



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

May 31, 2016

Mr. Dennis Koehl
President and Chief Executive Officer
STP Nuclear Operating Company
P.O. Box 289
Wadsworth, TX 77483

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1 AND 2,
NRC RETAKE EXAMINATION REPORT 05000498/2016301; 05000499/2016301

Dear Mr. Koehl:

On May 4, 2016, the U.S. Nuclear Regulatory Commission (NRC) completed an initial operator license retake examination at the South Texas Project Electric Generating Station. The enclosed report documents the examination results and licensing decisions. A telephonic exit meeting was conducted on May 16, 2016, with Mr. G. Janak, Training Manager, Operations, who was also provided with the NRC licensing decisions.

The examination included the evaluation of two applicants for reactor operator licenses and one applicant for an upgrade senior reactor operator license. The license examiners determined that all three of the applicants satisfied the requirements of 10 CFR Part 55 and the appropriate licenses have been issued. There were three post-examination comments submitted by your staff. Enclosure 1 contains details of this report and Enclosure 2 summarizes post-examination comment resolution.

No findings were identified during this examination.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's

D. Koehl

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Sincerely,

/RA/

Vincent G. Gaddy, Chief
Operations Branch
Division of Reactor Safety

Docket Nos. 50-498 and 50-499
License Nos. NPF-76 and NPF-80

Enclosures:

1. Examination Report 05000498/2016301;
05000499/2016301 w/Attachment:
Supplemental Information
2. NRC Review of South Texas Project
Written Post-Examination Comments

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D. Koehl

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DATE	5/17/16	5/31/16	5/31/16					

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Letter to Dennis Koehl from Vincent G. Gaddy, dated May 31, 2016

SUBJECT: SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION, UNITS 1 AND 2,
NRC RETAKE EXAMINATION REPORT 05000498/2016301; 05000499/2016301

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Team Leader, DRS/IPAT (Thomas.Hipschman@nrc.gov)
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U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Dockets: 05000498, 05000499

Licenses: NPF-76, NPF-80

Report: 05000498/2016301; 05000499/2016301

Licensee: STP Nuclear Operating Company

Facility: South Texas Project Electric Generating Station, Units 1 and 2

Location: FM 521 - 8 miles west of Wadsworth
Wadsworth, Texas 77483

Dates: March 7 - May 16, 2016

Inspectors: K. Clayton, Chief Examiner, Senior Operations Engineer

Approved By: Vincent G. Gaddy
Chief, Operations Branch
Division of Reactor Safety

SUMMARY

ER 05000498/2016301; 05000499/2016301; 03/07/2016 - 05/16/2016; South Texas Project Electric Generating Station; Retake Initial Operator Licensing Examination Report.

NRC examiners evaluated the competency of two applicants for reactor operator licenses and one applicant for an upgrade senior reactor operator license at the South Texas Project Electric Generating Station.

The licensee and the NRC developed the examinations using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 10. The written examination was administered by the licensee on May 4, 2016. The operating test was waived because the three applicants had previously passed an operating test in September of 2015.

The examiners determined that all three of the applicants satisfied the requirements of 10 CFR Part 55 and the appropriate licenses have been issued.

A. NRC-Identified and Self-Revealing Findings

None

B. Licensee-Identified Violations

None

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities (Initial Operator License Examination)

.1 License Applications

a. Scope

The NRC examiners reviewed all license applications submitted to ensure each applicant satisfied relevant license eligibility requirements. Examiners also reviewed all three of the license applications to confirm that they accurately reflected the subject applicant's qualifications. This audit focused on the applicant's experience and on-the-job training, control manipulations, remediation plans, and weekly assessments that were done because of weaknesses identified on the previously failed written examinations in September of 2015.

b. Findings

No findings were identified.

.2 Examination Development

a. Scope

The NRC examiners reviewed integrated examination outlines and draft examinations submitted by the licensee against the requirements of NUREG-1021. The operating test was waived for these three applicants because all three passed the operating test portion of the NRC examination administered in September of 2015 at South Texas Project.

b. Findings

No findings were identified.

c. Other Observations

The NRC examiners provided outline, draft examination, and post-validation comments to the licensee. The licensee satisfactorily completed comment resolution prior to examination administration.

The NRC examiners determined the written examinations initially submitted by the licensee were not within the range of acceptability expected for a proposed examination. The NUREG-1021 standard for an unsatisfactory submittal requires that 20 percent or more of the written examination questions must be classified as unsatisfactory based on criteria in Section ES-401 and this criterion applies for the reactor operator portion, the senior reactor operator portion, or both. However, because this was the first submittal

for a new exam development team at South Texas Project, the submittal is considered satisfactory as long as all comments are resolved prior to administration (as discussed on page 10 of Section ES-501 of NUREG-1021). All future exam submittals that are unsatisfactory may be rescheduled or cancelled as directed in NUREG-1021. It also requires that all "future submittals should incorporate any lessons learned from this effort." The licensee wrote Condition Report CR-2016-5726 to address these issues.

.3 Operator Knowledge and Performance

a. Scope

On May 4, 2016, the licensee proctored the administration of the retake written examinations to the three applicants. The licensee staff graded the written examinations, analyzed the results, and presented their analysis to the NRC on May 9, 2016.

b. Findings

No findings were identified.

All three applicants passed the written retake examination. The final written examinations and the post-examination analysis and comments may be accessed in the ADAMS system under the accession numbers noted in Enclosure 2. The licensee requested and received approval by the NRC to withhold the written examinations from the public document room for 2 years.

The licensee noted the following generic weaknesses during the written examination reviews with the applicants:

1. Component cooling water (CCW) alarm set points (Q21)
2. Interface between the reactor coolant pumps and CCW (Q31)
3. Activation of emergency communications systems (Q34)
4. Emergency procedure step reasons/bases for a tube rupture event (Q35)
5. Normal and emergency trips for an emergency diesel generator (Q43)
6. Fuel handling building radiation monitors (Q44)
7. Rod worth versus reactor coolant parameters (Q51)
8. Cooling water pH/boron during loss of coolant accident (Q57)
9. Procedure usage and transitions for steam line rupture (Q77)
10. Emergency procedure hierarchy with critical safety functions (Q80)
11. Technical Specification requirements for nuclear instruments (Q81)
12. Procedure usage and transitions for anticipated transient without trip (Q87)

The licensee wrote Condition Report CR-2016-6611 to address all written examination generic weaknesses.

Also, there were two procedures that may need enhancements for clarity based on interpretation issues identified during this process. The first procedure that may need an enhancement was identified during the "free review" period for a written question on control room evacuation. For Off-Normal Procedure OPOP04-ZO-0001, "Control Room Evacuation," Revision 39, the procedure depends on an interlock between the main turbine and the reactor to trip the main turbine when evacuating the control room instead of ensuring that both are tripped prior to exiting the control room. The licensee is evaluating this procedure with Condition Report CR-2016-6505. The second procedure that may need enhancement was discovered prior to the exam by a licensed operator crew and during the post-exam review process. For Off-Normal Procedure OPOP04-CR-0001, "Loss of Condenser Vacuum," Revision 22, step 6, is confusing and overly complex. This is based on 1) licensed crew performance with this procedure at this step, 2) the written exam author for this retake examination, and 3) the chief examiner during exam reviews. Each example involves the decision of when to perform a rapid load reduction versus performing an immediate reactor/turbine trip. The licensee is evaluating this procedure with Condition Report CR-2016-6463.

Additionally, the licensee submitted three post-examination comments (Q36, Q63, and Q90) that required review and disposition by the chief examiner. The Region IV Operations Branch Chief assigned a panel of examiners that were not part of the examination team effort at South Texas Project to review the question challenges. The panel reviewed the questions and recommended accepting all three post exam comments and requested key changes by the licensee. The chief examiner and Region IV Operations Branch Chief agreed with the panel's recommendations. As a result of the panel's recommendations, one additional applicant passed the written examination. More details are included in Enclosure 2 of this report and the entire licensee's post-examination comments and analysis can be found in ADAMS using Accession Number ML16138A092. Copies of all individual examination reports were sent to the facility training manager for evaluation and determination of appropriate remedial training. The licensee also submitted one comment with a request to consider question 27 as an SRO-only question for future exams. This question and NRC resolution are in Enclosure 2 of this report.

.4 Simulation Facility Performance

a. Scope

The simulator was not used for this examination.

b. Findings

No findings were identified.

.5 Examination Security

a. Scope

The NRC examiners reviewed examination security for examination development and examination administration week for compliance with 10 CFR 55.49 and NUREG-1021.

b. Findings/Observations

No findings were identified.

4OA6 Meetings, Including Exit

Exit Meeting Summary

The chief examiner presented the license decisions and examination results to Mr. G. Janak, Training Manager, Operations, and other members of the staff on May 16, 2016.

The licensee did not identify any information or materials used during the examination as proprietary.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

G. Janak, Training Manager, Operations
T. Hurley, Supervisor, Simulator Support
S. Mason, SRO-Licensed Training Instructor
M. Ripple, SRO-Licensed Training Instructor

NRC Personnel

A. Sanchez, Senior Resident Inspector
N. Hernandez, Resident Inspector

ADAMS DOCUMENTS REFERENCED

Accession No. ML16138A090 - FINAL WRITTEN EXAMS (delayed release May 16, 2018)

Accession No. ML16138A092 - POST EXAMINATION ANALYSIS (AND COMMENTS)

NRC Review of South Texas Project Electric Generating Station Written Post-Examination Comments

Note: A complete text of the licensee's post-examination analysis and comments can be found in ADAMS under Accession Number ML16138A092.

The NRC Region IV Operations Branch Chief established a panel of three examiners that had no involvement in any part of the examination process for this examination at South Texas Project to review the three post examination comments (Q36, Q63, and Q90) submitted by the licensee. The NRC resolution section below is a summary of the panel conclusions. The Region IV Operations Branch Chief and the chief examiner accepted the panel's recommendations.

Question 36

During a control room evacuation due to a fire, in accordance with 0POP04-ZO-0001, Control Room Evacuation, why is the Reactor/Main Turbine tripped before leaving the control room?

Because of...

- A. a loss of Main Feedwater
 - B. a loss of EHC control to the Main Turbine
 - C. the lack of control functions available at the Auxiliary Shutdown Panel
 - D. the possibility of spurious operation or unavailability of supporting equipment
- Original Keyed answer: D

Licensee Comments for Question 36:

This question was written using the basis of 0POP04-ZO-0001, Control Room Evacuation, Addendum 23. Page 1 of the basis section discusses the overall procedure and its strategy. It states in the final paragraph on page 1; "Evacuation of the Control Room due to a fire requires actions that are unique to the existing conditions due to the possibility of spurious operation or unavailability of specific components. When the evacuation is required due to a condition that does not involve fire, such as toxic gas or high radiation levels, there is no reason to assume that any safety related equipment may spuriously operate or become unavailable." Therefore 'D' is a correct answer.

During the exam review, all three applicants stated that the basis supported 'C' being a correct answer.

In reviewing the question, the basis on page 4 for tripping the Reactor/Main Turbine states: "The operator trips the reactor. The RNO directs the operator to open the reactor trip breakers. Remote reactor trip capability is not available at the ASP. Thus, the reactor should be tripped prior to Control Room evacuation." Therefore 'C' is also a correct answer because tripping the Reactor/Main Turbine is a control function not available at the ASP.

Based on the newly discovered technical information that supports a change in the answer key, both 'C' and 'D' are correct for tripping the Reactor/Main Turbine before leaving the Control Room for a fire in the control room. STP recommends accepting both 'C' and 'D' as correct answers.

Licensee Recommendation: Accept both 'C' and 'D' as correct.

(ES-403, D.1.b, 3rd bullet)

NRC Resolution of Question 36:

The NRC regional office formed a panel to review the three question challenges (Q36, Q63, and Q90). For this question (Q36) the panel recommended to accept the licensee's recommendation to accept either 'C' or 'D' as correct answers based on the new information provided after the exam was administered because it meets the guidance in NUREG-1021, ES-403, page 3, bullet 3, for newly discovered technical information. The applicants pointed out during exam review that further down in this procedure (i.e., page 4 versus page 1) it contains the information that validates distracter 'C' as a second correct answer. Therefore, the chief examiner and regional branch chief agreed with the panel recommendations to accept either 'C' or 'D' as correct answers because of this new technical information.

Question 63

The Unit is at 75% power with the following conditions:

- Control Bank 'D' is at 230 steps.
- Rod Control is in Auto.

Subsequently:

- Power Range Channel N42 fails high.

What effect will this failure have on the Rod Control system?

Control Bank 'D' will step...

- A. OUT until stopped by C-11 (248 steps).
- B. IN until the RO places Rod Control in Manual.
- C. OUT until Tave and Tref are matched.
- D. IN until no change is occurring between turbine and reactor power.

Original Keyed answer: D

Licensee Comments for Question 63:

This question was written based on the system lesson plan for the Rod Control system. If there was no operator action Control Rod Bank 'D' will step in only as N42 failed high to try to lower what the system believes is a high reactor power. When there is no change between Reactor power and turbine power then the control rods will stop. Therefore 'D' is a correct answer.

During the exam review, SRO1 and RO1 both stated that they chose Answer 'B' based on the immediate action steps of the abnormal procedure, 0POP04-NI-0001, Nuclear Instrument Malfunction.

In reviewing this question and with the given failure of Power Range Channel N42 failing high, the operator would be required to perform the immediate action of abnormal procedure 0POP04-NI-0001, Nuclear Instrument Malfunction, which is to 'ENSURE "ROD BANK SELECTOR SW" in MAN.' This action will stop control rod movement and could happen before there is no mismatch between turbine and reactor power due to it being an immediate action. Therefore, with the question as written, 'B' is also a correct answer.

Based on the newly discovered technical information that supports a change in the answer key and looking at Answers 'B' and 'D' independently, they are both correct answers for the given condition. STP recommends accepting both 'B' and 'D' as correct answers.

Licensee Recommendation: Accept 'B' or 'D' as correct.

(ES-403, D.1.b, 3rd bullet)

NRC Resolution of Question 63:

The NRC regional office formed a panel to review the three question challenges (Q36, Q63, and Q90). For this question (Q63) the panel recommended to accept the licensee's recommendation to accept either 'B' or 'D' as correct answers based on a flawed stem that did not state "without any manual operator actions." The panel recommendation to accept both of these as correct is based on the guidance in NUREG-1021, ES-403, page 3, bullet 1, for an unclear stem that was missing the necessary information to exclude the manual action contained in distracter 'B.' This is for a different reason than new information that the licensee requested (bullet 3 versus bullet 1 of the ES-403 guidance) but still has the same outcome. Therefore, the chief examiner and regional branch chief agreed with the panel recommendations to accept either the original keyed answer 'D' or distracter 'B' as correct answers with the flawed stem.

Question 90

The Unit is at 100% power with the following conditions:

- Main Condenser vacuum is 23.7" HG and slowly lowering.

The low Main Condenser vacuum would be caused by a _____ (1) _____ and the Unit Supervisor would direct _____ (2) _____.

	(1)	(2)
A.	Condensate Pump trip and failure of the standby pump to start	a fast load reduction per 0POP04-CD-0001, Loss of Condensate Flow

B.	Condensate Pump trip and failure of the standby pump to start	the immediate actions of 0POP05-EO-EO00, Reactor Trip or Safety Injection
C.	Condenser Air Removal Pump trip and failure of the standby pumps to start	a fast load reduction per 0POP04-CR-0001, Loss of Condenser Vacuum
D.	Condenser Air Removal Pump trip and failure of the standby pumps to start	the immediate actions of 0POP05-EO-EO00, Reactor Trip or Safety Injection

Original Keyed answer: C

Licensee Comments for Question 90:

This question was based on actions taken in procedure 0POP04-CR-0001, Loss of Condenser Vacuum. For most of the life of the Units at STP, operators have been trained through 0POP04-CR-0001, Loss of Condenser Vacuum, to reduce Main Turbine load to help restore condenser vacuum for a condenser vacuum leak. This would make 'C' the correct answer.

During the exam review SRO1 stated that he answered the question by choosing Answer 'D' because it is the correct flow path of the procedure.

In reviewing this question, it was discovered that a condition report, CR 16-4923, was written because during a Crew Performance Evaluation a crew performed a fast load reduction in the simulator for a similar condition as stated in this question when in actuality the procedure, 0POP04-CR-0001, Loss of Condenser Vacuum, did not call for a fast load reduction. In 2014 the procedure was revised following main turbine repairs. During a loss of vacuum due to air in leakage, down-powering the unit is not desirable because it brings the unit toward the restricted zone for turbine operation. A fast load reduction is only required if the unit is in the restricted zone per Addendum 2 of the procedure. In the question given with the unit at 100% power, the unit would be outside the restricted zone. Therefore 'C' cannot be the correct answer.

With the trend given in the stem of the question for condenser vacuum at 23.7" HG and slowly lowering, the procedure puts the unit in a loop at step 10 until condenser vacuum reaches 21" HG. When condenser vacuum reaches 21" HG, then at step 9 RNO the operator is to 'ENSURE Reactor is tripped, ENSURE Main Turbine is tripped and GO TO 0POP05-EO-EO00, Reactor Trip or Safety Injection.' Therefore the correct answer is 'D'.

During further review it was noted that Condition Report CR 16-4923 states the following: Conduct the performance analysis to determine appropriate course to address the following observation: During a recent simulator scenario and after limited polling of operators there is a mindset that during a loss of condenser vacuum events it is desirable to reduce turbine loading to mitigate the event. This is contrary to the direction provided in procedure 0POP04-CR-0001.

A Performance Analysis was performed and a gap was identified and training will be required. The specifics of the training will be identified by a Training Analysis which is currently in progress. Based on the newly discovered technical information that supports a change in the

answer key, answer 'D' is the correct answer. STP recommends the keyed answer be changed to 'D'.

Licensee Recommendation: Change keyed answer to 'D'.

(ES-403, D.1.b, 3rd bullet)

NRC Resolution of Question 90:

The NRC regional office formed a panel to review the three question challenges (Q36, Q63, and Q90). For this question (Q90) the panel recommended to accept the licensee's recommendation to change the keyed answer to 'D' based on the new information provided after the exam was administered because it meets the guidance in NUREG-1021, ES-403, page 3, bullet 3, for newly discovered technical information. The licensee repaired the main turbine in 2014 and made corresponding design changes to procedures and training but this information was not correctly implemented in procedure content and/or training, as indicated in the condition report listed in the exam report, and is currently under review by the licensee for corrective actions. A recent requalification crew also attempted a fast load reduction for this event as mentioned above in the body of the report and the exam author also thought this was the correct choice as reflected in the original keyed answer, however the initial applicant selected the actual correct answer to trip immediately based on this newer design of the main turbine. Because the new technical information to trip the reactor and main turbine for these conditions with low vacuum, the chief examiner and regional branch chief agreed with the panel recommendations to change the keyed answer to 'D' from 'C' because of this new technical information and are waiting on licensee inputs for final disposition of the procedure and training issues. The two corresponding procedure/concept issues are being addressed with the vendor and the procedure writing group at STP with Condition Report CR-2016-6463.

Question 27

Which of the following is the entry condition listed in OPOP04-AE-0005, Offsite Power System Degraded Voltage?

(1) Switchyard Bus voltage indicating (2) when in a normal electrical lineup.

- | | |
|------------------------|--------------|
| A. (1) North OR South | (2) < 339 KV |
| B. (1) North OR South | (2) < 356 KV |
| C. (1) North AND South | (2) < 339 KV |
| D. (1) North AND South | (2) < 356 KV |

Answer: C (1) North AND South - (2) < 339 KV

Licensee Comments for Question 27:

One candidate chose distracter 'A' while the other two candidates chose distracter 'B' but the correct answer was 'C.' This question was written based on the entry conditions for OPOP04-AE-0005, Offsite Power System Degraded Voltage. Simply stated the correct answer is 'C.' All 3 applicants missed this question in addition to 3 out of 4 licensed operators during validation of the question. The one licensed operator that got this question right was an SRO on shift because he had to enter the procedure the week before this validation effort was done. In reviewing the question we looked at validation comments and the STP Owner Communication Plan. Validation comments indicated that only SROs perform this procedure and when performing the procedure they get a peer check from other SROs. The STP Owner Communication Plan states that the electrical transmission distribution representatives will contact the Shift Manager (SRO) to provide information on the status of the transmission grid, such as current electrical voltage. Nowhere in the STP Owner Communication Plan does the RO get involved with these communications. Based on this review it was determined that the entry conditions for OPOP04-AE-0005, Offsite Power System Degraded Voltage, are more complex than other AOP entry conditions. In addition, an SRO is responsible for the actions of this procedure and the question cannot be answered solely on fundamental knowledge of the entry conditions for OPOP04-AE-0005, Offsite Power System Degraded Voltage. This question validated as an SRO question and the question is not linked to RO requirements. Even though the question is technically correct, STP recommends that the NRC review this question for an exception to the NUREG 1021 SRO versus RO question requirements.

NRC Resolution of Question 27:

Although this question was not challenged for a key change, the licensee submitted comments and requested a response per NUREG-1021, ES-501, page 11. After consulting with NRR, the conclusion the NRC regional office made is that this question has a KA value of 3.2 for the RO applicant, is specifically mentioned in the SRO-only guidance in NUREG-1021 as RO knowledge because these entry conditions are the first steps for this procedure and also meets the intent of the corresponding KA statement from the KA catalog "Ability to determine and interpret the following as they apply to Generator Voltage and Electric Grid Disturbances: Operational status of offsite circuit." The NRC believes that it is reasonable to expect ROs to know this knowledge. The fact that almost everyone who saw the question missed it appears to point to a training issue. If there is a complex evaluation and communication plan needed to enter this Off-Normal procedure at South Texas Project, then this procedure should be edited to make this clearer and exclude the RO entry condition aspect of the current guidance. If STP considers modifying the procedure to meet these conditions then they should also incorporate an SRO-only learning objective for this KA in the training program. Additionally, if there are any alarm windows for these degraded voltage conditions that ROs would be expected to respond to then it may be hard to exclude this knowledge from their required skill sets for control board operations.