

Form 2.3-3 Operating Test Review Worksheet (JPMs)

Facility: Fermi II				Exam Date: June 12-13, 2024									
1 JPM # or title	2 Type (S/P/A)	3 ALT (Y/N)	4 LOD (1-5)	5 JPM Errors							6 U/E/S	7 Explanation	
SRO ADMIN				LOD	REF	IC	TSK	CUE	CS	TL			
A1.1 Thermal limit verification (MAPRAT)	A	N	3									E	NRC: 1) A key with the day shift portion of the table filled out would be helpful. Licensee: 1) A KEY was created, with Critical Tasks marked with an *. The KEY was attached to the body of the JPM and will be printed with the JPM for the evaluator. NRC: 1) JPM is sat as revised.
A1.2 Evaluate plant chemistry results	A	N	3									S	

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<p style="text-align: center;">A2 Evaluate offsite power sources under degraded grid conditions</p>	A	N	2							E	<p>NRC:</p> <ol style="list-style-type: none"> 1) Check JPM title. "Evaluate degraded power sources..." or Evaluate <i>offsite</i> power sources...?" 2) Is the initiating cue leading? By directing the applicant to section B.1, they're being told that 345kV and/or 120kV Mat post trip voltages not sufficient to sustain operability of safety-related loads. By directing the applicant to perform 20.300.GRID and Action A.1 has been completed (with the current initial conditions), the applicant would have to evaluate each section's applicability. 3) Evaluator cue states to "inform examinee to perform 20.300.GRID action B.2". This is an action to enter a TS. Evaluator should not be cueing to enter a TS. <p>Licensee:</p> <ol style="list-style-type: none"> 1) Changed JPM title to "Evaluate Offsite Power Sources Under Degraded Grid Conditions" 2) Agree that directing the examinee to perform B.1 specifically is leading. However, the recommended change is not how this task would be directed from the CRS, since we are telling the examinee that they are an "extra" SRO on shift. Recommend changing (and this change has been made and uploaded) to the Cue to state, "The SM directs you to perform Actions of Condition B of 23.300.GRID" which is how this would be directed, and removes specific guidance to perform just B.1, which was the leading component. With the Cue, the examinee still has to evaluate the given voltages, against the AOP, to determine the impact. Doing this also helps address Concern 3) below by allowing the leading evaluator cue to be removed. 3) Evaluator Cue has been removed.
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												NRC: 1) Cueing concerns from comments 2 & 3 alleviated. JPM is sat as revised.

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<p style="text-align: center;">A3 Initiate authorization to exceed dose control threshold</p>	<p style="text-align: center;">A</p>	<p style="text-align: center;">N</p>	<p style="text-align: center;">3</p>					<p style="text-align: center;">X</p>			<p>NRC:</p> <ol style="list-style-type: none"> 1) Is it clear that the area between the lead blanket and the valve is considered "general area", such that the dose rate is 6000mr/hr and not the on-contact dose of 40,000mr/hr? Applicant may question the dose rate based on the survey map, as it doesn't appear to be much room between the blanket and the valve. 2) If the valve is above the operator's head, do we need an evaluator cue if the applicant asks if the operator needs to inspect the top part of the valve (however the valve is positioned)? 3) Where is the Fermi admin dose limit described? MRP12 lists a range of 2000-4000mr TEDE Fermi Dose, but while implied, it does not define that as the Fermi admin limit. 4) Providing the operator's SSN in the initial conditions can be seen as cueing, as the applicant does not need this info to determine whether or not the dose threshold is exceeded. Only after that determination is made, the applicant would need that info. Recommend making this an evaluator cue. <p>Licensee:</p> <ol style="list-style-type: none"> 1) An evaluator Cue has been added, as RP, to inform the examinee that there is room to stand between the pump and lead blanket. 2) The valve that needs inspecting is about eye level, maybe lower. It is at the pump's discharge and not on the pipe that is overhead. 3) This information is located in a different Radiation Protection Manual, MRP03. It is information that is tested as part of every employee's General Employee Training (GET) and is also on the main screen when one access the Radiologically Restricted Area (RRA).
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SRO ADMIN				LOD	REF	IC	TSK	CUE	CS	TL			
												4) Removed Ronald Price's SSN from the Cue and added as an evaluator cue. NRC: 1) JPM is sat as revised.	
A4 Hostile action with the owner controlled area	A	N	2							X	U	NRC: 1) How is this JPM not time critical? The applicant is given a situation in which they have to declare an Alert, which is a 15 minute time critical action. JPM should be time critical with a 15 minute time limit, as this is what would be realistic – SM would have to take both of these actions with minimum staffing during an event. 2) Why does the applicant stop performance of EP-530 Encl B after making the announcement? Flowchart has actions to evaluate need to relocate personnel or take mitigative actions and potentially other actions after that. No cues exist to address this. Licensee: 1) Changed JPM to Time Critical. Revised accordingly throughout. 2) Added evaluator cue to provide information from Security if asked regarding step beyond the announcement step and added an additional step regarding the need to relocate personnel or take mitigating actions. NRC: 1) JPM is sat as revised.	

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CONTROL ROOM/SIM				LOD	REF	IC	TSK	CUE	CS	TL			
A P603 ATWS Actions – RWCU fails to isolate on SLC start	S	Y	3									S	
B Manually place RHR in LPCI Mode	S	Y	2									E	NRC: 1) Modify evaluator cue such that evaluator is not directing the applicant how to have success with the alt path (evaluator will concur with whatever the applicant recommends). Licensee: 1) Modified evaluator cue to direct the examinee to perform the recommended action (action recommended by the examinee). NRC: 1) JPM sat as revised.
C Enable a disabled pressure regulator	S	N	2									S	

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CONTROL ROOM/SIM				LOD	REF	IC	TSK	CUE	CS	TL			
D Fire in main turbine lube oil	S	N	2									S	<p>NRC: 1) 20.000.22 provided includes condition AW. This appears unnecessary.</p> <p>Licensee: 1) AOPs at Fermi 2 are printed out double-sided. Also, information on the odd-numbered page being implemented at the time (Page 49 in the case of this JPM, which is for Condition AX). Page 49 has a STRATEGY and NOTE that are found on the preceding page (Page 48). Since the AOPs are printed double-sided, page 47 (the "front side" of page 48) and page 50 (the "back side" of page 49) are also included. This will make better sense during Onsite Validation.</p> <p>NRC: 1) JPM is sat as submitted. No modification necessary.</p>
E RCIC steam leak with auto isolation failure	S	Y	2									S	

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CONTROL ROOM/SIM				LOD	REF	IC	TSK	CUE	CS	TL			
F Shutdown EDG 11 from MCR following a LOCA	S	N	3								E	NRC: 1) Ensure task standard uses "approximately" when referencing 300kW and 200KVARs Licensee: 1) Revised task standard to state "approximately 300kW and approximately 200KVARs." NRC: 1) JPM is sat as revised.	
N/A													
H Shift divisions of CCHVAC	S	Y	3								E	NRC: 1) Step numbers appear to be inaccurate. It appears step "6.1.3" should be step 6.1.2.3 (this is carried forward steps 6.1.2.3 through 6.1.2.8). 2) We can add the automatic chiller loading to the initial conditions to avoid the applicant asking during JPM performance. This doesn't provide any cueing. Licensee: 1) Corrected step numbering. 2) Added fact that chiller will be automatically loaded to the cue and removed evaluator cue from the body of the JPM. NRC: 1) JPM is sat as revised.	

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IN PLANT				LOD	REF	IC	TSK	CUE	CS	TL			
I Vent the scram air header	P	N	3									E	<p>NRC:</p> <p>1) Evaluator cues on valve operation should include cueing such as "Examinee describes rotating the valve handwheel clockwise and the stem inserts until resistance is felt. Then inform the examinee the valve is in the closed position." Stating "If examinee demonstrates how to properly close the valve" is leaves valve closure open to interpretation and unwritten system level knowledge (does the valve have a rising stem, reverse acting, MOV requiring declutching, etc).</p> <p>Licensee:</p> <p>1) Added additional information to evaluator cues for manual valve operation.</p> <p>NRC:</p> <p>1) JPM is sat as revised.</p>
J Realign for control from the dedicated shutdown panel	P	N	3									S	

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<p style="text-align: center;">K RBCCW differential pressure control – manual bypass operation</p>	<p style="text-align: center;">P</p>	<p style="text-align: center;">Y</p>	<p style="text-align: center;">3</p>					<p style="text-align: center;">X</p>		<p style="text-align: center;">E</p>	<p>NRC:</p> <ol style="list-style-type: none"> 1) How is the applicant expected to verify IAS is lined up to P42-F403? 2) Why is the evaluator cueing the applicant how to perform the alt path? Applicant should be making the determination of how to procedurally address the abnormality / inability to complete the procedure (i.e. they should be making the recommendation with an evaluator cue to concur with the recommendation). If there's a concern with the success path of the alt-path portion of the JPM, we have margin with alt-path JPMs and could make this a normal path JPM where the applicant is successful at valving the dP control valve. <p>Licensee:</p> <ol style="list-style-type: none"> 1) This is the only information provided in the procedure. No additional guidance is given as to what this means. There is one manual valve that the operator could check (and the valve may not even be labeled) to verify IAS is aligned. Recommend this be discussed during OV when in the plant with operators to ensure the JPM captures what is expected. 2) Changed JPM to Normal and revised outline to reflect this. JPM is now M (Modified from the Alt Path JPM in the BANK). This includes changing the JPM title and number on the outline <p>NRC:</p> <ol style="list-style-type: none"> 1) JPM is sat as revised. 2) During OV, added upstream IAS valve number to JPM to verify IAS is aligned (verify valve open). 3) With this JPM being not alt-path as revised, the minimum number of AP JPMs is still maintained.
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Form 2.3-3 Instructions for Completing the JPM Table

1. Enter the JPM number and/or title.
2. Enter the type of JPM—(S)imulator, (P)lant, or (A)dministrative.
3. Enter (Y)es or (N)o for an Alternate Path JPM.
4. Rate the level of difficulty (LOD) of each JPM using a scale of 1–5 (easy–difficult). A JPM containing less than two critical steps, a JPM that tests solely for recall or memorization, or a JPM that involves directly looking up a single correct answer is likely LOD = 1 (too easy). Conversely, a JPM with over 30 steps or a JPM that takes more than 45 minutes to complete is likely LOD = 5 (too difficult).
5. Check the appropriate block for each JPM error type, using the following criteria:
 - LOD = 1 or 5 is unsatisfactory (U).
 - REF: The JPM lacks required references, tools, or procedures (U).
 - IC: The JPM initial conditions are missing or the JPM lacks an adequate initial cue (U).
 - CUE: The JPM lacks adequate evaluator cues to allow the applicant to complete the task, or the evaluator cues are subjective or leading (U).
 - TSK: The JPM lacks a task standard or lacks completion criteria for a task standard (U).
 - CS: The JPM contains errors in designating critical steps, or the JPM lacks an adequate performance standard for a critical step (U).
 - TL: The JPM validation times are unreasonable, or a time-critical JPM lacks a completion time (U).
6. Mark the JPM as unsatisfactory (U), satisfactory (S), or needs enhancements (E). A JPM is (U) if it has one or more (U) errors as determined in step 5. Examples of enhancements include formatting, spelling, or other minor changes.

Briefly describe any JPM determined to be unsatisfactory (U) or needing enhancement (E). Save initial review comments and detail subsequent comment resolution so that each exam-bound JPM is marked by a satisfactory (S) resolution on this form.