

Question # 87

87. Given the following plant conditions:

- Unit 1 is in MODE 2.
- A loss of 125 VDC Vital Battery Board I occurs.

Which one of the following completes the statements below?

RTA (reactor trip breaker A) main control board indication (1) available.

In accordance with Basis of LCO 3.3.1 "RTS Instrumentation" RTA (2) OPERABLE.

- | | (1) | (2) |
|----|---------------|---------------|
| A. | is | remains |
| B. | is | is NOT |
| C. | is NOT | remains |
| D. | is NOT | is NOT |

"D" was designated as the correct answer on the approved exam.

Reference: Basis of LCO 3.3.1 "RTS Instrumentation"

Facility Comment:

The question directly asks the status of whether or not "In accordance with the (basis of LCO 3.3.1 "RTS Instrumentation" RTA _____ OPERABLE). Regarding the Reactor Trip Breaker the item affected for operability by the given plant conditions is the shunt trip mechanism.

In accordance with the [TVA SEQUOYAH TECHNICAL SPECIFICATION BASES of LCO 3.3.1 Function 17 - Reactor Trip Breakers], Function 17 is explicit in stating that this trip function ... "applies to reactor trip breakers exclusive of individual trip mechanisms". The loss of 125V DC Vital Battery Board I only affects the ability of one of the two tripping mechanisms of the reactor trip breaker's trip mechanism to function. Both trip mechanisms are addressed by a separate function and action condition evaluated under [TVA SEQUOYAH TECHNICAL SPECIFICATION, Function 18 - Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms]. This Function 18 requires each of the two trip mechanisms to be operable, which is independent of the operability of the reactor trip breaker. Therefore, the correct answer in this case is that RTA remains OPERABLE since loss of function 18 does not require the reactor trip breakers to be declared INOPERABLE

Facility Recommendation:

Change Answer Key to reflect "C" as the correct answer.

Question # 94

94. Given the following:

A Work Control Center (WCC) SRO has previously held a SRO license at SQN, but does not currently hold a SRO license.

In accordance with OPDP-1 "Conduct of Operations" which of the following completes the statements below?

This WCC SRO (1) authorize switchyard access.

This WCC SRO (2) be the incident commander

- | | (1) | (2) |
|----|----------------|----------------|
| A. | can | can |
| B. | can | can NOT |
| C. | can NOT | can |
| D. | can NOT | can NOT |

"A" was designated as the correct answer on the approved exam.

Reference: OPDP-1 "Conduct of Operations"

Applicant Comment (Docket# 55-23468):

The question asks the duties of a WCC SRO specific to procedure [section 3.1.9 A.3 of OPDP-1 Rev 45].

The list of duties in the referenced procedure is preceded by the statement "Typical WCC SRO duties may include the following". Specifically the Incident Commander duty has specific training requirements.

The stem of the question does not give the required information (qualification status of Incident Commander) to conclude an answer. This question should be removed from the exam.

Facility Position on Applicant Comment:

Facility contends that "A" OR "B" are both correct due to unaddressed qualification requirements, specifically with the Incident Commander portion of the question.

Justification:

The question references [OPDP-1] for the qualification requirements and typical duties for a Work Control Center (WCC) SRO. The question does not address the qualification requirements of an Incident Commander and therefore more information is needed to answer the question.

In [OPDP-1 "CONDUCT OF OPERATIONS", Section 3.1.9 [A.]] addresses the three specific qualification levels for the position of WCC-SRO. OPDP-1 states the following:

1. The WCC SRO is qualified if currently holding an SRO license.
2. The WCC SRO is qualified if the individual is a watch-qualified STA with a SRO Certification. In this case, the individual may sign documents normally signed by the NUSO (Nuclear Unit Senior Operator), but cannot sign where an SRO signature is required.
3. The WCC SRO is qualified if the individual has held an SRO license at the facility. In this case, the individual may sign documents normally signed by the NUSO but cannot sign where an SRO signature is required. The individual must meet site specific training requirements.

The question requires knowledge of [OPDP-1 section 3.1.9 [A.3]] as stated above. However, since the Incident Commander is a separate qualification and has separate training requirements, more information is needed to answer the question. Information including qualification status of Incident Commander would have clarified the question, but also would not have allowed the opposite distractor to be plausible.

A similar example is as follows: [OPDP-1 section 3.1.8 [L.]] lists typical duties for a NUSO which may include duties such as Incident Commander and STA (Shift Technical Advisor). In addition to the Incident Commander position, the STA duty is a similar situation where a NUSO needs additional training and qualification to fill the position of the STA.

Facility Recommendation:

Since both "A" and "B" are mutually exclusive correct answers for this question depending on the circumstance and specifics not given in the stem of this administrative question, the Facility recommends removing question 94 from the exam.

TIMOTHY E. RIEGER  3/31/2020
Facility Representative