

Vogtle PEmails

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Subject: 4/21/2016 Public Meeting handout - Draft RAI regarding Vogtle Exemption JPMs
Attachments: 2016-04-21 Draft RAI regarding Vogtle Exemption JPMs.docx

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Draft RAI regarding Vogtle Exemption Walkthrough Job Performance Measures (JPMs)

**Public Meeting Discussion
April 21, 2016**

Regulatory Basis:

10 CFR 55.40(a) states, "The Commission shall use the criteria in NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," in effect six months before the examination date to prepare the written examinations required by §§ 55.41 and 55.43 and the operating tests required by § 55.45. The Commission shall also use the criteria in NUREG-1021 to evaluate the written examinations and operating tests prepared by power reactor facility licensees pursuant to paragraph (b) of this section." NUREG-1021, Revision 10, Appendix A, "Overview of Generic Examination Concepts," Section C.1.b (last paragraph), describes the concept of content validity as it relates to operator licensing examinations and states in part, "The initial examination, on the other hand, covers all instruction related to safety-significant K/As that either were or should have been taught during the training program. The examination standards ensure that the K/As are sampled in a relatively uniform process that would likely include content and instruction that occurred from the beginning to the end of the program and not be focused upon any particular segment of instruction."

Additionally, NUREG-1021, ES-301, "Preparing Initial Operating Tests," Sections D.4.a and D.4.b, provide direction to select systems from the nine safety function groupings in the K/A catalog (i.e., NUREG-2103, "Knowledge and Abilities Catalog for Nuclear Power Plant Operators, Pressurized Water Reactors, Westinghouse AP1000" for the AP1000), and for each system selected, to select a task for which a JPM exists or can be developed.

Questions:

1. Enclosure 2, Section 1.3, "Task List," of the submittal dated April 15, 2016 (ADAMS Accession No. ML16109A013), says, "Tasks with DIF [difficulty, importance, and frequency ratings greater than 2.5 were then screened for their suitability for evaluation using the Cold Licensing alternate methods. Most of these tasks were determined to be suitable for evaluation using the Cold Licensing alternate methods. Some were not. The reason some tasks were unsuitable was because no procedure had, as yet, been developed to support performing these tasks. This is important because without a procedure, a task can neither be performed nor evaluated. SNC evaluated the set of tasks having procedures and determined that the total number was adequate to meet the validity and reliability criteria set forth in NUREG-1021, Appendix A."
 - a. Please list the safety function(s) from NUREG-2103, Section 1.9.1, "Plant System Organization by Safety Function," associated with each task in Enclosure 2, Table E-2, "In-Plant Task List." If any safety function is not represented on the list, describe any impact on content validity.
 - b. The submittal indicates that some tasks do not yet have procedures available, but others seem to have been excluded for other reasons. Please provide additional information as to (1) why procedures are not available and (2) why some tasks were otherwise unsuitable.
 - c. Please identify the "validity and reliability criteria" that SNC determined were satisfied, and please describe how SNC determined this.
2. Enclosure 2, Page 5/14, states, "SNC determined that the number of tasks that was left following this screening process was sufficient to preclude predictability and that no applicant would be able to predict what task would appear on an exam." Please explain the basis for the conclusion.
3. Enclosure 2, Page 8/14, states, "Utilizing cold licensing evaluation methods during the administration of in-plant walkthrough JPMs should not, and does not, alter the method in which JPMs are selected or sampled." Please describe how sampling will be performed.
4. Enclosure 2, Page 8/14, states, "Additionally, for each of the three tasks selected for the in-plant portion of the examination, the incorporation of alternate paths during development of the three corresponding JPMs (either "faulted" or not "faulted") will elevate cognitive levels." Please clarify if the intent is for all three in-plant systems JPMs to be alternate path JPMs.