Millstone Unit 3 December 2013 Draft Exam Outline Review Comments

Millstone Letter to NRC comment-page 2 addresses letter to Bill Dean but at 475 Allendale Road *9/11/13-Licensee agreed to change*

Written Exam Outline Comments

All Site Specific K/A-Aside from plant specific priority, what K/A and importance ratings are selected? *9/11/13-Licensee acknowledged comment, agreed to try to locate K/A that match*

Site Specific: Severe Weather and Rapid Downpower-potential overlap with operating test scenario NRC-04? *9/11/13-Licensee agreed to evaluate against questions that are written*

9/11/13 Agreed to allow licensee re-sample for question 46, will re-sample another A2 due to overlapping question concepts for the system

RO Admin JPM Comments

RO A.1.1-no comment

RO A.1.2-is this a task that an RO would be expected to do? *Facility maintained that this is an RO task 9/11/13*
9/16/13-agree that this is a legitimate RO Admin

RO A.2-very low level, given simplistic nature of isolation; concept previously used on 2007/2009 exam. Component selected has no nuclear safety significance to misoperation; select a safety related component and increase complexity of task. *9/11/13-Licensee challenged adjusting JPM, will discuss further either to raise LOD of existing component or changing to different component.*
9/16/13-propose replacing with boric acid tagout that requires taking out both boric acid pumps to provide isolation of energy. Unsure if this tagout should be used, as unsure if applicants will move to isolate the pumps as well. Will look at it further to replace proposed tagout.

RO A.3-seems more like a Sim JPM than an Admin; does this JPM challenge the applicant administratively or does it purely consist of simulator manipulation? Does this overlap with Scenario NRC-01?
9/11/13 Licensee took challenge to ensure that this tests the administrative vs. sim operation aspect. Proposed potentially putting the incorrect setpoint and making recognition of incorrect setpoint as the critical task
9/16/13-currently proposing putting in incorrect data points and having RO recognize error. No procedural guidance for RO's to review these data points. Will evaluate further. Potentially will replace with evaluation of survey map/radiological conditions.

SRO Admin JPM Comments

SRO A.1.1-unable to say if this is challenging enough without seeing their round sheets. If the round data specs and TS references are right on the round sheets, this is not much more than a DLU. K/A match? Appears to match several Equipment Control K/A

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9/11/13 Licensee challenged DLU, should require in-depth knowledge. Researching possible past use of this type of JPM in the Conduct of Operations category.
9/16/13-propose replacing this JPM with reviewing a reactivity calculation with introduced errors

SRO A.1.2-no comment

SRO A.2-no comment

SRO A.3-different enough from SRO A.1.1? Similar concept. K/A match? K/A appears to test log review and equipment operability, not radiation control and radiation or contamination hazards. Recommend replacing JPM. *9/11/13-Licensee maintains that it is different enough from SRO A.1.1, title of JPM on outline is misleading. Accepted challenge on K/A match, maintains that it meets K/A. Will continue review when draft is received.*
9/16/13-will review if procedures direct declaring rad monitor per a specific TS or if applicant has to determine TS and make inop call.

SRO A.4-no comment

Simulator Job Performance Measure Comments

ES-301-2 SRO-U S.4 typo 'Inventoy' vs. 'inventory' *9/11/13-Licensee accepted comment*

Remove 'E' classification from Sim JPMs on both RO and SRO-U outlines, as 'E' attribute only applies to in-plant JPMs *9/11/13-Licensee accepted comment*

S.1-no comment

S.2-Does this meet alternate path criteria? What action is taken in response to lineup as found? Currently, applicant recognizes incorrect lineup, reports it, and JPM is complete. Needs action to correct the condition.
9/11/13-Licensee accepted comment, will work to complete alternate path
9/16/13-applicant will have to report CIA failure, and determine valves need to be repositioned, and reposition the required valves.

S.3-What is the alternate path? RHR pumps or valve stroke? *9/11/13-Licensee states that operators have to reset safety system, trip pumps, start RSS pumps, etc. Valve stroke is not critical*
9/16/13-~5 min to trip pumps, ~25 min to line up for recirc, licensee states should be approximately ~17 min, historically 22 min validation

S.4-no comment

S.5-no comment
9/16/13-licensee states original JPM conditions difficult to reproduce adequate control. Will adjust conditions, cues to ensure respectable cooldown rate with good control

S.6-missing EPE number (055?) *9/11/13-Licensee accepted comment*

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S.7-no comment

S.8-Knowledge of control room evacuation tests safety function 8, per ES-401-2, page 23. Replace S.8, since both S.7 and S.8 are testing the same safety function
9/11/13-Licensee accepted comment, took previous submittal at face value, did not validate correct safety function per ES-401-2. Will evaluate replacing or justifying current selection
9/16/13-proposing replacing JPM with a JPM using safety function 5. 2011 exam as reference, going to be high containment pressure with failure of containment spray. Bank JPM, will also gain an alternate path using this.

In-Plant Job Performance Measure Comments:

P.1-no comment

P.2-does this meet the definition of alternate path?
9/11/13-Licensee accepts comment, will evaluate

P.3-no comment

Scenario Comments

Scenario NRC-01:

- Event 1-by itself is low LOD, recommend raising LOD by adding EDG out of service as part of turnover (TS 3.8.1.1 B, 2 hour action statement) *9/11/13-Licensee accepted comment*
- Event 2-Would this also be a BOP credited event due to tripping bistables? (depending on location) *9/11/13-Licensee states I&C actually trips bistables, no BOP credit*
- Critical Task 2-Need more information as far as what charging components are out of alignment, timeline for response, and consequences for failing to perform the actions. With an SGTR, how is this critical without a challenge to containment? *9/11/13-Licensee accepted comment*
- Critical Task 3-Timelines, metrics, pass/fail criteria? *9/11/13-Licensee accepted comment*
- Move Event 9 and incorporate with Event 5, as Event 9 is part of the major and a setup item *9/11/13-Licensee accepted comment*

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Scenario NRC-02:

- Event 1-same comment as NRC-01 Event 2. BOP credit for bistables? *9/11/13-Same as NRC-01 event 1, I&C trips bistables, no BOP credit*
- Remove comma after 'newly discovered' in first paragraph of exam overview and turnover *9/11/13-Licensee accepted comment*
- RCP oil leak downpower mis-classified as 'Normal' for BOP. Should be R or C.
- Event 3 RCP oil leak cannot be counted as both R and C. Choose one. *9/11/13-Licensee agreed to add in additional malfunction such as vibes to clearly separate the downpower, and then removing the pump for service, to allow credit as two events.*
- Event 6 already exercised in NRC-01. Additionally, there are 4 malfunctions after EOP entry. Incorporate Event 6 with Major. *9/11/13-Licensee recognizes some duplication; can still be critical task without taking credit for the malfunction*
- What are the consequences to the public for failure to manually initiate SI? *9/11/13-Licensee will potentially remove this as a critical task since plant may not reach shutoff head of SI pumps*
- Critical Task 3-consequences for failure to isolate CCW valves out of position? *9/11/13-Licensee recommends keeping due to adhering to Westinghouse guidance for ensuring containment isolation*
- Scenario termination criteria should be changed to following SI termination *9/11/13-Licensee accepted comment*

In-Plant

JPM P.1-No comments

JPM P.2-Cue is too leading to direct checking 3MSS*MSV5. Applicant would get there by just saying that the TDAFW has tripped, investigate.

Recommend adding in guidance after pump discharge valve is opened to give examiner latitude to end JPM at their discretion; all further steps verify position only and are non-critical

JPM P.3-No comments

Admin

RO A.1.1- More steps should be critical since all calculations influence the next step. There is currently only *one* critical step in the JPM

RO A.1.2-Missing > and < signs in step b. and c. of Step #1.

RO A.2-Student handout should be pre-filled out, ready to be given to applicants (filled out on their hard copy submittal).

RO A.3-Appears low LOD with minimal applicant operations. Recommend replacement

SRO A.1.1-Same as RO A.1.1 comment.

SRO A.1.2-3665.2-001 should be pre-filled out, ready to be given to applicants (filled out on their hard copy submittal).

SRO A.2-Typo step 5 'performing its intended'

Typo step 8 'will not be restored'

SRO A.3-No comments

SRO A.4-It appears, based upon the handouts, that the applicant is told from the beginning that a PAR is required. This immediately alerts the applicant that the EAL call will be a GE and all others can be disregarded. These need to be two discrete cues.

Simulator

S.1-No comments

S.2-If CIA pushbutton in Step #2 does not cause a proper CIA, should not be critical

SRO follow-up question is not critical, should be removed.

S.3-No comments

S.4-No comments

S.5-No comments

S.6-No comments

S.7-No comments

S.8-No comments

Scenarios

NRC-01- Comment from outline not addressed as requested. Draft exam has operators make simple AFW pump operability call on lack of oil. Recommend remove altogether, or that scenario initial conditions have EDG OOS then have some event that requires some board action (such as spurious TDAFW start) that requires a TS call.

NRC-02-No comments

NRC-03-No comments

NRC-04-Typo page 19 in floor instructor column 'If the feg valves'