.
JPMs-System	Again, please explain the process used to select which System JPMs are reused from the previous 2 NRC exams. (ES 301 D.2.a)	Will verify how selected.
JPMs-System	Is JPM i the same as JPM j from the previous (2015) NRC exam? (Is 'Operate RCIC from 1C208' the same as 'Reset RCIC overspeed trip'?)	This is not same JPM, completely different. Previous JPM was at RSP, this JPM done locally at RCIC.

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

	Outline Submittal Comments	Facility Action/Response
Scenario ES-D-1	<p>1) Scenario 3: What are the Initial Conditions for the Scenario – 100% reactor power?</p> <p>2) Please Verify that, as a minimum, Scenarios 1 or 2 are new or significantly modified, so each applicant sees at least one new or modified scenario.</p>	<p>1) Scenario starts at 100% power. Will identify on D-1.</p> <p>2) Scenario 2 is NEW, not seen by applicants.</p>

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

Operating Test Submittal Comments		
	Admin JPMs	Licensee Response/Resolution
RO A.1.1 COO1	Remove the procedure references from the Initiating Cue, just ask applicant if he is allowed to assume the watch, why, or why not, and if why not, give the(all) reason(s).	
RO A.1.2 COO2		
RO A.2 EC		
RO A.3 RC	1) JPM Step 3 should be 615mR vice 600mR. 2) JPM Steps 4 and 5, what is the DAEC Admin limit?	1) Incorporated 2) DAEC admin WB limit is 1000mr.
SRO A.1.1 COO1	1) Move 3 rd bullet from Initiating Cue to the Initial Conditions, ie, "...all equipment unavailable at same time." 2) JPM Step 1, change Evaluator Cue to Evaluator Note.	
SRO A.1.2 COO2	We are asking applicant to determine all INE time requirements for the event. How many INE time requirements apply? What are they and should they be listed?	
SRO A.2 EC	1) Only 1 critical JPM step. JPM Step 1 is identified as critical, but it is "errata" because job was obviously completed based on rest of WO. At least 2 critical steps are needed. 2) JPM Step 2, giving credit for both not signing, and signing the WO? Why is applicant given credit for partially completing the task, ie, NOT signing the WO? Appears that correct action would be to sign off the WO and identify that actions need to be performed to address the identified issues. NOTE: Applicant would have to identify both the QC initials missing and stroke time issue. Need to verify requirement for signing WO.	1) Step is QC (ie, Quality Control) initial, therefore, it is critical.

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

Operating Test Submittal Comments		
	Admin JPMs	Licensee Response/Resolution
SRO A.3 RC	<p>1) The Initial Conditions and Initiating Cue point the applicant to verifying torus level. Rather than giving the IC03 readings for DW and Torus Pressure, those should be part of what the applicant asks for. Give applicant the indicated Torus Level.</p> <p>2) Make pressure such that it is >24psig and applicant would identify that they couldn't vent the Torus, but would vent the DW instead.</p>	
SRO A.4 EP	Give evaluator a "highlighted" place-keeping key to show where applicant info will go.	

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

Operating Test Submittal Comments		
	Simulator/CR/IP System JPMs	Licensee Response/Resolution
SIM JPM 1a		
SIM JPM 2b (SRO-U)	JPM Step 2: Evaluator Note, should be HS-2003A vice HS-2003?	Will verify.
SIM JPM 3c (SRO-U)		
SIM JPM 4d-Alt		
SIM JPM 5e		
SIM JPM 6f-Alt (SRO-U)	Not Alternate Path JPM. Task is to transfer from Alternate Power to RPS MG. What is the alternate path for transferring power? APRM "C" failing upscale, bypassing "C" APRM and resetting the half scram is not an alternate path for this task.	
SIM JPM 7g-Alt		
SIM JPM 8h	1) JPM Step 8 is only critical step and it is not a verifiable action performed by the applicant. It requires applicant in the plant to operate a valve. Need 2 critical steps that are verifiable actions performed by the applicant. 2) JPM Steps 12, 13 and 14 don't appear to be critical.	
IP JPM 9i		
IP JPM 10j-Alt (SRO-U)	1) Only 1 critical step. JPM Step 11 not critical because fuel rack is tripped to place SBDG in Standby, but then reset to start the SBDG on SCRAM. Need 2 critical steps. 2) Not Alternate Path, task is to put the SBDG in Standby. Receiving a SCRAM and restarting the SBDG is another task, not alternate path for current task.	

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

	Operating Test Submittal Comments	
	Simulator/CR/IP System JPMs	Licensee Response/Resolution
IP JPM 11k (SRO-U)	JPM Step 7, Standard-Replace "Reviews" with "Informs."	

NRC ILE Outline and Operating Test Submittal Comments

2017 Duane Arnold Energy Center

CE: ME Bielby

	Scenario D-1 NRC Comments	Licensee Response/Resolution
Scenarios in General	1) Add D-1 sheet as cover page on each scenario, with the malfunctions, and expected events identified for the SRO, ATC and BOP. 2) Break down RO into ATC and BOP positions and add their expected actions. 3) Identify the expected panels that the ATC and BOP are supposed to be responsible for.	
Scenario 1	1) Rod Drift out of core has more discriminating actions than Rod Drift into core. 2) Identify Defeat 4 and 11 purpose. 3) Identify the TS LCO actions for Event 3 (S/U Xfmr OOS) in the event writeup.	
Scenario 2		
Scenario 3		
Scenario 4		