

FA2021-301 Applicant Comments:

SRO A.1.b SRO –

Applicant comment: Eric Ritter (Docket Number 75671) / Jeffrey Troupe (Docket Number 75668) / Aaron Shelly (Docket Number 75666):

With only 7 SO's, 1 SO designated as T.S. position. If you decide to use a fire Brigade SO as the T.S. position and only 3 vice 4 Fire Brigade SO, there doesn't appear to be any written guidance for if the missing Fire Brigade members can't be met due to a sickness on shift.

Facility Response: Facility Disagrees.

A1818085, NFPA 805 FIRE PROTECTION PROGRAM DESIGN BASIS DOCUMENT:

4.7 Fire Response

4.7.1 Compliance Requirements

NFPA 805, Section 3.4.1, "On-Site Fire Fighting Capability" states that:
"All of the following requirements shall apply. Emergency response procedures for the plant industrial fire brigade.

(a) A fully staffed, trained, and equipped fire-fighting force shall be available at all times to control and extinguish all fires on site. This force shall have a minimum complement of five persons on duty and shall conform with the following NFPA standards as applicable:

Due to the fact that the NFPA805 is part of our licensing basis, in the absence of other guidance, the 2 hour requirement of Technical Specifications is applicable and would be applied if the Fire Brigade were to fall below the minimum manning.

Question 94 –

Applicant comment: Matthew R. Miller (Docket Number 73454)

Initially I had picked the correct answer on this question but I eventually changed it to D due to reasoning that the 2C DG was not TS related and would only result in minimal impact to safety on the site. I also reasoned that having the dampers failed open that no SSCs would be impacted. Based on the instructions in section 4.1 and 4.2.1, this is why I changed my answer.

Here are some previous questions from exams that refer to the section that I was referring to on page 4.1.1 of page 7.

DEV/MAN/PRO-52303A01 006

PLT PROCED-52303A01 001

Facility Response: The facility recommends removing the question from the exam.

The intent the question was to have the applicants to determine whether or not the 10 CFR 50.59 process is required to be entered based on conditions in the stem (Supervisor review prior to installation) and then determine if they, as the SRO (Shift Supervisor) can authorize the installation of the Temporary Configuration Change (TCC). The last word of the first fill in the blank should have been **screening** and not “evaluation” since these are two different processes.

When it is determined that a TCC meets certain criteria, such as the conditions in the stem, then a 10 CFR 50.59 Screening is performed and the results determine if an evaluation is required.

1. There is not enough information in the stem for the applicants to perform a 10 CFR 50.59 screening. It would require access at a minimum to NMP-AD-010, 10 CFR 50.59 Screening and Evaluations and the FSAR.

2. Additionally, a special qualification is required to perform these screenings and the SROs are not required to have this qualification.

Per NUREG-1021 ES-403, D.1:

b. Despite the extensive reviews performed by both the NRC and the facility licensee before examination administration (refer to ES-201, Attachment 5), it is possible that a few isolated errors may be discovered only after an examination has been administered. The following types of errors, if identified and ES-403, 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**
- a question that is at the wrong license level (RO versus SRO) or **not linked to job requirements.**

The question was based on an actual TCC which did **not require an evaluation**