Palo Verde 2020-11 Draft Operating Test Comments

NOTE: This summary is being provided in lieu of Form 301-7, "Operating Test Review Worksheet," because the licensee's operating test submittal was reviewed and overall deemed SATISFACTORY.

Generic Scenario Changes

- Added "There are no personnel to Containment" for all scenarios
- Added operator positions for all events

Scenario 1:

- Driver Setup – Added note to place Protected Equipment placard over AFB-P01 and AFN-P01
- Crew Turnover – Added that AFB-P01 and AFN-P01 are protected
- Event 1 – No changes
- Event 2 – **Specify CS Header valve number**
  - Added valve number
- Event 2 – **Include Appendix C checklist**
  - Included checklist
- Event 2 – Added LCO 3.7.11 if Essential Filtration fans are stopped
- Event 3 – **Not a separate component failure**
  - Removed event as a separate component failure. Adjusted 301-5 and 301-6
- Event 3 – **Specify DNBR limit for TS 3.2.4 entry**
  - Added the POL indication that the examinee will be looking at
- Event 5 – **Specify MSIS and CSAS actuation setpoints**
  - Added setpoints
- Event 5 – **Add critical task for securing RCPs**
  - Added critical task
- Event 5 – **Terminate after entering ESD procedure**
  - Updated termination criteria

Scenario 2:

- Driver Setup – Added taking CEDMCS Mode Selector Switch to Auto Sequential. Added note to place Protected Equipment placard over AFB-P01 and AFN-P01
- Crew Turnover - Added that AFB-P01 and AFN-P01 are protected. Added the status of MFPs
- Event 1 – **Specify affected SG**
  - Specified affected SG
- Event 1 – **Proceed to next event once DFWCS alarms reset**
  - Adjusted the point to move to the next event
- Event 2 – Added the specific battery charger breaker to the Driver Cue
- Event 3 – **Actions to take load off the turbine/borate**
  - Added an Examiner Note that says that if the crew is slow to stop the boration that they will need to take load off the Main Turbine to raise pressure
- Event 3 – Added breaker noun names to Driver Note
- Event 4 – No changes

- Event 5 – **Add TS call 3.1.5 cond A, 3.2.4 A, 3.2.1 A, 3.2.3 A**
    - Added all LCOs. Also added note to the Driver to record POL values. Added Examiner Note to ask the CRS to evaluate Tech Specs post scenario.
- Event 5 – Removed boration steps since a boration will not be needed
- Event 6 – Added driver note for the Attachment 58A performance

Scenario 3:

- Driver Setup – Added note to place Protected Equipment placard over AFB-P01 and AFN-P01
- Crew Turnover – Added that AFB-P01 and AFN-P01 are protected
- Event 1 – No changes
- Event 2 – **Specify unaffected channel**
    - Specified 100Y
- Event 3 – **Add applicable RM alarms**
    - Added all applicable RM alarms
- Event 3 – **Specify steps to isolate letdown**
    - Included valves that will isolate letdown
- Event 4 – Removed move changing blowdown constants from move on point
- Event 5 – **Specify procedural source for guidance provided**
    - Added procedural source for guidance
- Event 6 – **Add RM alarms expected**
    - Added expected RM alarm
- Event 6 – **Containment sump, humidity info, sump, temp info**
    - Added Containment parameters to expected indications
- Event 6 – **Determine leak rate steps and add**
    - Added appendix for leak rate determination
- Event 6 – **TS expand 3.4.14 A**
    - Expanded TS information
- Event 7 – **Add note that operator will have to manually start HPSI A**
    - Added Examiner note
- Event 7 – **Add SIAS setpoint and time 30 minute clock starts**
    - Added setpoint and when time starts
- Event 7 – **Add when LOCA starts for 30 minute clock on H2 Analyzers**
    - Added start time
- Event 7 – **Add additional leak rate from Event 6**
    - Added leak rate

Scenario 4:

- Driver setup – Added SG feed rate and RCS temperature
- Crew turnover – Added detail to the turnover
- Event 1 – Added wait time for Driver Cue
- Event 2 – **Add RCP AOP steps**
    - Added steps

- Event 3 – **Add AFW valve numbers and note that they will close the valves**
    - Added valve numbers and that the valves will be closed
- Event 3 – **LCO 3.3.6 need I&C cue fuses blown**
    - Added cue
- Event 3 – **Add table C2 from Appendix C**
    - Added appendix
- Event 3 – **TS 3.6.3 applies**
    - Verified with Operations 3.6.3 does not apply and removed from the scenario
- Event 4 – **Add note to what unaffected channel is expected to be switched to (Tave 2) and volts (4.3v)**
    - Added the expected channel and voltage
- Event 4 – **Add note to specify CEDMCS desired mode of operation (manual sequential)**
    - Added note
- Event 4 – **Auto trigger Event 5 when report made**
    - Changed Event 5 initiation to when report to CRS is made
- Event 7 – **Specify to feed using AFA-P01**
- Added

JPM S1:

- Where does 11 minute time limit come from?
    - The site has an agreement with NERC that says the site will lower Main Turbine load up to 600 MW within 15 minutes of the request. It will take 4 minutes from receiving the phone call from the ECC to get to the step when action is actually taken (start time of the JPM), therefore 11 minutes.

JPM S-2:

- Where does 5 minute time limit come from?
    - 5 minutes is a Time Critical Action from the time a RAS initiates to ensure that HPSI suction has shifted to the Containment sump and to ensure that RWT Outlet isolation valves have closed.

JPM S-3:

- Changed validation time to 5 minutes

JPM S-4:

- Possible to somehow time compress Step 4?
    - Discussed and determined not to time compress

JPM S-5:

- In task standard, “FVIW” should be “FWIV.”
    - Revised
- Changed step 9 to ‘one set’, step 12 to ‘OR’, 13 to ‘one set’, 18 to ‘OR’

JPM S-6:

- JPM has wrong title (remotely start)?
    - This is not the title of the JPM, this is the task used from our Master Task List
- Where does 5 minute time limit come from?
    - 5 minutes was determined from engineering data that would be a conservative estimate of when damage would occur from reverse motoring a diesel.

JPM S-7:

- Changed validation time to 7 minutes. Added “another operator will complete procedure” at termination

JPM P-1:

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JPM P-2:

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JPM P-3:

- What method should be used to communicate with local operator in step 6?
    - The cue indicates that the operator will be contacted using a radio

JPM A-1:

- Initiating cue provides student with specific reference needed to arrive at correct answer. Change to “per Palo Verde administrative procedural requirements.”
    - Changed cue to “per Palo Verde administrative procedural requirements.”

JPM A-2:

- Is providing student with what specific reference is required to evaluate answer necessary?
    - Changed cue to “per plant procedural requirements”
- Change validation time from 5 minutes to 10 minutes?
    - Discussed during Prep Week and determined to keep validation time 5 minutes

JPM A-3:

- In initiating cue, change “Per LCO 3.4.12, Pressurizer Vents,” to “Per Technical Specifications.”
    - Changed cue to “per Technical Specifications”
- Corrected task standard to only include critical steps
- Added handout with Pressurizer Vent drawing

JPM AS-4:

- Removed ‘unisolable’ from cue.
- Used ‘Auxiliary Operator’ for position instead of ‘AO’

JPM A-5:

- Run this first on administration day so all operators have same start time
    - Scheduled
- Corrected task standard to only include critical steps
- Add time critical requirement in critical step.