

JPM#	1. Dyn (D/S)	2. LOD (1-5)	3. Attributes					4. Job Content Errors		5. U/E/S	6. Explanation (See below for instructions)
			IC Focus	Cues	Critical Steps	Scope (N/B)	Over-lap	Job-Link	Minutia		
RO (A1)	S	2								E S	<p>The "TASK" block should state "1290020301, Conduct of Shift Operations: Determine Current License Status." The "TASK STANDARD" block should read "At the completion of this JPM the applicant will have determined that he IS current in training, he CAN assume RO duties on Dec 31, and he CANNOT assume RO duties on Jan 1 due to not performing at least 5 12-hour shifts in the previous quarter." Response: That is not how the task is listed on Palo Verde's master task list. Changed the task Standard.</p> <p>NUREG-1021 App C.B.3 describes a task standard as the predetermined qualitative or quantitative outcome against which task performance will be measured. Therefore the task standard must define exactly what result must be achieved to pass the JPM. This is also how we determine what steps to designate as Critical Steps; if successful completion of a particular step is required to achieve the results of the task standard, then it is Critical. If you can still meet the task standard without successfully completing the step, then it is not Critical. Response: That is not how the task is listed on Palo Verde's master task list. Changed the task Standard.</p> <p>When referencing a procedure, include the procedure name as well as the reference (not just 40DP-9OP02). Need to ensure we have enough copies of 40DP-9OP02 in the classroom during administration. Response : Plan on using computers to access procedures and prints.</p> <p>Performance Step 2 Standard states "... requirements in the 2nd quarter..."; should state 3rd quarter. Response: Changed to 3rd quarter</p> <p>One of the Initial Conditions states "Attached is a spreadsheet of shifts you covered in the last quarter." It should say "... in this quarter" instead because it is Dec 27 and all the shifts listed are in Oct/Nov/Dec. Response: Changed to this quarter</p>
RO (A2)	S	3								E S	<p>Include name of 40OP-9ZZ16 in the cues. Response: Added name of 40OP-9ZZ16.</p> <p>See comments in A1 above regarding the Task Standard – it should read something similar to "applicant determines actual PZR level is xxx and RWT level will increase by xxx percent." Response: Changed the Task Standard</p>

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											<p>In the answer key, include the pages of 40OP-9ZZ16 appendices that the applicant will use, with graphs marked up and math shown. Response: Added appendices and marked up graphs.</p> <p>Improve the descriptiveness of the “standard” in step 3. I.e., actual initial volume in the RCS is [103400 gal]. Change in RCS volume is [9300 – 10140 gal]. etc. Response: Changed the descriptiveness as stated above.</p>
RO (A3)	S	2								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>Modify the Initiating Cue to read “The CRS has directed you to perform a Tech Review of Permit 12-0003 and identify any errors (Non-clerical – not typos) on the permit.” Response: Initiating Cue changed.</p>
RO (A4)	S	2								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>“Dosimetry” is misspelled several times as “dosemetry.” Response: Corrected spelling</p> <p>How does the applicant determine whether TASK-1 or TASK-2 is the appropriate choice? Response: Added cue that admin limits will not be exceeded.</p> <p>Provide a marked-up REP in the answer key. Response: Marked-up REP added in the answer key.</p>
SRO (A5)	S	2								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>All JPMs appear to have a comment allowing later revisions of the procedure to be used if verified appropriate ... the final exam submittal should specify which precise revision will be used. Response: This is our normal JPM format, but we will change it for the NRC exam and only include the latest revision.</p> <p>In the Initial Conditions, specify for the CO “One” 6-hour shift and “One” 10-hour shift. Response: Changed as stated.</p>

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SRO (A6)	S	2								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>Include a key with the JPM, and marked up graphs / tables from the procedures. Response: Included key and marked up pages</p>
SRO (A7)	S	2								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>Where is the minimum pressure for accumulator train operability listed? Response: Surveillance Test 73ST-9SG01 and 40OP-9SG01.</p> <p>The table provided in the Initiating Cue should be expanded to include Accumulator Train status for both trains and include data for all four MSIVs. With this information the applicant will have to determine operability of each MSIV at the time indicated. Response: Added all MSIVs to table.</p> <p>Would it add discriminatory value to add another portion to this question, asking something along the lines of "If no further action is taken, what is the latest time the plant is required to be in Mode 3 and still maintain compliance with TS?" Response: Changed JPM to determine time to be in Mode 2.</p>
SRO (A8)	S	3								E S	<p>See comments in A1 regarding the Task Standard. Response: Changed the Task Standard</p> <p>In the chart, the upper left corner box says "2010 Exposure" but this is a chart of 2011 exposure. Response: Changed to 2011</p> <p>Reference the applicable section of the procedure in the key for each of the answers. Response: Referenced applicable section of the procedure in the key</p> <p>Change the last initiating cue to "Determine which one of the above AOs will perform the task; provide justification for your selection." Response: Changed cue to read as stated above.</p>
SRO (A9)	S	3								E S	<p>Instead of having the evaluator provide cues in step 3, can the applicant be told to assume the STA concurs with your recommendation? Response: Changed cue to state "Assume the STA concurs with your E-Plan determination."</p>

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											<p>Need to provide completed form as a Key in the JPM, as well as a portion of the EAL chart. Response: Added completed form and EAL chart.</p> <p>Specify that the alert is HA1.2 in the task standard. Response: This is done in steps 2 and 3.</p> <p>Are there additional tasks that the EC is responsible for that the applicant might try to perform instead of the classification of the emergency? Response: No</p>

Instructions for Completing Matrix

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- Determine whether the task is dynamic (D) or static (S). A dynamic task is one that involves continuous monitoring and response to varying parameters. A static task is basically a system reconfiguration or realignment.
- Determine level of difficulty (LOD) using established 1-5 rating scale. Levels 1 and 5 represent inappropriate (low or high) discriminatory level for the license being tested.
- Check the appropriate box when an attribute weakness is identified:
 - The initiating cue is not sufficiently clear to ensure the operator understands the task and how to begin.
 - The JPM does not contain sufficient cues that are objective (not leading).
 - All critical steps (elements) have not been properly identified.
 - Scope of the task is either too narrow (N) or too broad (B).
 - Excessive overlap with other part of operating test or written examination.
- Check the appropriate box when a job content error is identified:
 - Topics not linked to job content (e.g., disguised task, not required in real job).
 - Task is trivial and without safety significance.
- Based on the reviewer's judgment, is the JPM as written (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory?
- Provide a brief description of any U or E rating in the explanation column.
- Save initial review comments as normal black text; indicate how comments were resolved using [blue text](#) so that each JPM used on the exam is reflected by a (S)atisfactory resolution on this form.

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			IC Focus	Cues	Critical Steps	Scope (N/B)	Over-lap	Job-Link	Minutia		
S1	S	2								S	<p>Performance Steps 2 and 3 should be critical if these are normally locked closed valves. It would be a critical step to direct repositioning by the area operator. Response: Changed to critical steps.</p> <p>Cue related to ZZ06 locks should be moved to applicable performance steps. Response: This permission would be granted ahead of the evolution and this should remain in the Cue.</p>
S2	D	3								U S	<p>NUREG 1021 App C.C.3 requires alternate path JPMs to be procedurally driven, meaning that there should be a contingency action that directs the operator how to proceed. This JPM does not meet that criteria because it requires the evaluator to cue the applicant on how to proceed. Response: Replaced this JPM. So further comments are N/A.</p> <p>JPM steps 7&8 – what is expected?</p> <p>Performance Step 2 Standard should read 40 gpm or less to match the procedure step.</p> <p>Add note for evaluator prior to Performance Step 17 to state that Step 17 will be a critical step if BAMP was stopped before transitioning to 103B</p>
S3	D	3								S	<p>For steps where the applicant is verifying or ensuring a certain valve position, describe what the expected position will be in the standards section. Response: The standards states that either the examinee verifies it closed/open or he opens/closes the valve.</p> <p>JPM step 7, is this step going to be performed? Response: This step will not be performed there this step may be marked N/A or may be circled. This is up to the performer.</p> <p>The Task Standard does not reflect the requirement to balance FWPT A&B parameters, but JPM step 11 is listed as a critical step. Response: Added “and parameters balanced with the other MFP.” To the task standard.</p> <p>Performance Step 4 should not be critical unless valve is expected to be found in the closed position. Response: Made step not critical</p>
S4	D	2								S	<p>There should be a cue in JPM step 8. Response: The operator can see this indication so there should be no cue given.</p> <p>Initial Conditions should contain an initial SIT level</p>

PVNGS-2012-03			DRAFT OPERATING TEST COMMENTS								CONTROL ROOM/IN-PLANT SYSTEMS JPMS									
JPM#	1. Dyn (D/S)	2. LOD (1-5)	3. Attributes					4. Job Content Errors		5. U/E/S	6. Explanation (See below for instructions)									
			IC Focus	Cues	Critical Steps	Scope (N/B)	Over-lap	Job-Link	Minutia											
											<p>Response: The operator can see the initial SIT level.</p> <p>Cue the operator the specific level to raise SIT to. Response: Added specific level to which to raise sit level.</p> <p>Steps that require valve manipulations by the AO that would prevent filling the SITs if not performed should be marked critical. Response: Made these steps critical.</p>									
S5	D	3								U S	<p>This is not an alternate path JPM, it is normal progression through alarm response. Response: Changed to non-alternate path JPM.</p> <p>Task Standard should just read “RMWT water added to RDT” Response: Changed Task Standard</p> <p>Steps that require valve manipulations by the AO that would prevent task completion if not performed should be marked critical. Response: Made these steps critical.</p>									
S6	D	3								E S	<p>Which step represents the alternate path? Response: Marked alternate path steps.</p> <p>Reference the actual procedure steps in the “steps” column of worksheet. JPM step 7 should be broken into several steps with separate standards. Response: Broke this step into several steps and put procedure step numbers in the steps.</p> <p>The standards for step 9 should be the actual action performed. Response: Changed the standard to the actual action performed.</p>									
S7	D	2								S										
S8	D	3								S	<p>Improve the TASK STANDARD – see comments in A1. Response: Changed the Task Standard</p> <p>Step 1 standard, include what RCS level must be. Response: Added what level must be.</p> <p>What is the reason for the last Initial Condition bullet (CS Pump B)? Response: Because CS has not yet been aligned for SDC. It is still in the Containment Spray lineup. Valves outside the control room are not aligned for SDC.</p> <p>Performance step 4 is critical. Response: Made step 4 critical</p>									

PVNGS-2012-03			DRAFT OPERATING TEST COMMENTS								CONTROL ROOM/IN-PLANT SYSTEMS JPMs	
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			IC Focus	Cues	Critical Steps	Scope (N/B)	Over-lap	Job-Link	Minutia			
P1	S	3								S	<p>Is there any guidance about opening the breaker before manually operating a MOV? Response: No, there is no requirement to open breaker.</p> <p>If an applicant elects to manually operate the valves instead of using local C/S does that satisfy the critical step? Response: No, they should do the left column and only use the right column as a contingency.</p> <p>Need a Terminating Cue. Response: Added a terminating cue.</p>	
P2	D	3								S	<p>Cue for performance step 5 does not appear correct unless opening one valve opens both. Response: Rewrote cue to make cue clearer. The examinee will only open one valve therefore the examiner must provide the cue as appropriate. There are two green lights per valve.</p>	
P3	D	3								U S	<p>In the TASK STANDARD, include the time limit. Response: Included time limit in Task Standard</p> <p>Include the procedure step in the “STEP” column. Response: Added step numbers.</p> <p>In JPM steps 8 and 9, where are these time limit derived from? Response: Time Critical Action Program procedure – 40DP-9ZZ04.</p> <p>What should amps be for the cue in step 9? Response: Added expected amps to cue.</p> <p>JPM cover sheet identifies JPM as Alternate Path, but is not listed as such on ES-301-2 Response: Will resubmit ES-301-2 and identify P3 as alternate path JPM.</p>	
											<p>General Comment: As written, there are not enough alternate path JPMs. Response: Changed JPM S-2. It is now alternate path and we meet the requirements for alternate path.</p>	

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7. Save initial review comments as normal black text; indicate how comments were resolved using **blue text** so that each JPM used on the exam is reflected by a (S)atisfactory resolution on this form.

PVNGS-2012-03										DRAFT OPERATING TEST COMMENTS	SCENARIOS
Scenario Set	1. ES	2. TS	3. Crit	4. IC	5. Pred	6. TL	7. L/C	8. Eff	9. U/E/S	10. Explanation (See below for instructions)	
1									S	<p>The "Applicant's Actions" column should include numbered procedural steps so that the examiner can more easily follow where the applicant is in the procedure. This can be done by placing the procedural step at the end of the statement, e.g. "[4.3.a]". If multiple steps are being condensed into one statement on the D-2, they need to be broken back down into their individual steps. Response: Added procedure step numbers</p> <p>Highlight, or otherwise draw attention to steps in which the CRS enters a TS. Do the same for steps that contain a CT. Response: Highlighted TS and CT steps</p> <p>It is our preference to have the D-2 arranged in chronological order, i.e. every step is listed sequentially with alternating performers as necessary, instead of grouping all the actions of a single performer in one block as currently written. Response: Rearranged into chronological order.</p>	
2									S	<p>Event 6 should contain a CT to start Stator Water Cooling Pump "A" before a turbine trip occurs, which would cause a reactor trip. Response: A turbine trip at Palo Verde does not cause a reactor trip.</p> <p>For all scenarios, include a statement at the bottom of each event describing when the evaluators may proceed to the next event. Response: Added statement at end of each event.</p> <p>For all scenarios, when stating that the crew receives an alarm on panel [xx], window [##], state what that alarm window reads, not just the window number. Response: Added alarm window titles</p> <p>Event 4, is the CRS entering LCO 3.3.7 COND A? Need to explicitly state that.' Response: Changed wording to "Enters LCO 3.3.7 COND A."</p> <p>Event 4, identify at what point the crew enters 40OP-9SA01. Response: Changed CRS and CO order so this is obvious.</p> <p>Event 5, what is "the established game plan"? This is either the Manuevering Game Plan or using STA worksheet. Added these words to the scenario.</p> <p>Page 13 should read "Event 9" vice "7&8." Response: Changed to event 9</p>	
3									S	<p>Event 5, need to explicitly state all the TS LCOs the CRS should enter (if the 3 that are</p>	

PVNGS-2012-03										DRAFT OPERATING TEST COMMENTS										SCENARIOS									
																				<p>listed are not all-inclusive). Response: Added all applicable LCOs.</p> <p>For all scenarios, need to include the actual steps of the SPTAs on the D-2, not just "CRS directs the crew to perform SPTAs." Some of the steps that are included as-written are just paraphrased general statements. NRC needs to be able to read on the D-2 exactly what the operators should be performing. Response: Included SPTA steps in all scenarios.</p> <p>Event 8 is not well identified on the D-2. Response: Added more info at start of event.</p>									
4										S										<p>Event 1, is there a procedure associate with this? Steps? Response: Added per 40OP-9SF05</p> <p>For all events we need to see the steps of the procedure that the applicant is performing, not just general statements. Response: Added steps</p> <p>Where are the actions associated with Event 9? Response: Table was pulled down over action. Fixed.</p> <p>There appear to be a lot of page breaks in the document which make it difficult to follow. Response: Fixed page breaks.</p> <p>Can the trip of DG "A" be programmed into the scenario instead of requiring an examiner cue? Response: No, it will take an examiner cue.</p>									

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- ES: ES-301 checklists 4, 5, & 6 satisfied.
- TS: Set includes SRO TS actions for each SRO, with required actions explicitly detailed.
- Crit: Each manipulation or evolution has explicit success criteria documented in Form ES-D-2.
- IC: Out of service equipment and other initial conditions reasonably consistent between scenarios and not predictive of scenario events and actions.
- Pred: Scenario sequence and other factors avoid predictability issues.
- TL: Time line constructed, including event and process triggered conditions, such that scenario can run without routine examiner cuing.
- L/C: Length and complexity for each scenario in the set is reasonable for the crew mix being examined, such that all applicants have reasonably similar exposure and events are needed for evaluation purposes.
- Eff: Sequence of events is reasonably efficient for examination purposes, especially with respect to long delays or interactions.
- Based on the reviewer's judgment, rate the scenario set as (U)nacceptable (requiring repair or replacement), in need of (E)ditorial enhancement, or (S)atisfactory.
- Provide a brief description of problem in the explanation column.
- Save initial review comments as normal black text; indicate how comments were resolved using [blue text](#) so that each JPM used on the exam is reflected by a (S)atisfactory

PVNGS-2012-03	DRAFT OPERATING TEST COMMENTS	SCENARIOS
resolution on this form.		