

| ADMIN JPMS | NRC Comment: | Licensee Action: |
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| A1-1 COO SRO: Review Estimated Critical Boron Concentration Calculation | 1) No completed Estimated Critical Boron Concentration or required figures provided with JPM, cannot verify calculations. | 1) Figures and calculations verified during validation. |
| A2 EC SRO: Initiate Tracking of Spent Fuel Pool Negative pressure Area Barrier | 1) JPM Step 3, how does applicant determine DB-OP-00018 and Form DB-0574 are applicable, ie, that a negative pressure barrier will be impaired during the release? Need to explain in "Standard." 2) JPM Step 4, what does applicant review in DB-OP-00018 to determine Section 6.3 applies and Form 0574 must be completed? 3) Where is Barrier Function logged on Form 0574? 4) JPM Steps are out of sequence after Step 8. 5) JPM Step 10 (incorrectly labeled 8) is not critical. | NOTE: JPM was re-written to clarify reviews of forms and conclusion of JPM when TS identified / entered. Reviewed during validation. |
| A3 RC SRO/RO: Perform Quarterly Functional Test of Radiation Elements 5052A, B, and C to Determine Operability | 1) Initial Conditions: replace 1 hour with 65 minutes for Containment Purge operation. 2) JPM Step 3, need cue for RI 5052C meter reading. 3) JPM Step 4, need cue for RI 5052C meter reading. 4) JPM Step 5, need cue for RI 5052C meter reading. 5) JPM Step 6, need cue for RI 5052C meter reading. 6) JPM Step 7, need cue for RI 5052C meter reading. 7) JPM Step 9, in comments, delete "If the Check Source..." statement. | Comments 1) - 7) incorporated. |
| A4 EP SRO: Given Conditions, Make a Protective Action Recommendation | 1) Replace SAE with General Emergency in IC. 2) JPM Step 1, need copy of RA-EP-02240, Att.2. 3) JPM Step 2, first bullet is not critical. | 1) Comment incorporated. 2) RA-EP-02240, Att.2 included and reviewed during validation. 3) Bullet deleted. |
| A1-1 COO RO: Perform a Shutdown margin Calculation NOTE: 2004 NRC exam. | 1) Need a completed form with range of numbers to be obtained from graphs or calculations, and those tolerances computed into the final acceptable numbers. | 1) Verified during validation week. |
| A4 EP RO: Calculate Projected Offsite Total Effective Dose Equivalent | 1) Need to provide data sheet with all required information, plus some extraneous indications, if not done in the simulator. 2) JPM Step 3, which range should applicants use (3.1)? | 1) Data sheet to be provided. 2) Range (4E-2uCi/cc) included in standard. |

| SYSTEM JPMS | NRC Comment: | Licensee Action: |
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| Control Room | | |
| a. RO: Restore Cooling to CRDs Following SFAS Actuation | 1) Delete Step 1, Initiating Cue already directs applicant to correct procedure section. 2) JPM Step 3 critical. | Comments 1) and 2) incorporated. |
| b. RO/SRO: Respond to a Loss of Normal RCS Makeup | In the JPM IC, need more explanation of what is going on, give applicant a CR position, ie, RO-ATC, or extra RO. Applicant may need time to walkdown the panels. Direct the applicant to respond to the alarm in order to prevent response to other plant parameters. | Applicant given position and directed to respond to alarm in Initial Conditions and Initiating Cue. |
| c. RO/SRO: Emergency Close Core Flood Tank Isolation Valve | 1) JPM Step 3 critical. 2) JPM Step 6, is the mechanical aid approved for use? 3) JPM Step 10, if the applicant releases the switch before JPM Step 10, do they fail (ie, what are the consequences)? 4) Step 11 not critical. | 1) Step 3 identified as critical. 2) Licensee could not identify mechanical aid was evaluated and approved for use. Turn over to SRI. 3) Applicant could re-perform step with no consequences. 4) Step 11 no longer identified as critical. |
| d. RO/SRO: Swap Operating DH Loops With RCS Cooling In Progress | 1) Lot of precautions, will require time for applicant to review and evaluate, can some of them be alleviated in the initial conditions or initiating cue? 2) JPM Step 2, evaluator cue not necessary because the information is already in the initial conditions. 3) JPM Step 3, "Standard," how does applicant successfully <u>verify</u> DH 1A open? 4) JPM Step 4, "Standard," how does applicant successfully <u>verify</u> CC 1469 open? 5) JPM Step 6, "Standard," how does applicant successfully <u>start</u> DH Pump 2 using HIS DH6A? 6) JPM Step 9, "Standard," how does applicant successfully <u>stop</u> DH Pump 1 using HIS DH6B? | 1) Will have Steps 3.11.1-3.11.7 complete in Initiating Cue. Should help alleviate some of the unnecessary review. 2) JPM Steps 1) and 2) deleted, and steps re-numbered. 3) Cue for light indication added to Standard. 4) Cue for light indication added to Standard. 5) Cue for switch position, light indication, and amps added to Standard. 6) Cue for switch position, light indication, and amps added to Standard. |
| e. RO/SRO: Trip TG | 1) JPM Step 5, "Standard," how does applicant successfully <u>verify</u> all Stop and Control Valves are closed? 2) JPM Step 7, "Standard," how does applicant successfully open and verify ACB 34563 open? | 1) Add valve position indication to Standard. 2) Description added to Standard. |

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| f. RO/SRO: Energize D2 Bus From Bus D1 | 1) JPM Steps 1-8, "Standard," how does applicant successfully <u>verify</u> breakers open? 2) JPM Step 12, "Standard," how does applicant successfully <u>verify</u> D2 energized by checking voltage? 3) JPM Step 17 incorrectly proceeds to Step 2 vice Step 1 of procedure, Att.2, Step 6.1. According to procedure Step 6.1, "If...200 hr rating of 2946 KW per <u>Step 2</u> ..." JPM Steps 17-23 don't apply to this JPM as written. Next JPM Step should be JPM Step 24. 4) Alternate path? No equipment failure or problem that requires significant diagnosis or decision making, or implementation of another procedure. | 1) Added light indication to Standard. 2) Added expected voltage indication to Standard. 3) Licensee verified the JPM correctly interpreted the procedure requirement during validation. 4) Applicant must recognize problem, implement decision making, and transfer to another part of procedure to implement proper actions. Per applicable procedure Att. 2, Step 3.2, applicant must recognize EDG 2 load is greater than 2250 KW and recall that MDFP is to be started (Initiating Cue). Att. 2 directs the applicant to Section 6.0. Applicant must evaluate the plant and recognize that MU/HPI cooling is established (ie, EDG 2 is loaded with a MU pump and HPI/LPI piggybacked), and that the EDG load must be reduced to allow the MDFP to be started without exceeding the 200 hr rating of 2946 KW. |
| g. RO/SRO: Monitor and Control CTMT Conditions | 1) Add JPM Step 9 to verify Containment Recirc Fans in operation. 2) JPM Step 11, add expected indications to Standard. 3) JPM Step 13, add expected indications to Standard. | 1) Added JPM Step 9 to verify CRFs in operation and renumbered. 2) Added expected indications to Standard. 3) Added expected indications to Standard. |
| h. RO/SRO: Shift From 4 to 2 CWPs | 1) Delete JPM Step 5 (redundant to Step 1). 2) Delete JPM Steps 6, 7, 8 (not performed as part of this procedure). 3) Combine JPM Steps 10 and 11 with JPM Step 9. 4) Combine JPM Steps 12,13, and 14. | 1) Deleted JPM Step 5 and re-numbered steps. 2) Deleted JPM Steps 6,7,8 and re-numbered steps. 3) Combined steps 9, 10, 11 (now JPM Step 5). 4) Combined steps 12, 13, and 14 (now JPM Step 6). |

| SCENARIOS | Comment: | Licensee Action: |
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| 2. | <p><u>Event 2: C-RO, SRO:</u> 1) As written, the failure does not appear to require any substantive BOP actions. Event 4 is a similar type event. As a minimum, recommend a DEAER Storage Tank level change that <u>requires</u> BOP to adjust level control valves, and implement a sense of urgency for the BOP to start the standby Condensate pump that failed to auto start.</p> | <p>1) Event was re-written to require a power decrease (reactivity event).</p> |
| 4. | <p><u>Event 1: I-RO, SRO-TS:</u> 1) Why does RO get credit? BOP takes all the actions.</p> | <p>1) Changed credit from RO to BOP.</p> <p>NOTE: Scenario not used.</p> |
| Spare | <p><u>Event 6: C-ALL:</u> 1) This event is part of the major transient (ref. Appendix D, C.2.e.): A major transient is one that has a significant effect on plant safety and leads to an automatic (or manual, if initiated by an operator) protective system actuation, such as a reactor trip or an engineered safety system actuation. A single major transient that actuates more than one automatic protective system actuation will be counted as a single major transient. Examples include loss of offsite power, LOCA, steam or feed line break, steam generator tube rupture, and loss of feedwater. A major transient should normally involve activation of the facility's emergency plan.</p> <p><u>Event 7: C-BOP:</u> 2) Cannot count this as component failure. It is part of the loss of feedwater, and makes no difference if the AFPT is started because it will trip later in the scenario.</p> <p><u>Event 8: C-ALL:</u> 3) Cannot count this as component failure. It is part of the loss of feedwater, and makes no difference if the MDFP is started because it will trip later in the scenario.</p> | <p>1) Event is Major, not Component, Failure.</p> <p>2) Event is Major, not Component, Failure.</p> <p>3) Event is Major, not Component, Failure.</p> <p>NOTE: Scenario not used.</p> |