

Byron Station Initial License Operating Test Outline NRC Feedback:

JPMs:

RO Admin:

- RO Admin JPMs appear to have all admin tasks completed either in the Simulator or in the Control Room which makes the Admin portion more of a simulator test rather than an administrative type test. This is allowed per the NUREG, however, based on number of candidates and exam schedule, will not be most efficient method to administer admin JPMs. If there are classroom JPMs that can be used in place of one or two of the simulator JPMs, then they can be administered to a group of candidates more efficiently.
- RO Admin Task, RA-3: Appears to be marked incorrectly for the Type Code on Form 3.2-1 where it is marked as 'C' for Control Room. **Should this be marked 'R' for classroom?**
- All requirements of Form 3.2-1 for type and proper number of JPMs are met SAT.

NRC: All comments addressed after phone call discussion of OP Test Review. Changes incorporated into prepared exam documents

SRO Admin:

- All requirements of Form 3.2-1 for type and proper number of JPMs are met SAT
- SRO Admin Task, SA-1: Type Code is documented as 'S' for Simulator. What tasks need to be performed in the simulator for this JPM? Based on the description, it appears that the candidates will only be reviewing a completed surveillance and determining status of acceptance criteria.
 - Description of task has misspelling for candidate on the first word of description.
- SA-2, SA-3, SA-4, and SA-5 all are Type Code 'C' for Control Room. I believe these should all be 'R' for Classroom and not Control Room.
- SA-4: Task does not align to the assigned K/A for this JPM. There does not appear to be a direct link from the description of the task to how the candidates will be demonstrating knowledge of emergency action level (EAL) thresholds through the assessment of Byron Status Trees and recommending appropriate BFRs. This task will be assessed through the scenario portion of the exam. **Will the candidates be required to make an EAL classification in this JPM?**

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Simulator JPMs:

- All requirements for Form 3.2-2 for type and proper number of JPMs are met SAT.
- Please provide a description of the failures for the following JPMs: a, c, e, j. Being that the alternate path JPM is at the minimum, I want to verify that the alternate paths meet NUREG requirements to satisfy a true alt path and not jeopardize the minimum count for the op test.

Scenarios:

Scenario N23-1:

- Event 8 has Event Type as 'F' which is not an approved classification. Either remove the 'F' or change it to 'M' as the failure is part of the Major event. **This has been incorrectly marked for all scenarios. Please make changes to each Form 3.3-1.**
- CT-3: What is the expected time to reach a red path for Containment CSF?
- CT-36: Bounding criteria is 5% in RWST. Is this scenario as described in Event 7 & 8 LOCA going to have a large enough leak such that RWST level will be lowering fast enough to get to the point to transfer to cold leg recirculation? What is expected time to reach low-low RWST level and make BET ES-1.3 transition per BEP-1, Step 13? Concerns of overall scenario timing.
- Scenario 23-1 Summary Sheet Comments:
 - Description paragraph needs to be updated to include Unit 1: "The scenario will start with *Unit 1* at 55% power..."
 - Event 4 does not provide TS number or condition the SRO is expected to call as described in Event 3

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Scenario N23-2:

- Event 5 on Scenario Summary states "Due to elevated outdoor temperatures..." This is not described in the scenario description at the beginning of the summary document. Will this be included in the scenario turnover to the applicants and be readily apparent?
- Event 6: Will there be a manual control function for this event when restoring letdown and controlling pressurizer level that is not being accounted for?
- Event 7: Will there be a manual control function for the BOP controlling SG Level?

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Scenario N23-3:

- Event 6 is counted as a Component failure AND a Reactivity manipulation for the BOP on this event on Form 3.3-1 but not identified as such on Form 3.4-1. NUREG-1021, ES-3.4, Section C.2 states in the Note of Item 8 that a Component and Reactivity manipulation cannot count for both for the same position. If a component failure leads to a power reduction, the Component failure can count for the BOP and the subsequent Reactivity manipulation can count for the ATC but not for the BOP.
 - **If the event is classified as C for the BOP and not an R for the BOP, SRO-I candidate, Lohse, does not have a Reactivity manipulation at the BOP/ATC positions as required per Item 2 in ES-3.4, Section C.2. Since this event is not classified as a Component failure on Form 3.4-1, suggest removing the C for the BOP on Form 3.3-1.**

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Scenario N23-4:

- Turnover for this scenario has the 1A MFP and 1B HD PP tripped and out of service with further HD pump issues later during the scenario. This is the only scenario with this initial condition and is considered leading. Is it possible to include this out of service components into another scenario for the set of this exam?
- Scenario Summary page, Event 2 is missing the LCO and Condition that the SRO is expected to determine similar to Event 6. Include the LCO and condition.

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Scenario N23-5:

- Scenario Summary Sheet, Event 4 does not have the TS LCO and Condition that the SRO is expected to determine similar to Event 5.
- Scenario Summary Sheet, Event 8 states that the crew will need to initiate a manual reactor trip even though Event 7 states that the US will order a trip of U-1 following trip of the 1A RCP. Is it expected that the crew re-perform the RX trip?
- CT-17 bounding criteria may be a bit vague. Should the crew not take any action to transition out of 1BEP-2, then this may not be valid bounding criteria for this critical task. Is there another, more specific, bounding criteria that may be used?
- CT-12 does not have bounding criteria to be graded against. It simply states to actuate MSI. Including bounding criteria that meet NUREG requirements.

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Form 3.4-1:

- Noted for all crews and all events: Any SRO-I that is standing in the SRO position for the associated scenario is not marked as getting credit for all of the I/Cs that occur in the scenario. It appears that select events are counted for these candidates. The minimum numbers are met for these candidates so there is not an issue.

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Crew B:

- SRO-I applicant, Wright, is marked for getting credit with a TS in Scenario 2 for event 2 when standing in the ATC position. Remove this from Form 3.4-1, and change total for TS to 4 from 5.

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