

2005 Davis-Besse Outline NRC Review Comments

ES-201-2 Examination Outline Quality Checklist

ITEM	COMMENT
2.c.	<p>NRC: Cannot verify the following items on ES-301-4:</p> <p>Qualitative Items:</p> <ul style="list-style-type: none"> - 3, can't verify event descriptions; - 5, although items appear valid wrt physics and thermodynamics, don't have complete description and need simulator; - 6, need simulator; - 8, need simulator; - 9, scenarios haven't been validated at this time; -10, cannot verify, only have scenario cover page and short description; -11, licensee did not submit an ES-301-6 <p>Quantitative Items:</p> <ul style="list-style-type: none"> -5,6,7, cannot verify until have complete scenario writeups

Scenarios:

1)	<p>NRC: Proposed Rotation: Purpose of surrogate is to "complete" a crew if necessary, not to act as a member of each crew. Reconfigure crews using applicants in the SRO/RO/BOP positions unless there aren't sufficient number, then insert a surrogate. Ref: ES-1021, Section 302, D.1.j, p.4 of 12. Recommend four groups of 2 SRO-Is and 1 RO; and one group of 3 SRO-Is. Total = 3 scenarios / run 5 groups per day / 3 days (12 hr days).</p>
	D-B: Understand. Will review NRC proposal and revise rotation.
2)	NRC: Missing ES-301-6, competency sheet.
	D-B: Will submit ES-301-6 with exam. NOTE: Note required until exam submittal
3)	<p>NRC: Verify TS calls require "interpretation" not just "recognition." Appendix D of NUREG 1021 states that abnormal events for each scenario should require operators to recognize and interpret technical specifications. This recognition and interpretation can be incorporated into the scenario by designating TS-related equipment that is out of service at the start of the scenario.</p>
	D-B: Will rewrite at least one TS in each scenario to evaluate based on equipment out of service.
4)	NRC: No low power scenario.
	D-B: Acknowledged. Not required.

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Admin JPMs:

RO-Emergency Plan	NRC: RO job to calculate projected Offsite Dose Assessment calculation?
	D-B: This is RO function at Davis-Besse.

Written Exam KA Outline

1) RO	NRC: ES-401-2, Tier 2, Plant Systems; Group 1, K1=5, and K4=4. Note: 4 requires sampling every system or evolution in a group before selecting a second topic. The K1 and K4 appear to have a higher number of selected topics than the other KAs in the group.
	D-B: As described in submittal, a random generated program picked the KAs.
2)	NRC: ES-401-2, Page 6 missing "X" for K5, system 003.
	D-B: Will correct.
3)	NRC: ES-401-2, Page 8 has "K/A Category Point Totals:" for K1 and K2 interchanged.
	D-B: Will correct.
4)	NRC: ES-401-4, Page 12, 060 AK3.01, implementation of E-plan rejected because it is beyond scope of RO position, but RO E-plan admin JPM written for calculating projected offsite TEDE. Why?
	D-B: Performing the calculation is not implementation of the E-plan.
5)	NRC: ES-401-4, Page 12, 076 K2.04 because plant does not have RBCCW. Although not called RBCCW, is there a related system?
	D-B: Do have a component cooling system.