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REGION III

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Report Nos: 50-373/97017(OL); 50-374/97017(OL)

Licensee: Commonwealth Edison Company

Facility: LaSalle County Station, Units 1 and 2

Location: 2601 N. 21st Road
Marseilles, IL 61341

Dates: October 20 - 24, 1997; January 21-22, 1998

Inspectors: M. Bielby, Lead Inspector, RIII NRC
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Approved by: M. Leach, Chief, Operator Licensing Branch
Division of Reactor Safety

EXECUTIVE SUMMARY

LaSalle County Station, Units 1 and 2
NRC Inspection Reports 50-373/97017(OL); 50-374/97017(OL)

This inspection report contains the findings and conclusions from the inspection of the licensed reactor operator and senior reactor operator requalification training programs. The inspection included a review of training administrative procedures; review of written and operating examination material; observation and evaluation of operator performance and licensee evaluators during a requalification operating examination; an assessment of simulator fidelity; an evaluation of program controls to assure a systems approach to training; and a review of requalification training records. In addition, the inspectors observed routine activities in the control room. The inspectors used the guidance in inspection procedures 71001 and 71707.

Licensed operator requalification programs were generally implemented in accordance with 10 CFR Part 55 requirements.

- Control room operators demonstrated appropriate knowledge of plant conditions and equipment status, proper access control, and proper communications practices.
- Crew and operator performance was poor during scenarios, and marginal during job performance measures (JPMs). Overall communications were inconsistent and sporadic. A lack of attention to emergency operating procedure parameters caused crew failures in the simulator. A number of operators had difficulty with a remote shutdown panel task. (Section O1.2)
- Generally, the requalification examination material contained the necessary minimum quantitative and qualitative attributes to provide an adequate evaluation of operator skills; however, the licensee needed to enhance pre-exam reviews of the examination material to ensure consistency of evaluations. (Section O5.2)
- Licensee administration and evaluation of scenario performance was good; however, the inspectors identified several deficiencies for administering and evaluating JPMs, including lack of quality verification and coordination of simulator JPMs. (Section O5.3)
- Overall examination material security and control of examinees was good. No potential examination compromise was identified. (Section O5.3)
- The following requalification training program weaknesses were identified: JPMs were not used, mitigating operator actions based on Probabilistic Risk Assessment and Final Safety Analysis Report information had not been incorporated, and there were no formal lesson plans for management expectations. (Section O5.4)
- Operator license conditions were in conformance with program guidance and regulatory requirements. (Section O5.5)

Reports Details

I. Operations

O1 Conduct of Operations

O1.1 Control Room Observations

a. Inspection Scope (71707)

The inspectors noted that both units were shutdown in late September 1996 and remained shutdown through the inspection period with one unit also defueled. The inspectors observed routine control room activities, performed panel walk-downs, and questioned operators about plant and equipment status.

b. Observations and Findings

Control room operators conducted themselves in a professional manner and were attentive to their respective panel indications. Access control to the main control room area and verbal communication practices were consistent with management expectations and guidelines. The control room noise level was minimal and no annunciator alarms were left unattended or in a prolonged alarm state. Upon questioning by the inspectors, the operators demonstrated satisfactory knowledge of plant conditions and equipment status.

c. Conclusions

The inspectors concluded that an appropriate level of awareness existed in the control room to ensure safe and effective control of the plant and associated systems.

O1.2 Operator Performance - Operating Examination

a. Inspection Scope (71001, 71707)

The inspectors observed the performance of two operating crews during the requalification examination. Each crew consisted of four licensed operators and one licensed shift technical advisor (STA). Each operating examination consisted of routine and emergency activities evaluated in two dynamic simulator scenarios, three simulator Job Performance Measures (JPMs) and two inplant JPMs.

b. Observations and Findings

Overall, the dynamic scenario performance of both crews was poor based on failure of at least one critical task in one of two scenarios. During routine activities, including the performance of surveillance testing and normal reactor power changes, both crews performed well. They demonstrated good self and peer checking techniques. Although crew briefs were generally timely and concise during abnormal and emergency

operations, crew and individual performance was poor. Overall communications were inconsistent and sporadic. Sometimes orders were concise, other times they were lengthy. Sometimes repeatbacks or acknowledgments were dropped. However, the inspectors observed that the operators requested repeatbacks when they were dropped. Although crew briefs were generally concise and timely, there were instances when they were untimely, and the unit supervisor (US) didn't wait for a complete crew response before the brief was started. Half of the operators received evaluation comments for various types of poor communications.

Command and control was considered poor at times because a lack of attention to major Emergency Operating Procedure (EOP) parameters resulted in unsatisfactory crew performance. One crew was evaluated as unsatisfactory because they failed to direct emergency depressurization (ED) prior to drywell temperature exceeding 340 degrees Fahrenheit (F). The crew had correctly diagnosed increasing drywell temperature early in the event due to an Anticipated Transient Without Scram (ATWS), and steam break with main steam isolation valves isolated. However, they did not remain cognizant of the increasing drywell temperature. Another crew was evaluated as unsatisfactory because they failed to direct ED after a loss of coolant accident concurrent with loss of high pressure feedwater when reactor water level reached the top of active fuel, -161 inches. ED was eventually directed after reactor water level reached -192 inches.

Basic individual operator diagnostic skills were marginal. Examples included: failure to terminate and prevent feedwater injection when required, failure to identify standby liquid control pump was running with no injection, failure to identify a residual heat removal (RHR) pump was running with no injection, and failure to restore control rod drive pump to operation when required. Only one licensed operator on each crew was evaluated as satisfactory in both scenarios.

Overall operator performance of JPMs was marginal, although some deficiencies could be attributable to the poor JPM quality verification and coordination, and a lack of JPM training (see Sections O5.3 and O5.4). One inplant JPM required the operator to obtain jumpers from the EOP locker. One operator could not find the actual inplant control room EOP locker; however, he noted that the simulator control room EOP locker was located in a different place.

A majority of the operator performance deficiencies were identified during performance of simulator JPM, S-RX-08, Revision 3, "Shutdown of Suppression Pool Cooling, Startup B Residual Heat Removal in Shutdown Cooling," from the simulator remote shutdown panel (RSP). During performance of this JPM, the operators demonstrated poor operating practices and decision making. One of the initial conditions noted that control power had been transferred to the RSP. However, several of the RSP control power supply transfer switches were in the incorrect "NORMAL," vice "EMERGENCY," position. The purpose of these switches being in the incorrect position was to support the other JPMs that were being conducted simultaneously from the simulator control room panels. One of the effects of the emergency transfer switches being out of position was that RSP reactor pressure and reactor water level could not receive inputs

from the "actual" simulator control room parameters. The RSP reactor water level had been "frozen" at approximately 52 inches. A majority of the operators who performed the JPM were confused by the discrepancy between the JPM initial conditions and the actual RSP control power transfer switch positions of some switches. Regardless, the following performance issues were identified:

- Only some of the operators questioned the position discrepancy of the RSP control power switches.
- The associated JPM procedure required reactor pressure to be less than 100 psig prior to starting RHR in shutdown cooling mode (SDC). One operator ignored the reactor pressure requirement altogether. Although the licensee had not intended for the operators to reposition any of the RSP control power transfer switches, another operator repositioned the associated RSP reactor water level and pressure indication switch, and observed that RSP reactor pressure indicated 120 psig. Regardless, the operator still placed B RHR in SDC.
- Although not originally part of the JPM, another operator observed the indicated RSP reactor water level indication decrease from 52 to 5 inches while suppression pool level increased from 1 to 3 inches. The evaluator cued the operator that reactor water level remained greater than 50 inches; however, the operator never questioned the suppression pool level increase.
- While placing B RHR in SDC and adjusting the flowrate using valve "-F053B," RSP flow indication became very erratic. The operator observed the flow but took no immediate action, such as tripping the pump, due to unexpected system response.
- One of the initial cues identified that RHR system venting was complete; however, one operator directed venting anyway.

c. Conclusions

The inspectors concluded that both crews and individuals demonstrated poor performance during abnormal and emergency plant operation during dynamic simulator scenarios. Additionally, during performance of JPMs, the inspectors observed a lack of procedural adherence, lack of questioning attitude, and unfamiliarity at performing JPMs. The inspectors concluded that the identified poor operator performance needs improvement.

O5 Operator Training and Qualification

O5.1 Operating History

a. Inspection Scope (71001)

The inspectors reviewed the following to assess the licensed operator requalification training program's effectiveness regarding operator performance:

- SALP 13 report No. 50-373/374-96001.
- Resident inspector reports covering the time frame of 1996 through 1997.
- Licensee event reports covering the time frame of 1996 through 1997.
- Licensed operator requalification inspection results contained in NRC integrated inspection report No. 50-373/374-96005.
- High Intensity Training (HIT) Program inspection report No. 50-373/374-97014.

b. Observations and Findings

The inspectors noted that operator performance errors as documented in the above reports were attributable, in part, to a lack of procedural adherence and inadequate procedures. The inspectors noted that the licensee was continuing to take actions to improve operator performance pertaining to procedure usage. The licensee's action items centered around procedure use and compliance, and overall procedure development. Additional licensee efforts to identify, correct, and improve overall operator performance included implementation of the HIT Program in March 1997. The program rigorously implemented high standards for measuring crew performance during evaluations of dynamic simulator scenarios and resulted in the identification of additional operator performance deficiencies for emergency plan classification and reporting, command and control, and communications. However, the written examinations were of marginal quality, and the JPMs were not used to evaluate individual operator performance of safety significant tasks.

c. Conclusions

Based on past inspection reports, the inspectors concluded that licensed operator requalification training had not been effective at reducing operator performance errors due to procedural adherence and inadequate procedures. The HIT program was effective at correcting some operator performance deficiencies; however, the combination of a marginal written examination and a lack of JPM usage decreased the effectiveness of an overall evaluation of individual operator knowledge and performance ability for important safety significant tasks. As a result, the licensee continued to correct recurring operator performance issues through its licensed operator requalification training program.

O5.2 Requalification Examination Material

a. Inspection Scope (71001)

The inspectors reviewed the written and operating examination material using the Appendix A checklists in Inspection Procedure 71001. This review included a comparison of dynamic scenarios, written questions, and JPMs with previously administered examinations.

b. Observations and Findings

Overall, the scenarios were challenging, used integrated and related events, contained an adequate number of malfunctions after EOP entry, and did not repeat tasks between scenarios or JPMs. However, inconsistencies were identified between: the listed objectives and scenario content, and the identification and evaluation of scenario events.

Some scenario guides listed emergency event classification as an objective while other scenarios required the classification, but omitted it as an objective. In one case, the objectives listed in the scenario guide did not match the events and expected operator actions.

Some of the scenario guides omitted significant expected operator actions, such as inhibiting the Automatic Depressurization System, entering specific EOP procedures, or placing the low pressure Emergency Core Cooling Systems (ECCS) in pull-to-lock prior to ED. Operator performance could not always be evaluated, as listed in the scenario guide, because the associated events did not require verifiable operator actions. For example, operator performance could not be evaluated for events with ADS responses that occurred as expected. Conversely, operator performance could have been evaluated if a mitigating action would have been required due to a failure of the automatic response. Sometimes the evaluation of individual operator competencies listed in the scenario was lost because of the rapid sequencing of events. For example, one scenario identified operator actions for entering Technical Specification (TS) Limiting Condition for Operation for main steam tunnel delta-T inoperable, high drywell air temperature, and a loss of 136X switchgear. However, due to the rapid sequencing of these events, the operators never opened the TSs and the operators ability to use the TSs was not evaluated in that scenario. Several events were "double counted." For example, scenario Opexam 18A counts a loss of Station Auxiliary Transformer event as a malfunction, a post EOP failure, and a major transient. Additionally, one scenario did not identify a critical task. Scenario Opexam 38A contained an ATWS event. The success path required operator action to insert control rods, but the action was not identified as a critical task.

The written examination was operationally oriented. Both the open reference and static examination portions had an adequate level of difficulty and sampling of topics. The static portion made good use of the simulator to answer questions. Approximately a third of the open reference examination contained questions that could be considered

"direct lookup" because the answers were taken directly from procedural steps or cautions.

The JPMs identified appropriate critical steps and termination criteria required for successful completion. Generally, the JPM difficulty level was appropriate; however, one of the JPMs only required event classification for a degraded DC power division in cold shutdown. The inspectors considered the JPM difficulty too low because it was almost a direct lookup. Another JPM initiating cue directed the operator to initiate shutdown cooling and establish a cooldown rate (CDR) not to exceed 100 degrees Fahrenheit per hour (F/hr). However, the JPM did not contain criteria for establishing or maintaining the CDR. As a result, licensee evaluators terminated the JPM after operator merely noted they would establish a CDR of 100 degrees F/hr without demonstrating the ability, or understanding, for establishing and maintaining the CDR.

c. Conclusions

The inspectors concluded that, in general, the requalification examination material contained the necessary minimum quantitative and qualitative attributes to provide an adequate evaluation of operator skills. The inspectors determined that the licensee needed to enhance pre-exam reviews of the examination material to ensure consistency of evaluations.

O5.3 Requalification Examination Administration and Evaluation Practices

a. Inspection Scope (71001)

The inspectors observed the licensee administer operating examinations and evaluated two operating crews' and individuals' performance during dynamic simulator scenarios and JPMs. Each crew consisted of five licensed operators including an STA. Each crew member was required to perform in two dynamic scenarios and a set of five JPMs. The inspectors attended the evaluator critiques of crew and individual operator performance after completion of the dynamic scenarios.

b. Observations and Findings

Licensee evaluations of JPM performance was not complete at the conclusion of the examination week. However, the licensee's evaluation team identified unsatisfactory performance by both operating crews and 8 of 10 operators during the simulator scenarios. After observing four dynamic simulator scenarios, the licensee evaluators noted the following deficiencies in operator performance: (1) inconsistent use of 3-legged communications, (2) poor command and control by the USs and STAs for not monitoring all significant EOP parameters, and (3) poor diagnostic skills (see Section O1.2 for further details). The inspectors agreed with the evaluations and noted that recommended remedial actions were being documented to deal with the deficiencies. During the exit meeting, the licensee identified corrective actions to improve operator diagnostic skills through future requalification training.

The inspectors observed several deficiencies during the licensee's administration of JPMs, including: inappropriate scheduling and coordination of JPMs, one case of a JPM evaluator repositioning switches during administration of a JPM, inconsistent evaluator cuing, and non-uniform test conditions due to a lack of established methods for control of plant parameters by the simulator operator. Additionally, some operator performance issues were not identified by the licensee evaluators.

A large number of the JPM administration deficiencies were identified during performance of JPM, S-RX-08, Revision 3, entitled, "Shutdown of Suppression Pool Cooling, Start of Residual Heat Removal in Shutdown Cooling," from the simulator remote shutdown panel. During performance of this JPM, the operators were forced into poor operating practices and decision making, primarily due to inappropriate quality verification and concurrent performance of the JPM with other simulator control room JPMs that affected reactor water level and pressure as illustrated by the following observations:

- One of the JPM initial conditions noted that control power had been transferred to the remote shutdown panel; however, several of the remote shutdown panel control power supply transfer switches were in the incorrect "NORMAL," vice "EMERGENCY," control power position to support the other JPMs that were being conducted simultaneously.
- On one occasion, after an operator questioned the evaluator about the switch position discrepancy, the evaluator inappropriately repositioned an emergency control power supply switch to the "EMERGENCY" position. This action resulted in unplanned parameter indications for reactor water level and pressure.
- After a licensee evaluator inappropriately repositioned the emergency control power supply switch, reactor pressure came on scale and indicated 120 psig. Regardless, the operator continued on with the JPM, and the licensee evaluator failed to document poor operator performance based on a procedural requirement that reactor pressure be less than 100 psig for starting RHR in SDC.
- Simulator JPM steps did not match the simulator procedure steps for LOA-RX-101, Revision 7, because the simulator procedure was out of revision.
- On one occasion, the inspectors observed reactor water level indication decrease from 50 to 5 inches due to the reactor water level and pressure indication emergency control power supply switch being placed in the "EMERGENCY" position; however, the licensee could not explain a concurrent suppression pool level increase from 1 to 3 inches.
- During the initial performance of simulator JPM, S-RI-09, Revision 4, "Inadvertent Initiation of reactor core isolation cooling (RCIC)," RCIC could not be re-aligned for normal operation because the simulator malfunction still had an initiation signal inserted.

Another weakness observed during JPM administration was inconsistent cuing by the JPM evaluators. There were examples of both good and poor cues. One example of a good cue was:

- The inspectors observed an operator direct another operator in the field to vent the RHR system that had been identified as completed in the JPM initial conditions. The evaluator (acting as the field operator) communicated back, "So, you want me to perform those steps again?" The operator then reviewed the initial conditions and realized his error.

The poor cues observed by the inspectors generally provided information that either was not specifically asked for or did not accurately represent system response. Examples of those poor cues included:

- While placing B RHR in SDC and adjusting the flowrate using valve "-F053B", RSP flow indication became very erratic. The operator observed the flow, but took no immediate action such as tripping the pump. After it was clear that the operator was not going to take action, the evaluator told the operator that flow was 6000 - 7000 gpm (normal), instead of evaluating the operator's response.
- In order to verify that no reactor recirculation pumps (RRPs) were running, operators requested jet pump delta-pressures. On two different occasions, instead of providing the readings and letting the operator decide if the RRP's were running, the evaluator told the operator that "...no RRP's are running."
- During performance of an inplant JPM for venting of a scram air header, on one occasion the evaluator cued the operator that the scram air header was venting and the hydraulic control unit accumulators were discharging even though the vent path isolation valve was still closed.

The inspectors observed inconsistent control of plant parameters by the simulator operator. During the conduct of simulator JPMs, plant conditions were different for operators performing the same JPM. Plant conditions were dependent upon how long the simulator had been out of "freeze," and which JPMs were in progress. For example, during the conduct of JPM, S-R1-09, RCIC was to be secured after inadvertent initiation. One operator experienced reactor water level decrease from 60 to 10 inches in about 15 minutes. The operator was distracted by various low reactor water level alarms and engineered safety function actuations. Another operator that performed the same JPM had reactor water level remain steady at 60 inches. During performance of remote shutdown panel JPM, S-RX-08, some operators observed suppression pool level and reactor water level remained steady. For other operators, reactor water level decreased and suppression pool level increased, which indicated a possible reactor to suppression pool drain path. Due to the lack of a good quality verification and coordination of simulator JPMs, operator evaluations were inconsistent, and made it difficult to identify the root cause for poor performance.

Appropriate security measures were taken throughout the examination process. Individual operators were sequestered and separated into appropriate groups during each portion of the examination process and examination material was well controlled. No potential examination compromise was identified.

One new simulator fidelity issue was identified during the examination observation (See Enclosure 2, Simulation Facility Report).

c. Conclusions

Licensee evaluators did a good job of documenting and evaluating both strong and weak scenario performance based on critical tasks and competencies. The inspectors agreed with the licensee's evaluations of satisfactory and unsatisfactory scenario performance.

The inspectors identified several deficiencies for administering JPMs. The quality verification and coordination of simulator JPMs led to inconsistent operator evaluations. Licensee evaluators cuing was sometimes inappropriate. At times, licensee evaluators and operators were unfamiliar with the JPM format.

Overall examination material security and control of examinees was good. No potential examination compromise was identified.

O5.4 Requalification Training Program Deficiencies

a. Inspection Scope (71001)

The inspectors reviewed the following training materials for quality and content, in accordance with the checklists contained in Appendix A of IP 71001:

- The JPM exam bank
- Examination sample plans
- Training schedules
- Annual operating tests administered during the current cycle
- ACMI, Revision 13, "Administration and Course Management Instruction for Licensed Operator Requalification Program"
- Licensee interviews.

b. Observations and Findings

Several deficiencies were noted in the overall content of the requalification training program, which included: (1) the infrequent conduct of JPMs during the training

program, (2) the lack of a formal incorporation of PRA into the training program, and (3) the lack of formalized training and examination on management expectations, conduct of operations, and use of administrative procedures.

During interviews with training staff, and based upon reviews of the licensee's requalification training procedure, ACMI, Revision 13, "Administration and Course Management Instruction for Licensed Operator Requalification Program", the inspectors determined that the licensee only conducted JPMs during the licensed operator annual operating examination. JPMs were not used during the remainder of the requalification training program. The inspectors considered the lack of training JPMs as a program weakness for three reasons: (1) operators did not receive individual training and evaluation on many safety significant tasks, (2) operators were not as well prepared for the JPM format of the annual operating examination, and (3) the training staff was not as well prepared to administer the JPM format. The training staff asserted that a sufficient number of safety-related tasks were performed during dynamic simulator training exercises; however, based on the inspector's observation of operator performance and licensee evaluations during JPM administration (Sections O1.2 and O5.3) that assertion was not supported. The licensee acknowledged at the exit meeting that they will be incorporating JPM type tasks on an individual operator basis during the course of the next requalification training period.

The licensee acknowledged a lack of formal incorporation of PRA into the requalification program. In addition, operator actions identified in the Final Safety Analysis Report (FSAR) as important to mitigating accidents also had not been incorporated into requalification training. At the time of this inspection, the licensee had completed a review, and prepared lesson plans and scenarios, to incorporate PRA and FSAR information into the next requalification training cycle.

The inspectors also identified a lack of formal incorporation of training on conduct of operations, management expectations, and use of administrative procedures into the requalification training program. These topic areas contained no formal lesson plans or learning objectives, and were infrequently trained and examined on during requalification training. They were trained on as a part of the HIT program; however, they were not incorporated into the licensed operator requalification training program.

c. Conclusions

The licensed operator requalification training program has deficiencies that require attention. The lack of performing and evaluating JPMs during normal requalification training can explain the poor operator performance and licensee evaluations on JPMs observed by the inspectors. The requalification training program was weak in that PRA and FSAR information and management expectations were not incorporated

O5.5 Conformance with Operator License Conditions

a. Inspection Scope (71001)

The inspectors reviewed the licensee's medical and operator qualification programs, and selected records to assess licensed operator compliance with regulatory requirements. This review included a sampling (10 percent) of the available medical records.

b. Observations and Findings

The licensee maintained a copy of individual medical records at their corporate facility. The inspectors determined the records contained appropriate documentation to validate operator qualifications to perform license duties. No physical examination dates exceeded the program-allowed date and no violation of regulatory requirements were identified.

c. Conclusions

The inspectors concluded that the operators' license conditions were in conformance with program guidance and regulatory requirements stated in 10 CFR Part 55.53 and 10 CFR Part 55.21.

VI. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management on February 3, 1998. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials held by the inspectors following the inspection could be considered proprietary. No proprietary information was identified.

Attachment: Simulation Facility Report

PARTIAL LIST OF PERSONS CONTACTED

ComEd

D. Farr, Operations Manager
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INSPECTION PROCEDURES USED

IP 71001, "Licensed Operator Requalification Program Evaluation"
IP 71707, "Plant Operations"

ITEMS OPENED, CLOSED, AND DISCUSSED

None

LIST OF ACRONYMS USED

ATWS	Anticipated Transient Without Scram
CDR	Cool-down Rate
DRS	Division of Reactor Safety
EOP	Emergency Operating Procedure
ED	Emergency Depressurization
FSAR	Final Safety Analysis Report
HIT	High Intensity Training
JPM	Job Performance Measure
NRC	Nuclear Regulatory Commission
PDR	NRC Public Document Room
PRA	Probabilistic Risk Assessment
RSP	Remote Shutdown Panel
RCIC	Reactor Core Isolation Cooling
RHR	Residual Heat Removal
RRP	Reactor Recirculation Pump
SALP	Systematic Assessment of Licensee Performance
SDC	Shutdown Cooling
STA	Shift Technical Advisor
TS	Technical Specification

SIMULATION FACILITY REPORT

Facility Licensee: LaSalle Unit 1 and 2

Facility Licensee Dockets No: 50-373/375

Operating Tests Administered: October 22 - 24, 1997

This form is to be used only to report observations. These observations do not constitute audit or inspection findings and are not, without further verification and review, indicative of noncompliance with 10 CFR 55.45(b). These observations do not affect NRC certification or approval of the simulation facility other than to provide information that may be used in future evaluations. No licensee action is required in response to these observations.

While conducting the simulator portion of the operating tests, the following items were observed (if none, so state):

ITEM

DESCRIPTION

B RHR SDC flow adjustment from the RSP.

During performance of JPM, S-FX-08, Revision 3, "Shutdown of Suppression Pool Cooling. Startup B Residual Heat Removal in Shutdown Cooling," from the simulator RSP, RHR SDC flow became erratic while adjusting the flowrate using valve "-F053B."