Dresden 2023 Initial License Exam Operating Test Outline Review Comments

JPM Outline Comments		
1.		(<u>Control Room Systems / JPM a.</u>) – This appears to be an overlap with Scenario ILT-N-2, Event 3 control rod overtravel.
	Facility:	Event has been changed in Scenario ILT-N-2 to a Control Rod Drift Out.

Simul	Simulator Scenario Outline Comments		
1.	NRC:	(<u>Scenario ILT-N-1</u>) – With an Emergency Depressurization required in this scenario, why is preventing an Automatic ED a critical task? This scenario easily meets minimum CT requirements, recommend removing this CT.	
	Facility:	Critical task has been removed.	
2.	NRC:	(<u>Scenario ILT-N-2</u>) – This is a low power ATWS, it does not seem likely that the large oscillation threshold will be exceeded even if operator action to insert control rods is not timely. What would be considered the large oscillation threshold?	
	Facility:	Removed Critical Task as LOT would not be reached. LOT is ~20-25% Reactor Power.	
3.	NRC:	(<u>Scenario ILT-N-3</u>) – What is the malfunction post EOP entry which impacts the mitigating strategy? The EOP inducing malfunction is the HPCI steam leak, but there does not appear to be a subsequent malfunction which adversely impacts the mitigating strategy.	
	Facility:	Added subsequent malfunction and changed critical task to reflect failure of ERV to open during Emergency Depressurization.	
4.	NRC:	(<u>Scenario ILT-N-4</u>) – When must DEOP 0400-1, RPV FLOODING be entered by after level indication is lost? What indications would be available to the crew that would indicate that reactor conditions have adversely deteriorated due to improper crew actions taken by not entering RPV FLOODING?	
	Facility:	The medium range level detector will fail high which will cause the RFPs to trip which will drive the crew to enter DEOP 400-1.	
5.	NRC:	3 of the 4 scenarios have normal events which are a simple pump swap. To avoid overlap, consider if there is something else that can be performed in place of one of the three pump swaps.	
	Facility:	In Scenario 1 (ILT-N-1) changed the pump swap to reversing Circ Water flow through Main Condenser.	

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Simulator Scenario Outline Comments		
6.	NRC:	(Form 3.4-1, Events and Evolutions Checklist) – SRO candidates should only get credit for manual control evolutions when they are standing in the ATC or BOP position. Per NUREG 1021 manual control actions require specific verifiable action steps for the applicant. In addition, NUREG 1021 specifically indicates that upgrade candidates are not required to perform manual control actions since they are generally not expected to stand watch as an ATC or BOP. Removing manual control credit for the SRO instant candidates when they are in the role as the SRO still leaves all candidates with at least 1 required manual control action so this is an administrative fix only. I have corrected the Form 3.4-1 to reflect this.
	Facility:	Updated From 3.4-1 to reflect this as well.

Written Outline vs. Operating Outline Potential Overlap Comments		
1.	NRC:	(Written Outline Item #8) – Ensure there is no significant overlap between In-Plant JPM k and written question 8 which both are associated with loss of instrument air and system valves/cross-tying.
	Facility:	There is no overlap
2.	NRC:	(Written Outline Item #28) – Ensure there is no significant overlap between scenario ILT-N-1, Event 8 and written question 21 which both have to do with operator response to a low reactor water level.
	Facility:	There is no overlap
3.	NRC:	(Written Outline Item #48) – Ensure there is no significant overlap between Simulator JPM f and written question 38 which both are associated with SRM drive control.
	Facility:	There is no overlap
4.	NRC:	(Written Outline Item #49) – Ensure there is no significant overlap between scenario ILT-N-3, Event 5 and written question 39 which both test APRM indications as read on the 2PM05J.
	Facility:	There is no overlap
5.	NRC:	(Written Outline Item #64) – Ensure there is no significant overlap between scenario ILT-N-4, Event 7 and SRO written question 87 which both test operator actions required for a loss of RPV Level indication.
	Facility:	There is no overlap.

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Written Outline vs. Operating Outline Potential Overlap Comments		
6.	NRC:	(Written Outline Item #94) – Ensure there is no significant overlap between SRO Admin JPM A4 and SRO written question 100 which test the applicant's ability to classify an emergency declaration.
	Facility:	Changing SRO Admin JPM to prevent overlap. New JPM will be establishing a Fire Watch.