

Clinton 2023 Initial License Exam Operating Test Outline Review Comments

JPM Outline Comments		
J1.	NRC:	(Form 3.2-1, <u>Administrative Topics Outline / SRO / Radiation Control</u>) – A JPM to authorize Emergency Exposure for a Life-Saving Operation has been included on the previous 3 NRC Examinations (2022, 2021, and 2019). Please change the K/A FROM G2.3.14 TO G2.3.6 and select/create a different/appropriate JPM to test the new K/A (G2.3.6 – Ability to approve liquid or gaseous release permits (CFR: 41.13 / 43.4 / 45.10) SRO IMPORTANCE 3.8).
	Facility:	Unable to write JPM to K/A G2.3.6 – CPS does not perform radioactive releases. Changed K/A to 2.3.12 and submitting new JPM.

Simulator Scenario Outline Comments		
S1.	NRC:	(Form 3.3-1, Scenario Outline, <u>Scenario 1 / Event #8</u>) – Event #8, “(NEW) Inadvertent Group 1 Isolation / Partial ATWS / RCIS Lockup”, appears to be the same as Event #8 in Scenario 4 of the 2021 NRC Exam (including identical malfunction numbers). What (if anything) is different in the current exam’s Event #8 that warrants the “NEW” label?
	Facility:	The RCIS Lockup is new; corrected the scenario outline to reflect the additional malfunction.
S2.	NRC:	(Form 3.3-1, Scenario Outline, <u>Scenario 1 / Critical Task #2</u>) – CT-2, “Inhibit ADS within 105 seconds of RPV level reaching Level 1 (-145.5” Wide Range)” ... Is reaching -145.5” Wide Range a guarantee? Why will RPV level be dropping? Is HPCS not available? Is the level drop only due to intentionally controlling/lowering power during the ATWS?
	Facility:	Upon review, this CT is not valid for the given plant conditions per revision 12 of NUREG-1021. Removed this CT and added a new CT-2 that meets requirements.
S3.	NRC:	(Form 3.3-1, Scenario Outline, <u>Scenario 2 / Event #11</u>) – Event #11, “... TCV #2 sticks at 25% ...” The detailed description states “... #2 control valve will stick at 20% ...” Please correct whichever value is wrong.
	Facility:	The correct value is 25%. Corrected scenario outline to reflect this.

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Simulator Scenario Outline Comments		
S4.	NRC:	(Form 3.3-1, Scenario Outline, <u>Scenario 3 / Event #9</u>) – Event #9, “(NEW) RCIC failure / 6.9KV Bus 1B loss / HPCS Pump fails to auto start / HPCS Injection Valve fails to auto open”, appears to be the same as Event #8 in Scenario 3 of the 2022 NRC Exam (“6.9KV Bus 1B loss” is different in the title but the malfunction numbers are identical). What (if anything) is different in the current exam’s Event #9 that warrants the “NEW” label?
	Facility:	This is an error. This event is not “NEW.” Corrected scenario outline to reflect this.

Written Outline vs. Operating Outline Potential Overlap Comments		
W1.	NRC:	None
	Facility:	N/A