

Exelon Nuclear

Job Performance Measure

Remove fuses for a stuck open SRV per LOA-SRV-1(2)01

JPM Number: P-NB-01

Revision Number: 12

Date: 7 / 21 / 2020

Developed By: _____
Instructor Date

Validated By: _____
SME or Instructor Date

Reviewed By: _____
Operations Representative Date

Approved By: _____
Training Department Date

JOB PERFORMANCE MEASURE VALIDATION CHECKLIST

NOTE: All steps of this checklist should be performed upon initial validation.
 Prior to JPM usage, revalidate JPM using steps 9 and 13 below.

- _____ 1. Task description and number, JPM description and number are identified.
- _____ 2. Knowledge and Abilities (K/A) references are included.
- _____ 3. Performance location specified. (in-plant, control room, simulator, or other)
- _____ 4. Initial setup conditions are identified.
- _____ 5. Initiating cue (and terminating cue if required) are properly identified.
- _____ 6. Task standards identified and verified by SME review.
- _____ 7. Critical steps meet the criteria for critical steps and are identified with an asterisk (*).
- _____ 8. If an alternate path is used, the task standard contains criteria for successful completion.
- _____ 9. Verify the procedure(s) referenced by this JPM reflects the current revision:
 Procedure _____ Rev: _____
 Procedure _____ Rev: _____
 Procedure _____ Rev: _____
- _____ 10. Verify cues both verbal and visual are free of conflict.
- _____ 11. Verify performance time is accurate
- _____ 12. If the JPM cannot be performed as written with proper responses, then revise the JPM.
- _____ 13. When JPM is initially validated, sign and date JPM cover page. Subsequent validations, sign and date below:

SME / Instructor	Date
SME / Instructor	Date
SME / Instructor	Date

Revision Record (Summary)

- Revision 08,** 08/24/98 Reformatted, revised to new procedure LOA-SRV-101
- Revision 09,** 10/10/05 Changed from F to K SRV. Made the JPM so it could be performed on either Unit. Updated task to Operations task list number.
- Revision 10,** 09/15/09 Revised for procedure and JPM template changes.
- Revision 11,** 10/02/12 Added new checklist. Changed cue to state where in LOA-SRV-1(2)01 to start.
- Revision 12,** 07/21/20 Updated for the ILT 19-1 NRC Exam.

SETUP INSTRUCTIONS

1. Have a copy of LOA-SRV-101(201).

INITIAL CONDITIONS

You are an extra NSO,

- Unit __ is operating at 80% power.
- The Control Room has just received positive indication that the "K" SRV (__ B21-F013K) has spuriously opened.
- You have a plant radio.

INITIATING CUE

The Unit __ NSO has just called you on the radio and requested that you remove the "K" SRV control fuses in accordance with LOA-SRV- 01, STUCK OPEN SAFETY RELIEF VALVE, beginning at Step 10. Notify the Unit __ NSO when fuses are pulled.

Fill in the JPM Start Time when the student acknowledges the Initiating Cue.

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Information For Evaluator's Use:

UNSAT requires written comments on respective step.

- * Denotes critical steps.

Number any comments in the "Comment Number" column on the following pages. Then annotate that comment in the "Comments" section. The comment section should be used to document: the reason that a step is marked as unsatisfactory, marginal performance relating to management expectations, or problems the examinee had while performing the JPM. Comments relating to procedural or equipment issues should be entered and tracked using the site's appropriate tracking system.

Some operations that are performed from outside of the control room may require multiple steps. These items may be listed as individual steps in this JPM. It is acceptable for the candidate to direct the local operator to perform groups of procedure steps instead of calling for each individual item to be performed.

The timeclock starts when the candidate acknowledges the initiating cue.

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JPM Start Time: _____

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	SAT	UNSAT	Comment Number
NOTE: After the Examinee demonstrates where to obtain a copy of the procedure provide them with a copy of LOA-SRV-101(201).					
1	OBTAIN a copy of LOA-SRV-101(201).	Examinee demonstrates where to OBTAIN a copy of LOA-SRV-101(201).	—	—	—
NOTE: Examinee may identify the need for obtaining fuse pullers ahead of time (they are normally located in the SRV cabinets). If fuse pullers are not present in the SRV cabinet, ask examinee "Where can you get a set of fuse pullers?" If they reply any of the following, tell them that they now have a set of fuse pullers. (Do not add any time, the JPM time is validated assuming the fuse pullers are in the SRV cabinet). <p style="text-align: center;">-EO storage locker (Swgr rooms) -LGA Locker. -From another SRV fuse cabinet.</p>					
NOTE: Panel 1(2)H13-P628 & 1(2)H13-P645 are located in the Division 1 AEER. The order that the Panels are done is not important.					
NOTE: The following steps are performed at the 1(2)H13-P628 panel in the AEER.					
2	REFER to Table 1 to IDENTIFY fuses associated with stuck open SRV.	Examinee refers to Table 1 to identify fuses F43 and F44 for K SRV	—	—	—
*3	Remove fuse F43 (TB FF, fuse 9).	Examinee removes fuse F43 (TB FF, fuse 9).			
CUE	The component you identified is in the condition you described.				
*4	Remove fuse F44 (TB FF, fuse 10).	Examinee removes fuse F44 (TB FF, fuse 10).	—	—	—
CUE	The component you identified is in the condition you described.				
NOTE: The following steps are performed at the 1(2)H13-P645 panel in the AEER.					
5	REFER to Table 1 to IDENTIFY fuses associated with stuck open SRV.	Examinee refers to Table 1 to identify fuses F63B and F64B for K SRV	—	—	—

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	<u>SAT</u>	<u>UNSAT</u>	<u>Comment Number</u>
*6	Remove fuse F63B (TB DD, 11 from right).	Examinee removes fuse F63B (TB DD, 11 from right).	—	—	—
CUE	The component you identified is in the condition you described.				
*7	Remove fuse F64B (TB DD, 12 from right.)	Examinee removes fuse F64B (TB DD, 12 from right.)	—	—	—
CUE	The component you identified is in the condition you described.				
8	Examinee reports to Unit 1(2) NSO that the fuses for 1(2)B21-F013K have been removed.	Examinee reports that the fuses for 1(2)B21-F013K have been removed.	—	—	—
CUE	As Unit 1(2) NSO, acknowledge report. JPM is complete.				

JPM Stop Time: _____

JPM SUMMARY

Operator's Name: _____ **Emp. ID#:** _____

Job Title: EO RO SRO FS STA/IA SRO Cert

JPM Title: Remove fuses for a stuck open SRV per LOA-SRV-1(2)01

JPM Number: P-NB-01 Revision Number: 12

Task Number and Title: Remove fuses for a stuck open SRV

70.005 Provided initial conditions, perform actions for a Stuck Open SRV IAW station procedures.

K/A Number and Importance: 239002 A2.03 (4.1/4.2) Ability to (a) predict the impacts of the following on the RELIEF/SAFETY VALVES; and (b) based on those predictions, use procedures to correct, control, or mitigate the consequences of those abnormal conditions or operations: Stuck open SRV

Suggested Testing Environment: Plant

Alternate Path: Yes No SRO Only: Yes No Time Critical: Yes No

Reference(s): LOA-SRV-101(201), Unit 1(2) Stuck Open Safety Relief Valve, Rev. 9(8)

Actual Testing Environment: Simulator Control Room In-Plant Other

Testing Method: Simulate Perform

Estimated Time to Complete: 16 minutes **Actual Time Used:** _____ minutes

EVALUATION SUMMARY:

Were all the Critical Elements performed satisfactorily? Yes No

The operator's performance was evaluated against standards contained within this JPM and has been determined to be: Satisfactory Unsatisfactory

Comments: _____

Evaluator's Name: _____ (Print)

Evaluator's Signature: _____ **Date:** _____

INITIAL CONDITIONS

You are an extra NSO,

- Unit ___ is operating at 80% power.
- The Control Room has just received positive indication that the "K" SRV (___ B21-F013K) has spuriously opened.
- You have a plant radio.

INITIATING CUE

The Unit ___ NSO has just called you on the radio and requested that you remove the "K" SRV control fuses in accordance with LOA-SRV- 01, STUCK OPEN SAFETY RELIEF VALVE, beginning at Step 10. Notify the Unit ___ NSO when fuses are pulled.

Exelon Nuclear

Job Performance Measure

Perform LGA-RI-101 Attachment 'A'

JPM Number: P-RI-02

Revision Number: 13

Date: 7 / 19 / 2020

Developed By: _____
Instructor Date

Validated By: _____
SME or Instructor Date

Reviewed By: _____
Operations Representative Date

Approved By: _____
Training Department Date

JOB PERFORMANCE MEASURE VALIDATION CHECKLIST

NOTE: All steps of this checklist should be performed upon initial validation.
 Prior to JPM usage, revalidate JPM using steps 9 and 13 below.

- _____ 1. Task description and number, JPM description and number are identified.
- _____ 2. Knowledge and Abilities (K/A) references are included.
- _____ 3. Performance location specified. (in-plant, control room, simulator, or other)
- _____ 4. Initial setup conditions are identified.
- _____ 5. Initiating cue (and terminating cue if required) are properly identified.
- _____ 6. Task standards identified and verified by SME review.
- _____ 7. Critical steps meet the criteria for critical steps and are identified with an asterisk (*).
- _____ 8. If an alternate path is used, the task standard contains criteria for successful completion.
- _____ 9. Verify the procedure(s) referenced by this JPM reflects the current revision:
 Procedure LGA-RI-01 Rev: 8
 Procedure _____ Rev: _____
 Procedure _____ Rev: _____
- _____ 10. Verify cues both verbal and visual are free of conflict.
- _____ 11. Verify performance time is accurate
- _____ 12. If the JPM cannot be performed as written with proper responses, then revise the JPM.
- _____ 13. When JPM is initially validated, sign and date JPM cover page. Subsequent validations, sign and date below:

SME / Instructor	Date
SME / Instructor	Date
SME / Instructor	Date

Revision Record (Summary)

- Revision 06,** Revised K/A numbers to reflect NUREG 1021 Rev 8. Revised format to meet NTAFT JLOR03 Rev 1. Made specific to Unit 2
- Revision 07,** Changed sequence not required from steps 4 thru 11 to steps 4 thru 15.
- Revision 08,** Revised to new task number and title. Revised IAW NTAFT JLOR 03 Rev. 02.
- Revision 09,** Revised per revision 7 LGA-RI-01 and revised approximate completion time for year 2000 JPM data.
- Revision 10,** Changed LGA-RI-01 to LGA-RI-201 and Attachment 2A to Attachment A. Added initiating cue to the examinee's initial conditions page.
- Revision 11,** Updated procedure revision.
- Revision 12,** Revised for formatting, procedure revisions, used latest JPM template, made JPM to be used on Unit 1.
- Revision 13,** Updated for the ILT 19-1 NRC Exam.

Materials

1. Copy of LGA-RI-101 Attachment 'A'

INITIAL CONDITIONS

You are an extra NSO,

- Unit 1 has SCRAMMED.
- All rods are full in.
- RCIC is currently the only injection source available.
- RPV pressure is dropping due to a small leak.
- RPV Level is at 80" and dropping at 1" per minute.
- Radiation conditions in the plant are at or below normal levels
- You have a plant radio.

INITIATING CUE

The Unit 1 Supervisor has directed you to defeat the RCIC isolations per LGA-RI-101, Unit 1 RPV Injection Using RCIC Including Defeat of RCIC Isolations, Attachment 'A'. Notify the Unit 1 Supervisor when Attachment 'A' is complete.

Fill in the JPM Start Time when the student acknowledges the Initiating Cue.

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Information For Evaluator's Use:

UNSAT requires written comments on respective step.

* Denotes critical steps.

Number any comments in the "Comment Number" column on the following pages. Then annotate that comment in the "Comments" section. The comment section should be used to document: the reason that a step is marked as unsatisfactory, marginal performance relating to management expectations, or problems the examinee had while performing the JPM. Comments relating to procedural or equipment issues should be entered and tracked using the site's appropriate tracking system.

Some operations that are performed from outside of the control room may require multiple steps. These items may be listed as individual steps in this JPM. It is acceptable for the candidate to direct the local operator to perform groups of procedure steps instead of calling for each individual item to be performed.

The timeclock starts when the candidate acknowledges the initiating cue.

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JPM Start Time: _____

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	<u>SAT</u>	<u>UNSAT</u>	<u>Comment Number</u>
NOTE: After the Examinee demonstrates where to obtain a copy of the procedure provide the Examinee with a copy of LGA-RI-101.					
1	Obtain a copy of the procedure.	Examinee demonstrates where to obtain a copy of the procedure.	—	—	—
NOTE: The LA key is required access the LGA equipment locker on Unit 2 AB 731'. The Examinee may either obtain a key from the Control Room, Shift Managers Office or may use their own keys.					
2	Obtain Unit 1 LGA-RI-101 equipment bag from Main LGA Support Locker.	Examinee obtains Unit 1 LGA-RI-101, bag from Main LGA Support Locker (Outside U2 AEER 731' AB).	—	—	—
CUE	You have obtained the equipment you identified.				
NOTE: Sequence of lifted leads is not required and may be performed in any order.					
*3	At panel 1H13-P621, LIFT lead from Terminal Block CC, Point 28, to defeat the RCIC low RPV pressure isolation signal.	At panel 1H13-P621, Examinee LIFTS lead from Terminal Block CC, Point 28, to defeat the RCIC low RPV pressure isolation signal.	—	—	—
CUE	The component you identified is in the condition you described.				
4	Sign and enter date and time on LGA-RI-101, Attachment A.	Examinee signs and enters date and time on LGA-RI-101, Attachment A.	—	—	—
*5	At panel 1H13-P621, LIFT lead from Terminal Block CC, Point 43, to defeat the RCIC high water level closure signal to 1E51-F045.	At panel 1H13-P621, Examinee LIFTS lead from Terminal Block CC, Point 43, to defeat the RCIC high water level closure signal to 1E51-F045.	—	—	—
CUE	The component you identified is in the condition you described.				

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	<u>SAT</u>	<u>UNSAT</u>	<u>Comment Number</u>
6	Sign and enter date and time on LGA-RI-101, Attachment A.	Examinee signs and enters date and time on LGA-RI-101, Attachment A.	—	—	—
*7	At panel 1H13-P621, LIFT lead from Terminal Block CC, Point 75, to defeat the RCIC low RPV pressure isolation signal.	At panel 1H13-P621, Examinee LIFTS lead from Terminal Block CC, Point 75, to defeat the RCIC low RPV pressure isolation signal.	—	—	—
CUE	The component you identified is in the condition you described.				
8	Sign and enter date and time on LGA-RI-101, Attachment A.	Examinee signs and enters date and time on LGA-RI-101, Attachment A.	—	—	—
*9	At panel 1H13-P618, LIFT lead from Terminal Block, AA Point 8, to defeat the RCIC low RPV pressure isolation signal.	At panel 1H13-P618, Examinee LIFTS lead from Terminal Block, AA Point 8, to defeat the RCIC low RPV pressure isolation signal.	—	—	—
CUE	The component you identified is in the condition you described.				
10	Sign and enter date and time on LGA-RI-101, Attachment A.	Examinee signs and enters date and time on LGA-RI-101, Attachment A.	—	—	—
*11	At panel 1H13-P618, LIFT lead from Terminal Block, AA Point 18, to defeat the RCIC low RPV pressure isolation signal.	At panel 1H13-P618, Examinee LIFTS lead from Terminal Block, AA Point 18, to defeat the RCIC low RPV pressure isolation signal.	—	—	—
CUE	The component you identified is in the condition you described.				
12	Sign and enter date and time on LGA-RI-101, Attachment A.	Examinee signs and enters date and time on LGA-RI-101, Attachment A.	—	—	—
13	Notify Unit Supervisor that LGA-RI-101, Attachment A is complete.	Examinee notifies Unit Supervisor that LGA-RI-101, Attachment A is complete	—	—	—

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	SAT	UNSAT	Comment Number
CUE	As Unit Supervisor, acknowledge report. JPM is complete.				

JPM Stop Time: _____
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JPM SUMMARY

Operator's Name: _____ **Emp. ID#:** _____

Job Title: EO RO SRO FS STA/IA SRO Cert

JPM Title: Perform LGA-RI-101 Attachment 'A'

JPM Number: P-RI-02 Revision Number: 13

Task Number and Title: Defeat RCIC isolations

401.000 Given an LGA in progress, evaluate plant conditions, locate and perform the following procedures including installation/removal of a jumper/lead/relay boot, IAW station procedures.

K. LGA-RI-01

K/A Number and Importance: 295031 EA1.05 (4.3/4.3) Ability to operate and/or monitor the following as they apply to REACTOR LOW WATER LEVEL: Reactor core isolation system: Plant-Specific

Suggested Testing Environment: Plant

Alternate Path: Yes No SRO Only: Yes No Time Critical: Yes No

Reference(s): LGA-RI-101, Unit 1, RPV Injection Using RCIC Including Defeat of RCIC Isolations, Rev. 8

Actual Testing Environment: Simulator Control Room In-Plant Other

Testing Method: Simulate Perform

Estimated Time to Complete: 15 minutes

Actual Time Used: _____ minutes

EVALUATION SUMMARY:

Were all the Critical Elements performed satisfactorily? Yes No

The operator's performance was evaluated against standards contained within this JPM and has been determined to be: Satisfactory Unsatisfactory

Comments: _____

Evaluator's Name: _____ (Print)

Evaluator's Signature: _____ **Date:** _____

INITIAL CONDITIONS

You are an extra NSO,

- Unit 1 has SCRAMMED.
- All rods are full in.
- RCIC is currently the only injection source available.
- RPV pressure is dropping due to a small leak.
- RPV Level is at 80" and dropping at 1" per minute.
- Radiation conditions in the plant are at or below normal levels
- You have a plant radio.

INITIATING CUE

The Unit 1 Supervisor has directed you to defeat the RCIC isolations per LGA-RI-101, Unit 1 RPV Injection Using RCIC Including Defeat of RCIC Isolations, Attachment 'A'. Notify the Unit 1 Supervisor when Attachment 'A' is complete.

JOB PERFORMANCE MEASURE

Place Unit 2 Service Water in Service and Respond to TCV Failure
Alternate Path

JPM: NRC-LAS-2020-k

November 2020

Facility: LaSalle

K/A Reference: 400000 K6.01 (2.7/2.8), Knowledge of the effect that a loss or malfunction of the following will have on the CCWS: Valves

INITIAL CONDITIONS

1. You are an extra NSO
2. Unit 2 is in Mode 2 following a refueling outage
3. Unit 2 is placing Service Water in service IAW LOP-WS-01, "Service Water System Startup" and the previous shift has completed through Step E.13.
4. The previous shift started Service Water Jockey Pump 0WS02PA.

INITIATING CUE

Place Service Water in service on Unit 2 IAW LOP-WS-01, "Service Water System Startup" starting with Step E.14.

Provide examinee with: A copy of LOP-WS-01, pages 1 through 6. When the Control Room reports low service water pressure, provide examinee with a copy of LOA-WS-201 Section B.1.

Fill in the JPM Start Time when the examinee acknowledges the Initiating Cue.

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Information For Evaluator's Use:

UNSAT requires written comments on respective step.

* Denotes critical steps.

Number any comments in the "Comment Number" column on the following pages. Then annotate that comment in the "Comments" section. The comment section should be used to document: the reason that a step is marked as unsatisfactory, marginal performance relating to management expectations, or problems the Candidate had while performing the JPM. Comments relating to procedural or equipment issues should be entered and tracked using the site's appropriate tracking system.

Some operations that are performed from outside of the control room may require multiple steps. These items may be listed as individual steps in this JPM. It is acceptable for the candidate to direct the local operator to perform groups of procedure steps instead of calling for each individual item to be performed.

The timeclock starts when the candidate acknowledges the initiating cue.

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JPM Start Time: _____

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	SAT	UNSAT	Comment Number
*1.1	At Remote Shutdown Panel 2C61-P001, PLACE the control switch for Service Water Jockey Pump 0WS02PA to the AFTER START position	Simulates placing switch for Service Water Jockey Pump 0WS02PA to the AFTER START position	—	—	—
Cue	The component you identified is in the condition you described				
2.1	If required, START CO2 Injection System	Acknowledges another operator will perform this step and continues with procedure	—	—	—
Cue	Inform applicant another operator will start the CO2 Injection System				
ALTERNATE PATH STARTS HERE					
Cue	As Unit 2, inform the applicant the Low Service Water Pressure alarm has sounded and system pressure is 78 psig and slowly lowering. Direct the applicant to take actions in LOA-WS-201 Section B.2. Provide applicant with a copy of LOA-WS-201 after they say where to obtain a copy of the procedure				
3.1	CHECK TBCCW service water FCV 2WS029 – Controlling at setpoint (80 to 95 deg F)	Checks temperature at TBCCW Heat Exchanger and observes temperature is 90 deg F	—	—	—
Cue	Indicate temperature on meter is approximately 90 deg F at TBCCW Heat Exchanger				
4.1	CHECK Turbine Oil Cooler service water FCV 2WS035 – Controlling at setpoint (110 to 120 deg F) Recognize Turbine Oil Cooler FCV has failed	Checks temperature at TLO reservoir and observes temperature is 75 deg F Proceeds to Step 3.1 for Response Not Obtained	—	—	—
Cue	Indicate temperature on meter is approximately 75 deg F at TLO reservoir If asked, inform the applicant the turbine is NOT on the turning gear				

<u>STEP</u>	<u>ELEMENT</u>	<u>STANDARD</u>	SAT	UNSAT	Comment Number
*4.2	OPEN 2WS102, U-2 Service Water from Turb Oil Cooler FCV 10" Bypass Stop	Simulates turning valve handwheel for 2WS102 counter-clockwise until valve stem is fully out	—	—	—
Cue	The component you identified is in the condition you described				
*4.3	CLOSE 2WS034, U-2 Service Water from Turb Oil Coolers FCV Upstream Stop	Simulates turning valve handwheel for 2WS034 clockwise until valve stem is fully in	—	—	—
Cue	The component you identified is in the condition you described				
Cue	Another Operator is standing by temperature meter with a radio				
*4.4	THROTTLE 2WS102 to maintain Turbine Oil Temperature between 110 and 120 deg F	Simulates turning the valve handwheel for 2WS102 clockwise while observing temperature	—	—	—
Cue	As the applicant throttles 2WS102 closed, report that temperature is rising. When valve is throttled three turns, report temperature has stopped rising and is stable at 115 deg F				
TERMINATING CUE:					
As Unit 2, inform the applicant the low service water pressure alarm has cleared. This concludes the JPM					

JPM Stop Time: _____

JPM SUMMARY

Operator's Name: _____

Job Title: EO RO SRO FS STA/IA SRO Cert

JPM Title: Place Unit 2 Service Water in service and respond to TCV failure

JPM Number: NEW **Revision Number:** 00

Task Number and Title: Given the proper procedure, perform actions and respond to alarm conditions

Task Standard: Perform LOP-WS-01, "Service Water System Startup" and respond to low service water pressure IAW LOA-WS-201, "Loss of Service Water."

K/A Number and Importance: 400000 K6.01 (2.7/2.8), Knowledge of the effect that a loss or malfunction of the following will have on the CCWS: Valves

Suggested Testing Environment: In Plant

Alternate Path: Yes No **SRO Only:** Yes No **Time Critical:** Yes No

Reference(s):
LOP-WS-01, Revision 13, Service Water System Startup
LOA-WS-201, Revision 7, Loss of Service Water

Actual Testing Environment: Simulator Control Room In-Plant Other

Testing Method: Simulate Perform

Estimated Time to Complete: 20 minutes **Actual Time Used:** _____ minutes

EVALUATION SUMMARY:

Were all the Critical Elements performed satisfactorily? Yes No

The operator's performance was evaluated against standards contained within this JPM and has been determined to be: Satisfactory Unsatisfactory

Comments: _____

Evaluator's Name: _____ (Print)

Evaluator's Signature: _____ **Date:** _____

INITIAL CONDITIONS

1. You are an extra NSO
2. Unit 2 is in Mode 2 following a refueling outage
3. Unit 2 is placing Service Water in service IAW LOP-WS-01, "Service Water System Startup" and the previous shift has completed through Step E.13.
4. The previous shift started Service Water Jockey Pump 0WS02PA.

INITIATING CUE

Place Service Water in service on Unit 2 IAW LOP-WS-01, "Service Water System Startup" starting with Step E.14.