



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

October 19, 2020

Mr. Charles Kharrl
Southern Nuclear Operating Co., Inc.
Joseph M. Farley Nuclear Plant
7388 North State Highway 95
Columbia, AL 36319-0470

SUBJECT: JOSEPH M. FARLEY NUCLEAR PLANT – NRC OPERATOR LICENSE
EXAMINATION REPORT 05000348/2020301 and 05000364/2020301

Dear Mr. Kharrl:

Due to the national pandemic emergency, administration of the operating test and written examination was delayed from the dates identified in the corporate notification letter (ML19219A218). The written examination was administered by your staff on July 31, 2020. During the period August 24 – 28, 2020, the Nuclear Regulatory Commission (NRC) administered operating tests to employees of your company who had applied for licenses to operate the Joseph M. Farley Nuclear Plant. At the conclusion of the tests, the examiners discussed preliminary findings related to the operating tests with those members of your staff identified in the enclosed report.

Seven Reactor Operator (RO) and six Senior Reactor Operator (SRO) applicants passed both the operating test and written examination. One RO retake applicant, who was granted an excusal from the operating test, passed the written examination. Two SRO applicants, whose applications were subsequently withdrawn before the operating test was administered, failed the written examination. There was one post-administration comment concerning the written examination and three post-administration comments concerning the operating test. These comments, and the NRC resolution of these comments, are summarized in Enclosure 2. A Simulator Fidelity Report is included in this report as Enclosure 3.

The operating test outlines and the written examination were developed by the NRC. All examination changes agreed upon between the NRC and your staff were made according to NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 11. The initial operating test, written RO examination, and written SRO examination met the quality guidelines contained in NUREG-1021.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm.adams.html> (the Public Electronic Reading Room).

If you have any questions concerning this letter, please contact me at (404) 997-4662

Sincerely,

/RA/

Eugene F. Guthrie, Chief
Operations Branch 2
Division of Reactor Safety

Docket Nos: 50-348 and 50-364
License Nos: NPF-2 and NPF-8

Enclosures:

1. Report Details
2. Facility Comments and NRC Resolution
3. Simulator Fidelity Report

cc: Distribution via Listserv

SUBJECT: JOSEPH M. FARLEY – NRC OPERATOR LICENSE EXAMINATION REPORT
05000348/2020301 and 05000364/2020301 dated October 19, 2020

DISTRIBUTION:

Bruno Caballero, RII

Eugene F. Guthrie, RII

* See previous page for concurrence

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ADAMS: Yes ACCESSION NUMBER: **ML20294A062** SUNSI REVIEW COMPLETE FORM 665 ATTACHED

OFFICE	RII:DRS/OB2	RII:DRS/OB2		
NAME	BCaballero	EGuthrie		
DATE	10/ 19 /2020	10/ 19 /2020		
E-MAIL COPY?	YES NO	YES NO		

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U.S. NUCLEAR REGULATORY COMMISSION

REGION II

Examination Report

Docket No.: 05000348, 05000364

License No.: NPF-2, NPF-9

Report No.: 05000348/2020301 and 05000364/2020301

Enterprise Identifier: L-2020-OLL-0026

Licensee: Southern Nuclear Company (SNC), LLC

Facility: Joseph M. Farley Nuclear Plant

Location: Columbia, AL

Dates: Written Examination – July 31, 2020
Operating Test – August 24 – 28, 2020

Examiners: Bruno Caballero, Chief Examiner, Senior Operations Engineer
Tom Morrissey, Senior Resident Inspector
Jacob Dolecki, Resident Inspector
Joseph Viera, Operations Engineer
Kevin Kirchbaum, Operations Engineer
Jason Bundy, Operations Engineer
Travis Iskierka-Boggs, Examiner-in-training

Approved by: Eugene F. Guthrie, Chief
Operations Branch 2
Division of Reactor Safety

SUMMARY

ER 05000348/2020301, 05000364/2020301; July 31, 2020 & August 24 – 28, 2020; Joseph M. Farley Nuclear Plant; Operator License Examinations.

Due to the national pandemic emergency, administration of the operating test and written examination was delayed from the dates identified in the corporate notification letter (ML19219A218).

Nuclear Regulatory Commission (NRC) examiners conducted an initial examination in accordance with the guidelines in Revision 11, of NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." This examination implemented the operator licensing requirements identified in 10 CFR §55.41, §55.43, and §55.45, as applicable.

The operating test outlines were developed by the NRC and the written examination was developed by the NRC. The initial operating test, written RO examination, and written SRO examination met the quality guidelines contained in NUREG-1021.

Members of the Joseph M. Farley Nuclear Plant training staff administered the written examination on July 31, 2020. The NRC administered the operating tests during the period August 24 – 28, 2020. Seven Reactor Operator (RO) and six Senior Reactor Operator (SRO) applicants passed both the operating test and written examination; one RO retake applicant, who was granted an excusal from the operating test, also passed the written examination. Fourteen applicants were issued licenses commensurate with the level of examination administered.

There were four post-examination comments.

No findings were identified.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA5 Operator Licensing Examinations

a. Inspection Scope

The NRC reviewed the licensee's examination security measures while preparing and administering the examinations in order to ensure compliance with 10 CFR §55.49, "Integrity of examinations and tests."

The NRC performed an audit of license applications before the preparatory site visit in order to confirm that they accurately reflected the subject applicants' qualifications in accordance with NUREG-1021.

Members of the Joseph M. Farley Nuclear Plant training staff administered the written examination on July 31, 2020. The NRC administered the operating tests during the period August 24 – 28, 2020. The NRC examiners evaluated seven Reactor Operator (RO) and six Senior Reactor Operator (SRO) applicants using the guidelines contained in NUREG-1021. Evaluations of applicants and reviews of associated documentation were performed to determine if the applicants, who applied for licenses to operate the Joseph M. Farley Nuclear Plant, met the requirements specified in 10 CFR Part 55, "Operators' Licenses."

The NRC evaluated the performance or fidelity of the simulation facility during the preparation and conduct of the operating tests.

b. Findings

No findings were identified.

The NRC developed the written examination sample plan outline, the operating test outlines, and the written examination. All examination material was developed in accordance with the guidelines contained in Revision 11, of NUREG-1021. Members of the Joseph M. Farley Nuclear Plant training staff reviewed the proposed examination. Examination changes agreed upon between the NRC and the licensee were made per NUREG-1021 and incorporated into the final version of the examination materials.

Seven RO applicants and six SRO applicants passed both the operating test and written examination. One RO retake applicant, who was granted an excusal from the operating test, passed the written examination. Two RO applicants, whose applications were subsequently withdrawn before the operating test was administered, failed the written examination. Eight RO applicants and six SRO applicants were issued licenses.

Several applicants demonstrated knowledge weaknesses during a job performance measure (JPM) to recover a dropped control rod in accordance with FNP-1-AOP-19.0, Malfunction of Rod Control System, Section 1.3, Dropped Rods in Mode 1. The JPM was designed such that once withdrawal of the dropped rod was initiated, a second control rod then dropped (i.e., alternate path portion of the JPM); the applicants were then expected to initiate a reactor trip. Applicant weaknesses during administration of

this JPM included failure to reset the rod group step counter, failure to perform a reactor trip, and failure to interpret plant indications associated with the second dropped rod.

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

The licensee submitted one post-examination comment concerning the written examination and three post-examination comments concerning the operating test. A copy of the final written examinations and answer keys, with all changes incorporated, may be accessed not earlier than September 26, 2022, in the ADAMS system (ADAMS Accession Number(s) ML20276A129 and ML20276A130). A copy of the licensee's post-examination comments may be accessed in the ADAMS system (ADAMS Accession Number ML20276A128).

4OA6 Meetings, Including Exit

Exit Meeting Summary

On August 28, 2020, the NRC examination team discussed generic issues associated with the operating test with Mr. Charles Kharri, Site Vice President, and members of the Joseph M. Farley Nuclear Plant staff. The examiners asked the licensee if any of the examination material was proprietary. No proprietary information was identified.

KEY POINTS OF CONTACT

Licensee personnel

Charles Kharri, Site Vice President
Delson Erb, Plant Manager
Rob Norris, Operations Director
Josh Carroll, Work Management Director
Ed Mullek, Maintenance Director
Keith Brown, Regulatory Affairs Manager
Gene Surber, Licensing Manager
Anderson Renaud, Operations Training Manager
Vince Richter, Operations Lead Instructor
Peppi Cooper, Training Support Manager
Tom Campbell, Licensing Engineer

NRC personnel

Pete Meier, NRC Resident Inspector

FACILITY AND APPLICANT POST-EXAMINATION COMMENTS AND NRC RESOLUTIONS

A complete text of the facility licensee and applicant post-examination comments can be found in ADAMS under Accession Number ML20276A128. There were four post-exam comments. One applicant provided a post-exam comment for SRO Written Exam Item #94; other applicants provided post-exam comments related to a scenario guide and two job performance measures (JPMs). The facility licensee agreed with all the applicants' contentions.

Post-Examination Comment #1: SRO Question #94

The applicant contended that there were two correct answers for the first part of the question because NMP-OS-007-001, Conduct of Operations Standards and Expectations, Section 4.28.5, Manual Operation of Motor-Operated Valves (MOVs) and Air-Operated Valves (AOVs), stated that a motor-operated valve (MOV), which was manually actuated using its handwheel operator, should be unseated and electrically stroked prior to declaring the valve operable, even though the same administrative procedure stated that the MOV may be considered operable when the MOV was manually actuated via the handwheel operator to its required safety position. The applicant contended that the stem of the question did not specify the availability of the MOV's electrical power supply, and the word "should" was a stronger administrative requirement than "may." Therefore, the applicant contended that the stem of the question did not contain any conditions that would preclude electrically stroking the MOV, which was a management expectation, even though the procedure allowed that the MOV to be considered operable as long as the MOV was electrically stroked later.

The facility licensee agreed with the applicant's contention and further contended that the past and current operational practice was to use the motor prior to returning a valve to remote service unless precluded by plant conditions.

Background

Question #94 was a two-part question:

94. Given the following conditions on Unit 1:

- A System Operator is going to remove two clearance tags on a safety related system.
 - Clearance Tag #1 is on a motor-operated valve (MOV): The System Operator has positioned the MOV to its required safety position (Open) using the MOV handwheel operator.
 - Clearance Tag #2 is on a manual drain valve: The System Operator desires to use a valve wrench to close the drain valve.

Which one of the following completes the statements below in accordance with NMP-OS-007-001, Conduct of Operations Standards and Expectations?

Clearance Tag #1: The MOV (1) OPERABLE.

Clearance Tag #2: An Operations Supervisor's permission (2) required to use the valve wrench to close the drain valve.

	<u>(1)</u>	<u>(2)</u>
A.	IS	IS
B.	is NOT	IS
C.	IS	is NOT
D.	is NOT	is NOT

The answer key indicated that Choice “A” was the correct answer. Neither the facility licensee nor any of the applicants contested the second portion of the test item. One of the eight SRO applicants who took the written exam picked Choice “A” as the original correct answer; four SRO applicants picked Choice “B”; one SRO applicant picked Choice “C”; and two SRO applicants picked Choice “D.” During the administration of the written exam, a different applicant asked the proctor whether power was removed from the MOV when the System Operator manually operated the MOV.

NRC Resolution: Applicant and facility comment accepted

The first part of the question tested Item “g” in NMP-OS-007-001, Conduct of Operations Standards and Expectations, Section 4.28.5, Manual Operation of Motor-Operated Valves (MOVs) and Air-Operated Valves (AOVs), which stated:

- g. An MOV, (including a Safety Related MOV) which has been manually actuated using the hand wheel operator:
- (1) Should normally be manually unseated and stroked using the motor operator prior to returning it to remote service and declaring it operable/functional unless an engineering evaluation is performed.
 - (2) May be considered operable/functional IF it is in its required safety position, but will require administrative tracking until electrically cycled.
 - (3) Must be declared inoperable until electrically cycled IF placed in a different position from that required for the safety function.
 - (4) (HNP) May be considered OPERABLE IF they are electrically backseated and meet the requirements of 51GM-MNT-034-0, MOV Electrical Backseating with Instantaneous Circuit Breaker Trip Protection OR other PRB approved work instructions.

The first part of the question asked if the MOV is / is NOT operable. In accordance with Item g (1), an MOV which was manually actuated using the hand wheel operator SHOULD [*emphasis added*] be stroked prior to declaring it operable, which implied a management expectation that was to be performed unless specific conditions precluded the action. The stem of the question did not specify the availability of the MOV power supply or whether an immediate discretionary decision was required; therefore, the stem of the question did not provide information to imply Item g (2) was necessary, i.e., the stem did not imply that an immediate discretionary decision by the SRO was required. Item g (2) stated that an MOV which was manually actuated using the handwheel operator MAY [*emphasis added*] be “considered” operable if the MOV was in its required safety position, but still required electrical cycling later.

NMP-AP-003, Procedure and Work Instruction Use and Adherence, Section 2.0, Definitions, stated:

- a. **Shall** – Denotes a requirement or mandatory activity.
- b. **Should** – Denotes a management expectation that is to be performed unless specific conditions preclude it.
- c. **May** – Denotes permission, neither a requirement or expectation.

The stem of the question did NOT ask whether NMP-OS-007-001 **allowed** [*emphasis added*] the MOV to be **considered** [*emphasis added*] operable, and the stem did not include any information that implied an immediate discretionary operability decision was required; therefore, the applicants were forced to make an assumption whether electrically stroking the valve was possible. Based on an operationally valid assumption, there were two possible answers.

- IF an applicant assumed that the power supply was available, THEN the applicant could select Choice “B” (not operable) because the management expectation was to use the motor prior to returning a valve to remote service.
- IF an applicant assumed that the power supply was NOT available AND further assumed that an immediate discretionary operability decision was required,

- THEN the applicant could select Choice “A” (operable) because there was no known issue with the valve in its required safety position.

NUREG-1021, ES-403, Grading Initial Site-Specific Written Examinations, Section D.1.a stated, in part:

The following types of errors, if identified and adequately justified by the facility licensee or an applicant, are most likely to result in post-examination changes agreeable to the NRC:

- *a question with an unclear stem that confused the applicants or did not provide all the necessary information.*

ES-403, Section D.1.c stated, in part,

If a question is determined to have two correct answers, both answers will be accepted as correct.

Therefore, the answer key was changed to accept both Choice “A” and “B” as correct.

Post-Examination Comment #2: Simulator Scenario 1, Event 5

One applicant contended that Form ES-D-2, Required Operator Actions, for Scenario 1 Event 5 did not align with Revision 23.0 of AOP-100, Section 1.4, Step 3. The applicant contended that the Form ES-D-2 should be changed to say, “*IF desired to stabilize the plant and a ramp is in progress, place turbine on HOLD.*” The facility licensee concurred with the applicants’ contention.

Background

Scenario 1, Event 5 was 1A Steam Generator Feed Pump (SGFP) Controller failure. The operating test Form ES-D-2 for Scenario 1 included the following Step 3 from 1-AOP-100, Instrument Malfunction, Section 1.4, SGFP Speed Control:

<p>3 <u>IF</u> a ramp is in progress, place turbine on HOLD.</p>
--

However, version 23.0 of 1-AOP-100, Section 1.4, included the following Step 3:

— **3 IF desired to stabilize the plant and a
ramp is in progress,
place turbine on HOLD.**

NRC Resolution: Applicant and facility comment accepted

Version 23.0 of 1-AOP-100 was issued on February 12, 2020; the facility licensee froze the initial exam procedures on February 28, 2020 following their internal validation of the operating test. However, the new version 23.0 was not incorporated into the ES-D-2 for the scenario.

Therefore, evaluation of the applicants' performance during Scenario 1, Event 5 was completed in accordance with ES-303, Documenting and Grading Initial Operating Tests, using the corrected marked-up version of Form ES-D-2 for Scenario 1 Event 5 that reflected Revision 23.0 of AOP-100, Section 1.4, Step 3. In accordance with NUREG-1021, Rev. 11, ES-501, Section F.1, the marked-up version of Form ES-D-2 will be added to ADAMS.

Post-Examination Comment #3: JPM "D", Place Letdown in service after Spurious SI

One applicant contended that the task standard for JPM Step 6 did not align with ESP-1.1, SI Termination, Step 14.1.4. Specifically, the applicant contended that the phrase "Open letdown orifice isolation valve(s)" should be added to the standard. The applicant contended that Step 14.1.4 allowed any one orifice isolation valve to be opened since the word "valve(s)" meant that the singular form of only opening any one orifice isolation "valve" was permitted.

The facility licensee agreed with the applicant's contention and further contended that the intent of Step 14.1.4, according to the ESP-1.1 basis document, was to establish a controlled bleed path from the RCS to allow lowering and controlling pressurizer level. The facility licensee contended that ANY one of the letdown orifices provided adequate flow to reestablish a RCS bleed path, with charging and seal injection in service, to lower and control pressurizer level. The facility licensee contended that the intent of the "AND" / "OR" connectors in Step 14.1.4 was to preclude two 60 gpm orifices from being placed in service because 120 gpm could exceed the allowed flow through the CVCS demineralizers. The facility licensee stated that a procedure change request was subsequently initiated via the corrective action program to enhance Step 14.1.4.

Background

The initial conditions for JPM "D" were:

- a. Plant has experienced a spurious safety injection.
- b. ESP-1.1 is in progress and has been completed through Step 13.1.
- c. Pressurizer level is ~ 44% and slowly rising.
- d. CCW is aligned to the miscellaneous header.
- e. A pre-job brief is not required.

Your task is to perform Step 14 of ESP-1.1 and establish letdown flow

JPM Step 6 (Procedure Step 14.1.4) and its performance standard was:

- | | |
|--|--|
| <p>*6. Step 14.1.4
 Open letdown orifice isolation valve(s).
 LTDN ORIF ISO
 45 GPM
 Q1E21HV8149A
 AND
 <input type="checkbox"/> LTDN ORIF ISO 60 GPM
 Q1E21HV8149B
 OR
 <input type="checkbox"/> Q1E21HV8149C</p> | <p>Handswitch for HV-8149A and HV-8149B or C taken to open.
 Observes: For each valve operated red light lit and green light out, letdown flow increases.</p> |
|--|--|

ESP-1.1, Step 14.1.4 Action/Expected Response (A/ER) and Response NOT Obtained (RNO) columns were:

- | | |
|---|---|
| <p>14.1.4 Open letdown orifice isolation valve(s).

 LTDN ORIF ISO
 45 GPM
 <input type="checkbox"/> Q1E21HV8149A

 <u>AND</u>

 LTDN ORIF ISO
 60 GPM
 <input type="checkbox"/> Q1E21HV8149B
 <u>OR</u>
 <input type="checkbox"/> Q1E21HV8149C</p> | <p>d) Establish excess letdown flow.

 EXC LTDN
 HX DISCH
 <input type="checkbox"/> HIK 137 adjusted</p> <p>e) Maintain excess letdown heat exchanger outlet temperature less than 165°F.

 EXC LTDN HX
 OUTLET TEMP
 <input type="checkbox"/> TI 139</p> |
|---|---|

NRC Resolution: Applicant and Facility Comment NOT accepted

In Step 14.1.4, the word “valve(s)” allowed two options to be performed.

Option 1: Plural “valves”: Open the 45 gpm (8149A) AND the 60 gpm (8149B) orifice isolation valves (plural) to achieve 105 gpm.

OR

Option 2: Singular “valve”: Open ONLY the 60 gpm (8149C) orifice isolation valve (singular) to achieve 60 gpm.

Step 14.1.4 did not allow ONLY the 45 gpm (8149A) orifice to be opened because of the “AND” connection to the 60 gpm (8149B) orifice, and also did not allow both 60 gpm orifice isolation valves (8149B and 8149C) to be opened.

The basis for establishing letdown, in accordance with FNP-0-ESB-1.1, Specific Background Document for 1/2 ESP-1.1 SI Termination, was to establish a controlled bleed path from the RCS, and stated, in part:

“Normal letdown provided a controlled mechanism for offsetting volume additions through the charging system.If normal letdown cannot be established, excess letdown is established to balance seal injection flow. Charging may have to be reduced after excess letdown is established due to the limited capacity of excess letdown.”

The applicant and facility licensee contended that opening any ONE of the letdown orifices met the intent of Step 14.1.4 because sufficient RCS bleed path flow would be established such that charging and seal injection flow would be maintained. The JPM initial conditions stated that pressurizer level was 44% and rising. The letdown flow with only the 8149A (45 gpm) orifice was ~ 49 gpm; the total seal injection flow was ~ 24 gpm (8 gpm per pump); and the #1 Seal Leakoff flow was ~ 7.5 gpm (2.5 gpm per pump).

Although the 8149A (45 gpm) orifice **could** [*emphasis added*] potentially meet the **intent** [*emphasis added*] of Step 14.1.4 with additional charging flow adjustments, Step 14.1.4 did not allow only the 8149A (45 gpm) orifice to be placed in service.

NUREG-1021, Appendix C, Job Performance Measure Guidelines, Section B.3 stated, in part,:

Every procedural step that the examinee must perform correctly (i.e., accurately, in the proper sequence, and at the proper time) to accomplish the task standard shall be identified as a critical step and shall have an associated performance standard.

Therefore, the task standard for JPM Step 6 was retained because procedure Step 14.1.4 did not allow only the 8149A (45 gpm) orifice to be placed in service.

Post-Examination Comment #4: SRO Admin JPM, Determine LHRA Access Controls and Evaluate Administrative Dose Limit Requirements

Two applicants contended that the task standard for JPM Step 2 should be revised to also permit the use of a flashing light and barrier as a compensatory action to preclude unauthorized individuals' access into the locked high radiation area (LHRA); the applicants contended that the task standard for JPM Step 2 only allowed an access control guard even though the flashing light and barrier was permitted.

The facility licensee agreed with the applicants and contended that NMP-HP-302, Restricted Area Classification, Postings, and Access Control, allowed the use of a flashing red light and barrier, in lieu of an access control guard, and has been utilized by the facility licensee in the past, although not on a routine basis.

Background

The administrative JPM involved entering the Letdown Heat Exchanger Room when it was posted as a LHRA and one element of the JPM was for the applicants to identify the required compensatory action(s) to ensure only authorized individuals gained access into the LHRA while a system operator entered the room to manually close a valve. The initial conditions of the JPM specified that the Letdown Heat Exchanger Room did not have a way to be re-locked while the system operator was performing the work in the room.

JPM Step 2 and its performance standard was:

*2. Determines compensatory action(s) to ensure only authorized individuals gain access into the LHRA while work is being performed

Determines that an access control guard is required while the SO is in the area

NMP-HP-302, defined the following boundary requirements for LHRAs:

Hazard	Boundary Requirements	Posting
<p>LOCKED HIGH RADIATION AREA</p> <p>≥ 800 mR/h @30 cm <500 Rads @ 1 meter from any source or surface</p>	<p>access may be used.</p> <ul style="list-style-type: none"> • A locked barricade is required for the boundary except while the area is being accessed. • Refer to Attachment 1 and Attachment 2 for posting and down-posting areas. • At Farley and Vogtle only, a flashing light and barrier may be used in lieu of a locked barricade with approval by the RPM, or designee. • Refer to Attachment 3 for a sample checklist typically used to set up flashing lights. • Use Attachment 1 for routine inspection to verify the integrity of boundaries. • An Access Control Guard may be used while an area is being routinely accessed or additional time is required to establish controlled boundaries. Refer to Attachment 4 for a sample checklist typically used to brief Access Control Guards. • Ensure posting and locked access of areas that require the removal of bolts and/or the use of lifting equipment • See Section 4.2.6 Step 1 for additional requirements 	<p>LHRA sign with the following;</p> <ul style="list-style-type: none"> • RP BRIEF REQUIRED FOR ENTRY • For bolted or plug/blockout access, an LHRA sign is not required but the access <u>MUST</u> be labeled with a warning and; • CONTACT RP PRIOR TO OPENING

The standard for JPM Step 2 (access control guard) was based on the 6th bullet, i.e., an Access Control Guard may be used while an area is being routinely accessed or additional time is required to establish controlled boundaries. Attachment 4, LHRA Access Guard Responsibilities Checklist, provided requirements for an individual performing the function of an Access Guard to a LHRA.

Precaution and Limitation 24 stated:

24. The use of flashing lights with Locked High Radiation Area postings should only be used with the approval of the RP Manager.

The standard for JPM Step 2 did not include all the options available for compensatory actions that precluded unauthorized individuals from entering the Letdown Heat Exchanger Room while the work was being performed, i.e., the standard for JPM Step 2 only identified one option, which was the access control guard, even though NMP-HP-302 also allowed a flashing light and barrier with RP Manager approval.

NUREG-1021, Appendix C, Job Performance Measure Guidelines, Section B.3 stated, in part,:

Every procedural step that the examinee must perform correctly (i.e., accurately, in the proper sequence, and at the proper time) to accomplish the task standard shall be identified as a critical step and shall have an associated performance standard.

Therefore, the performance standard for JPM Step 2 was revised to include both options, i.e., an access control guard or a flashing light and barrier with RP Manager approval. In accordance with NUREG-1021, Rev. 11, ES-501, Section F.1, the marked-up version of this SRO administrative JPM will be added to ADAMS.

SIMULATOR FIDELITY REPORT

Facility Licensee: Joseph M. Farley Nuclear Plant

Facility Docket No.: 05000348, 05000364

Operating Test Administered: August 24 – 28, 2020

This form is to be used only to report observations. These observations do not constitute audit or inspection findings and, without further verification and review in accordance with Inspection Procedure 71111.11 are not indicative of noncompliance with 10 CFR 55.46. No licensee action is required in response to these observations.

For the simulator portion of the operating test, examiners observed the following:

<u>Item</u>	<u>Description</u>
1.	R-70B, N16 Primary-to-Secondary Leak Rad Monitor (Mirion R70) did not allow changing the setpoint at the Remote Display. Simulator Maintenance DR # 0025004
2.	Simulator "A" main computer was required to be re-booted and its initial conditions (IC) reset function did not occur, potentially due to compatibility issues with the exam room desktop simulator and/or Simulator "B". Simulator Maintenance DR# 0024985, # 0024904, and #0025003