McGuire Nuclear Station
2020 NRC Exam Post Exam Comments

1. **Admin JPM RO A1a, Complete a Surveillance for Mode Change: Remove critical step identifying LCO 3.5.1 as applicable.**

Explanation:

The Task Standard for Admin JPM RO A1a is as follows:

"The operator will complete Enclosure 13.4 of PT/1/A/4600/003 D in accordance with the attached KEY, determine that all Flex Strategy Administrative Limits are met, and determine that LCO 3.5.1 is not currently met.

Although the JPM name is "complete a surveillance for mode change", the "Initiating Cue" never mentions performing the task for a mode change. Performing the JPM for the plant conditions listed in the "Initial Conditions" would result in the JPM being performed for Mode 4.

Tech Spec LCO 3.5.1does not apply in Mode 4. Therefore, it is not critical to identify this LCO as not met.

Resolution:

Request that Admin JPM RO A1a, step 17, be updated to remove this step as a critical step.

2. **Admin JPM RO A2, Partial Loss of Annunciators: Critical data in the table(key) required to be filled out by the applicant.**

Explanation:

The Task Standard for Admin JPM RO A2 is as follows:

"The operator will determine that there are Alternative Methods procedurally identified for Surveillance associated with three of these annunciators, that one failure impacts the Semi-Daily Surveillance associated with TS SR 3.6.4.1, that one failure impacts the Daily Surveillance associated with SLC 16.7.3, and that one failure impacts an AP/EP Time Critical Task per the attached KEY".

Per the Task Standard, only the items that are required to be identified in the applicable portion of the table are considered critical.

Identifying additional items in any of the table sections that are no or none would not be critical per the Task Standard.

For example: Identifying SLC 16.9.26 for 1AD-13, C-1 is not correct because SLC 16.9.26 is entered due to inoperable level monitors, not annunciator alarm issues. Therefore, including this information in a block where none is listed in the key would not be critical.

Resolution:

Request the applicable table(key) in JPM RO A2 be updated to state "Identifying no or none in the applicable blocks of the table is NOT critical".

3. **Systems (Control Room) JPM H, Start and Stop the 1B NCP for NCS Venting: One applicant secured the pump, is this an acceptable response?**

Explanation:

Upon starting the 1B NCP per OP/1/A/6150/002 A (Reactor Coolant Pump Operation), one applicant immediately began to monitor NCP motor bearing temperatures on the 1B NCP OAC graphic. Motor bearing temperatures on the 1B NCP OAC graphic rose to a temperature of 207°F. Upon seeing this temperature, the applicant secured the 1B NCP.

Per OP/1/A/6150/002 A (Reactor Coolant Pump Operation) Limits and Precautions, NC Pump trip criteria are: Any pump motor bearing temperature exceeding 195°F.

Per AP-08 (Malfunction of NCP) Case II, NCP trip criteria are: Any pump motor bearing temperature exceeding 195°F.

Resolution:

The facility endorsed position is that the applicants response was acceptable for the conditions present.

4. **Systems (In-Plant) JPM K, Establish NC Pump Seal Injection from the SSF: This JPM is denoted as time critical. Performing this JPM in a static mode with the examiner having to provide cues for equipment status, Is timing this task for time critical performance valid?**

   Explanation:

   Performance of the" Establish NC Pump Seal Injection from the SSF" task is a short duration time critical action. 3 minutes and 50 seconds is listed in plant documents for this particular portion of the of the task. This JPM should evaluate the correct manipulation of components. With the short duration of the task and the static mode of the JPM, communication of JPM cues and repeat backs will result in increased execution time.

   The time critical nature of this task is better evaluated by an active JPM using a simulator.

   Resolution:

   Request that the time critical criteria for this task be removed.

5. **Scenario N20-1-1, Event 4 Dropped Rod: During Event 2 Power Range Instrument N-42 fails high. With only three power ranges available and power greater than 75%, can entry conditions into Tech. Spec> 3.2.4 (QPTR) be directly determined?**

Explanation:

The original submittal identified Tech Spec 3.2.4 (QPTR) condition 'A' as being an applicable Tech Spec for this failure. It has since been determined that Tech Spec 3.2.4 (QPTR) is not applicable for this particular scenario.

The following information is from Tech Spec 3.2.4 (QPTR) and Tech Spec 3.2.4 Bases:

SR 3.2.4.2 NOTE:

"Only required to be performed if input from one or more Power Range Neutron Flux channels are inoperable with THERMAL POWER ≥ 75% RTP"

Verify QPTR is within limit using the movable incore detectors.

SR 3.2.4.2 BASES:

"This Surveillance is modified by a Note, which states that it is required only when the input from one or more Power Range Neutron Flux channels are inoperable and the THERMAL POWER is ≥ 75% RTP.

With an NIS power range channel inoperable, tilt monitoring for a portion of the reactor core becomes degraded. Large tilts are likely detected with the remaining channels, but the capability for detection of small power tilts in some quadrants is decreased. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

For purposes of monitoring the QPTR when one power range channel is inoperable, the moveable incore detectors are used to confirm that the normalized symmetric power distribution is consistent with the indicated QPTR and any previous data indicating a tilt".

Resolution:

Request the applicable ES-D-2 be updated to reflect that entry into Tech Spec 3.2.4 is NOT required.