I reviewed the operating test outline for Clinton Power Station (CPS) and had 1 comment, which was:

> Simulator JPM d. references K/A 223001 A2.01 (*Primary Containment Systems and Auxiliaries),* but the description is “Place FW Leakage Control in Service.” This initially didn’t make sense but when discussed with the exam author, it was explained and adequately documented in the K/A justification follow-up. It was noted that this JPM also has appeared on the last 2 NRC exams (“**P**”). Based on the verbal explanation and the K/A justification documentation **below**, the outline review is complete.

K/A Justification

A2. Ability to (a) predict the impacts of the following on the PRIMARY CONTAINMENT SYSTEM AND AUXILIARIES ; and

(b) based on those predictions, use procedures to correct, control, or mitigate the consequences of those abnormal conditions or operations:

A2.01 Loss of coolant accident 4.3* 4.4*

The Feedwater Leakage Control System is addressed by ITS 3.6.1.9 (Containment Systems / Feedwater Leakage Control System (FWLCS)).

Per B3.6.1.9, following a DBA LOCA, the FWLCS supplements the isolation function of primary containment isolation valves (PCIVs) in the feedwater lines which also penetrate the secondary containment. These penetrations are sealed by water from the FWLCS to prevent fission products (post-LOCA containment atmosphere) from leaking past the isolation valves and bypassing the secondary containment after a Design Basis Accident (DBA) loss of coolant accident (LOCA).

The FWLCS consists of two independent, manually initiated subsystems. Each subsystem uses its connected train of the residual heat removal (RHR) system and a header to provide sealing water for pressurizing the feedwater piping either between the inboard and outboard containment isolation check valves or between the outboard containment isolation check valve and the outboard motor-operated gate valve.

This meets the KA because the FWLCS is placed in service to provide containment isolation under post-LOCA conditions.