

**STP 2021-07**  
**Draft Operating Test Comments**

NOTE: This summary is being provided in lieu of Form 301-7, "Operating Test Review Worksheet," because the operating test was NRC-developed. Comments reflect exam validation.

ALL Scenarios – include a scenario summary at the beginning, where the scenario objectives are.

Scenario 1 (100% BOL):

1. ~~D1 – Event 8 add "(LOCA O/S CTMT)" for clarity.~~
2. ~~Event 1 – Add steps for RCS boration and turbine load reduction.~~
3. ~~Turnover sheet: explicitly direct the Primary Operator to perform the boration and the Secondary Operator to perform turbine load reduction.~~
4. ~~Event 3 – all actions should be credited to BOP, not RO.~~
5. ~~Event 3 – page 11 of 44, BOP stops battery room exh fan 11A not 11G.~~
6. ~~Event 8 – page 26 – Unbold actions to Ensure SI MOV 1B CLOSED and RESET cmtmt spray auto act train B – these are not CRITICAL.~~
7. ~~Critical Task 3 – change acceptance criteria to PRIOR TO COMPLETING FR Z1. Because EO00 doesn't explicitly direct manually initiating GS.~~

Scenario 3 (98% BOL):

1. ~~D-1 – Event 4 remove credit from the BOP for NI CH 41 failure ... RO event only.~~
2. **Event 1 – include guidance in turnover sheet for Primary Operator to perform dilution and secondary operator to increase turbine load.**
3. ~~Event 8 page 25 – there are more steps that are performed than what is documented. Include.~~
4. ~~CT 52 page 28 – CT bounding criteria I wrote down that validator also opened MOV-025. Also, revise last part of NOTE to say "...or emergency boration can occur until RCS boron concentration is > 2800 ppm"~~
5. **D-1 Event 5 – remove verbiage that local action required to trip RTB – not correct.**

Scenario 4 (Intermediate Range MOL)

1. ~~D-1: event 2, credit to BOP, not RO.~~
2. ~~D-1: event 5, replace with RO event, CCP breaker overcurrent trip, also TRM call.~~
3. ~~Event 1 – specify SUR limit is 0.5 DPM.~~
4. ~~Event 4 – page 14, tech spec call, add that "If crew attempts to close C AFW-OCIV MOV-0085, it will not close and SRO would be expected to enter TS 3.6.3.a because it will be identified as INOP.~~
5. ~~CT 11, pg 26 "Close CV MOV-0079"~~
6. **CT page 30 "Reduce at least 2 steam generator PORV or Steam Dump setpoints < 1000 psig within 45 minutes of initiation of the SBLOCA". ← Currently says "between 990 and**

1000 psig" ... I believe that "less than or equal to 1000 psig" is sufficient ... if they go less than 990 it would be a performance deficiency but not a CT failure I believe ...

Scenario 5 (85% BOL):

- ~~1. Event 1, dilution to Primary, turbine increase to Secondary.~~
2. Turnover sheet: explicitly direct the Primary Operator to perform the dilution and the Secondary Operator to perform turbine load increase.
3. Event 3 tech specs, page 15 use 2015 format for full documentation.
- ~~4. Event 6 page 26, delete comment that "RCS Tave will be trending down but MSIVs are closed"~~
- ~~5. Addendum 5 page 34, document Fan #'s to be manipulated.~~

JPM S1:

- ~~1. After alternate path begins, another operator will acknowledge further alarms.~~

JPM S-2:

- ~~1. Task standard: DELETE "or exceeding the TS limit of 9100 gallons" as it's redundant to the HI alarm.~~
- ~~2. JPM step 1: include in initial condition to student "0PSP03-RC-0006 RCS Inventory is NOT in progress."~~
3. Per discussion on validation, Revert to Unit 1 for this JPM. Due to the T MOD for lower accumulator pressure in Unit 1 not being modeled in the simulator (but incorporated into the procedure), applicant should use UNIT 2 value for accumulator pressure in step 5.8. On procedure handout, One line out and initial Unit 1 value in Step 5.8, as a US or SM would do. Include instruction in handout to use UNIT 2 values for accumulator pressure only. Note in initiating cue says "temporary mode" instead of "Mod".

JPM S-3:

- ~~1. Add to task standard, "CCW Pump 1A has been secured before surge tank level = 0%"~~

JPM S-4:

1. No comments at this time.

JPM S-5:

- ~~1. Validation time = 5 min~~

JPM S-6:

1. No comments at this time.

JPM S-7:

- ~~1. Task standard: delete reference to tripping pZR backup heaters, add that should attempt to manually close 655C FIRST.~~
- ~~2. Step 1 standard, should be RC-PCV-0655B? or is C correct?~~
3. Examiner cue at end of JPM (and before step 1), revise to "...another operator will perform EO00 and instruct the Operator to continue with the procedure in effect."
- ~~4. Initiating Cue: "...you are directed to procedurally respond to alarms ..."~~

JPM S-8:

JPM P-1:

- ~~1. Add a second picture for closed breakers~~

JPM P-2:

- ~~1. Step 2, in cue, add "Another operator will perform Alarm Response Procedure, continue with checklist".~~
- ~~2. Step 3 – put the examiner cues after each bulleted light to be checked. Give a position, don't document "as you see it." Master Trip Circuit 'reset' amber light was OFF in plant when we validated. Bold the "DG AVAILABLE FOR EMERGENCY" verbiage. Just trying to make the read through of this flow better.~~
3. Step 4 – The procedure says "ensure" ... the applicant shouldn't need to be cued by the US to reset the Field Ground Dev 64F. At most, US should say "Implement procedure as written".
4. Step 4 – add cue after flag reset on FIELD GROUND DEV 64F, "flag is now black".

JPM P-3:

1. Step 5 cue, the applicant should himself find FC-0011B, and demonstrate how he would open it. Then examiner inform applicant that another operator reports gauge FC-FI-1408 now indicates "9".
2. Step 5 cue: Delete the verbiage "Instruct operator to locate gauges first" and "Now instruct operator to locate valves adding that" Examiner should not be instructing the applicant to do this, they should do this per the procedural direction. Also replace "Ensure the operator" with "After the operator".
- 3.

JPM A-1:

- ~~1. Step 5: DELETE note from standard that operator may state it is not possible to determine SAT or UNSAT.~~

JPM A-2:

- ~~1. Task standard: "The applicant must successfully identify that N44L should be 424.5, accurately re-calculate the QPTR to at least 2 decimal places in accordance with key, and ..."~~
- ~~2. Step 1 standard should say NI 44~~
3. Step 2 standard should include Sum IL – 4.072 and Avg IL – 1.018.

JPM A-3:

- ~~1. Task standard, add note to AFW Pump 11: (position: none req'd for caution, required for danger)~~

JPM A-4:

JPM A-5:

1. Create a 2<sup>nd</sup> cue sheet to be given to applicant directing to determine any applicable tech specs, if they answer unacceptable. **Initiating cue sheet #2 doesn't need to repeat the same verbiage from cue sheet 1 – it will be confusing.**
- ~~2. Task standard: "SDM calc is in error due to 2 RCCA INOP vice 1, calculates correct SDM – 241 pcm ..... In accordance with the key."~~

- ~~3. Step 6 note: 2<sup>nd</sup> cue sheet for TS applicability only in applicant determines surveillance is Unacceptable.~~

JPM A-6:

- ~~1. Task standard: "... and calculates the correct as-found and as-left difference IAW key." Delete rest of 1<sup>st</sup> paragraph. Include more detail about tech spec call in second paragraph, functional unit, action statement. Include "Functions 2 & 3, Action 2a." in task standard.~~
- ~~2. Step 1 cue: "... but doesn't know whether data sheet 2 or 3 is correct, then inform .."~~
- ~~3. Step 1 standard ... calculates correct as-found and as-left difference per key.~~

JPM A-7:

- ~~1. Task standard... "... With 2AF-0040 NOT closed, Train A AFW is INOPERABLE per TS 3.7.1.2 ACTION A."~~

JPM A-8:

JPM A-9:

1. No comments at this time.

OTHER COMMENTS