ENCLOSURE 4

MISSISSIPPI POWER & LIGHT COMPANY
Helping Build Mississippi
P. O. BOX 1640, JACKSON, MISSISSIPPI 39215-1640

August 16, 1985

NUCLEAR LICENSING & SAFETY DEPARTMENT

U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323

Attention: Dr. J. Nelson Grace, Regional Administrator

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 0260/L-860.0
NRC Examinations
AECM-85/0259

On August 12, 1985, NRC examiners gave a written examination to 13 candidates for NRC Operator and Senior Operator Licenses and Instructor Certification. Upon completion of the examination, a copy of the examination was supplied to MP&L with the request that the exam be reviewed and any appropriate comments be furnished to the NRC.

The following comments are supplied pursuant to that request:

GENERAL

1. With the exception of the below noted technicalities, MP&L thought the examinations to be fair, comprehensive and well written examinations.

SENIOR REACTOR OPERATOR EXAMINATION

1. Question 6.06 is unclear since it does not specify that only the referenced annunciator was received. If it was assumed that other annunciators were received then answer 6 would be correct. Since students cannot state assumptions on multiple choice questions, full credit should be given for answer b or c.

2. Question 6.23 - The answer key for this question references GGNS Lesson Plan OP-N32-2-501. Although the answer given by the key is in one portion of the lesson plan, a more complete answer is presented in section 1.4.a.6.d of the lesson plan. This section lists a Turbine Trip as well as the two answers given in the key. Therefore, a Turbine Trip should also be considered a correct response. A copy of the lesson plan is attached for your reference (Attachment 1).

Official Copy

85-220

3. Question 7.02 - This question requested the 3 immediate operator actions following a failure of rods to insert on a scram with power at 6%. ONEP 05-1-02-I-1 requires the operator to enter EP-10 if power is greater than 5%. Only if power is less than 5% does the referenced ONEP give other immediate actions. Therefore, it is requested that consideration be given to accepting reasonable actions from EP-10 as correct responses as well as those other actions listed in the ONEP. A copy of ONEP 05-1-02-I-1 is attached for your reference (Attachment II).

4. Question 7.06 - This question asked for three (3) conditions to be met prior to restoring a system to service following an automatic isolation per ONEP 05-1-02-III-5. The referenced ONEP does not require three conditions but rather lists only two conditions for verification of system integrity. These two conditions are:

   1) verification that the system is intact and
   2) verification that the operation of the system will not result in an uncontrolled release to the environment.

   The remaining verbage of the sentence states methods by which these two conditions can be verified i.e., visual inspection of accessible areas and/or observation of available Process Radiation Monitoring instrumentation and other available indications for inaccessible areas. Since the caution statement in the referenced ONEP is admittedly poorly worded and examinees were undoubtly confused by the question, it is requested that this question be removed from the examination. If not removed, generous latitude should be given when considering other reasonable answers. ONEP 05-1-02-III-5 is attached for your references (Attachment III).

5. Question 7.09 - IOI 03-1-01-1 actually lists 9 conditions in section 6.2.17 to be met prior to transfer to run. Any four (4) of these nine requirements should be given full credit rather than the 5 listed in the answer key. IOI-03-1-01-1 is attached for your reference (Attachment IV).

6. Question 7.11 - Administrative Procedure 01-S-06-2, section 6.6.2.d states that operators need only to memorize the entry conditions for EP-1, EP-3 and EP-10, other Emergency Procedures then are entered from these. This is done to minimize the effort necessary to recognize an entry into an Emergency Procedure and therefore minimize the chance of human error. Although operators are to be generally familiar with the Emergency Procedures other than EP-1, EP-3 and EP-10, they may not know the precise entry conditions.

Technical Specifications 3.6.3 gives a limit of 120° for suppression pool temperature before requiring depressurization of the reactor.

Because of the similarity between the Technical Specifications and the requirements of EP-5 and due to the proximity of answer b to the limit of Technical Specification 3.6.3, we are concerned that the examinees may have confused the requirements and hence answered b vice d. It is requested that answer b be given consideration for full credit. A copy of Administrative Procedure 01-S-06-2 is attached for your use (Attachment V).

7. Question 7.20 - The answer given in the answer key reflects the system limitation (65 mw) as given in the caution note prior to step 5.2 of the referenced IOI 03-1-01-2. However step 5.2 gives a procedural limitation of 25 mw. Therefore, full credit should be given for an answer of 25 mw as well as the answer given in the key. IOI 03-1-01-2 is attached for your use (Attachment VI).

8. Question 8.06 - The procedure referenced states "When performing electrical lineup and when applicable, verify...."(underline ours). Since the question did not reference any applicable or specific breaker, consideration should be given to other reasonable answers and credit given for these other answers as appropriate. A copy of procedure 02-S-01-2 is attached for your reference (Attachment VII).

REACTOR OPERATOR EXAM

1. Question 2.06 - The GGNS Lesson Plan referenced (OP-P33-501) was in error in stating a sampling subsystem station was located on the refueling floor. It should have stated the sample station was on the 185' elevation of the containment. Since the incorrect reference to the refuel floor in the question could have caused the examinees confusion, consideration should be given to reasonable answers other than those listed in the key.

2. Question 2.07 - The lesson plan referenced gives three limitations imposed on the SSW System by a loss of instrument air:

   a) causes all air operated valves to fail shut
   b) loss of make-up water to basins
   c) isolation of fill tank

It further states that loss of air does not affect overall operation of the system. The hypochlorite and acid additions were not mentioned in the lesson plan since these operations are performed manually rather than by using the installed systems. Therefore, reasonable answers other than the loss of chemical addition capability should be considered.

3. Question 2.20 - As well as the answer listed in the key, Technical Specification Table 3.3.7.1-1, item 6, footnote (h) notes other conditions rather than just hi-hi activity in the air intake duct (such as two downscales) which will result in an automatic isolation of the Control Room Ventilation System. Responses consistent with this Technical Specification should be given full credit.

4. Question 3.17 - Same comments as for Question 6.23 on the SRO exam.

5. Question 4.01 - Same comments as for Question 8.06 on the SRO exam.

6. Question 4.03 - Same comments as for Question 7.02 on the SRO exam.

7. Question 4.06 - Same as comments for Question 7.06 on the SRO exam.

8. Question 4.09 - Same as comments for Question 7.09 on the SRO exam.

9. Question 4.19 - Same comments as for Question 7.20 on the SRO exam.

Should you require any further information concerning these comments, please contact Mr. Gary Lhamon of the GGNS plant staff.

Yours truly,

L. F. Dale
Director

LFD:bsc

Attachments

cc: (See next page)

cc: Mr. J. B. Richard (w/a)
Mr. O. D. Kingsley, Jr. (w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/a)
Mr. R. C. Butcher (w/a)

Mr. James M. Taylor, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555