

2014 PALISADES NUCLEAR PLANT NRC INITIAL LICENSE EXAMINATION  
OPERATING TEST SUBMITTAL COMMENTS

	NRC Comments	Facility Action/Response
RO A1a	<p><b>DETERMINE QUADRANT POWER TILT PER PO-3</b></p> <ol style="list-style-type: none"> <li>Allowable error is <u>typically</u> ½ of one division for meter readings, which is carried through in the calculations. Your current 1% tolerance may be more or less than this (is there a basis?).</li> <li>Expected meter readings and calculated values (<math>\pm</math> allowances) should be provided to the examiner in the STANDARD to allow evaluation as the JPM is being conducted.</li> <li>The applicant should inform the CRS if the QPTR values appear to be as expected or not. The cue should say "...calculate Excore Quadrant Power Tilt utilizing Power Range NI Channels on Panel C-06 only and report your results."</li> </ol> <p>Procedure specifies that out of tolerance readings are to be reported to the supervisor in charge (US/CRS). Procedure incorporates TS 3.2.3 limits by reference (4.5.2).</p> <p>Task Element 4 states that the acceptance criterion is for the four quadrant tilt values to sum to zero. However TS state that the highest value must be LTE 0.05. Explain.</p> <p>The last Task Element should require that the performer notify the US/CRS of any out of tolerance readings. Two of the four tilt values recorded on the answer key are out of tolerance. There should be a "Critical Step" associated with identifying and reporting the out of tolerance values.</p> <ol style="list-style-type: none"> <li>Cue should simply read "Perform a Quadrant Power Tilt calculation using the Excore instruments in accordance with PO-3, Alternate Incore and Excore Applications, Section 5.2."</li> <li>Provide a marked-up working copy with the CUE.</li> </ol>	<ol style="list-style-type: none"> <li>One percent is ½ of a division.</li> <li>Provided on Answer Key</li> <li>Cue added to drive applicant to inform.</li> <li>Revised</li> <li>To be provided.</li> </ol>

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	<p>Post Validation Comment</p> <ol style="list-style-type: none"> <li>1. Task Elements 4 and 6 should be critical steps.</li> <li>2. Task Element 6 standard should include recognition that the Quadrant Power Tilt values for quadrants 1 and 2 exceed the TS LCO limit of 0.05.</li> </ol>	<p>Post Validation</p> <ol style="list-style-type: none"> <li>1. Changed to Critical Steps</li> <li>2. Element Standard updated to include recognition that limit has been exceeded.</li> </ol>
RO A1b	<p><b>ESTIMATION OF RIA-0631, CONDENSER OFF GAS MONITOR COUNT RATE</b></p> <ol style="list-style-type: none"> <li>1. They are initially GIVEN the 0.1 gpm value, which requires no analysis or decision. While needed to complete the task, it is credited in Task Element 4, and should only be considered a critical task there (and NOT Task Element 1).</li> </ol> <p>Revise the INITIATING CUE to read: "... directs you to estimate the count rate on RIA-0631, Condenser Off Gas Monitor that would require entry into Action Level 3, using Attachment 1 of AOP-24."</p> <ol style="list-style-type: none"> <li>2. TASK ELEMENT 2 – Instead of providing a verbal cue perform where applicant can obtain the indicated value or provide a copy of the ESOMS narrative log.</li> <li>3. <del>The applicant should inform the CRS if the count rate values appear to indicate if the next action level actions are required (and modify the initial cue accordingly).</del> [the calculation establishes the estimated trigger point]</li> </ol>	<ol style="list-style-type: none"> <li>1. Initiating cue was revised as requested.</li> <li>2. Narrative log provided.</li> </ol>

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RO A2	<p><b>PERFORM TSST MO-8 COMPARISON OF <math>\Delta T</math> POWER VS ACTUAL POWER</b></p> <ol style="list-style-type: none"> <li>1. Revise the INITING CUE by deleting "Section 5.2, "... Power," of" (should read perform MO-8). [The JPM will be terminated when the applicant reports the out of spec reading.]</li> <li>2. TASK ELEMENT 1 – Provide the applicant of a working copy of entire procedure.</li> <li>3. TASK ELEMENTS 2-4 – Why is there <u>any</u> allowance for the values obtained from the PPC MO-8 Trend Screen?</li> <li>4. <del>Provide the examiner with a KEY (a copy of MO-8, section 5.2, filled in with the expected values) as part of the JPM package.</del></li> </ol>	<ol style="list-style-type: none"> <li>1. Left as is.</li> <li>2. Entire procedure to be provided.</li> <li>3. Expected PPC values were removed from the standards and included as Evaluator Notes. Values are a function of the setup and may be somewhat variable.</li> </ol>
RO A4	<p><b>OBTAIN METEOROLOGICAL DATA FOR EMERGENCY NOTIFICATION FORM</b></p> <ol style="list-style-type: none"> <li>1. JPM should require the applicant to obtain the printout using the computer otherwise the JPM is simply a data gathering exercise similar to the first three.</li> <li>2. Time in Task Element 4 needs to match Time Critical spec at front of procedure.</li> </ol>	<ol style="list-style-type: none"> <li>1. No changes made since ROs would not be expected to manipulate the WSI computer.</li> </ol>

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SRO A1a	<p><b>DETERMINE AVERAGE QUALIFIED CET TEMPERATURE AND SUB-COOLING VALUE</b></p> <ol style="list-style-type: none"> <li>1. Remove PCS Pressure from the initial conditions. It is provided in TASK ELEMENT 4 when applicant locates appropriate indicator (revise TE 4 as needed).</li> <li>2. Allowable error is <u>typically</u> ½ of one division for meter readings, which is carried through in the calculations. The current <math>\pm 2^{\circ}\text{F}</math> tolerance may be more or less than this (is there a basis?).</li> <li>3. Why are the Override Values and Equipment IDs on the answer key?</li> <li>4. What is the tolerance for Task Element 4 (Subcooling and PCS Pressure) <u>and</u> what is the basis for the tolerance? [Pressure is given as 1750 psia; <math>T_{\text{sat}}</math> should be 616 to 618 degrees F this would make the acceptable range 79 +/- 1 degrees].</li> <li>5. For Task Element 4 would it be acceptable for applicant to use a Steam Table? Is the PI-0104 scale in PSIA?</li> </ol>	<ol style="list-style-type: none"> <li>1. Value removed from initial conditions</li> <li>2. Digital values therefore no tolerance is needed. If values change during setup the key will have to be corrected.</li> <li>3. Removed from key.</li> <li>4. Acceptance value changed to 79 +/- 1 degree.</li> <li>5. Task standard revised to also allow use of steam table.</li> </ol>
SRO A1b	<p><b>MONITOR PCS HEATUP/COOLDOWN WITH THE PPC</b></p> <ol style="list-style-type: none"> <li>1. IF it is acceptable for the applicant to start <u>directly</u> in Task Element 3 (as implied in Task Element 1), then Task Element 2 <u>cannot</u> be considered a critical step. Task Element 1 should specify whether it is acceptable or not, and Task Element 2 adjusted accordingly.</li> <li>2. The standard for Task Element 7 should specify <u>which</u> elements of the task that are considered to be critical.</li> <li>3. For Task Element 8, how is entering an LCO supposed to be documented? Once the LCO is identified <u>AND</u> properly documented, the task is complete.</li> </ol>	<ol style="list-style-type: none"> <li>1. addressed</li> <li>2. Steps 7 and 8 combined and simplified.</li> </ol>

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SRO A2	<b>REVIEW AND APPROVE A COMPLETED TECHNICAL SPECIFICATION SURVEILLANCE TEST</b>  No comments	Editorial change to setup instructions to include page and step numbers where errors are located.
SRO A3	<b>VERIFY WASTE GAS RELEASE HIGH ALARM SETPOINT</b>  1. This is an exercise in simply checking whether the applicant can add two numbers. There is no discriminatory value here.  2. What is the basis for the acceptable range of values for <u>each</u> critical step? [How can the acceptable value be less than the 8.5E3 when you are adding a positive value to it?) Change acceptance criteria to 8.5-8.6 E3  <del>3. What is the procedural basis for this JPM? I see no requirement in the procedure to perform this step.</del>	JPM revised to have applicants actually determine setpoint by performing steps 7.5.h – j. <ul style="list-style-type: none"> <li>• Revised (deleted) the 4<sup>th</sup> bullet in the Initial Conditions to match change to task.</li> <li>• Updated Evaluator Cue at top of page 4.</li> <li>• Corrected acceptance criteria to 8.5 – 8.6 E3.</li> <li>• Corrected TASK ELEMENT # for task 4.</li> <li>• Removed blank page.</li> <li>• Verified correctness of data recorded on Attachment 3 of CH 6.23</li> </ul>

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<b>SRO A4</b>	<b>CLASSIFY EVENT</b> <ol style="list-style-type: none"> <li>1. A properly filled out SEP SUP 1, "Site Emergency Plan Supplement 1 – EAL Wall Charts" should be provided as a key of the Task Element 2 critical step.</li> <li>2. Error on Data Page (page 2 of 9) – Task Standard should state "Alert" rather than "Site Area Emergency"</li> <li>3. INITIATING CUE – Delete "During activation of the Site Emergency Plan"</li> <li>4. Procedure steps for the Task Elements should identify the appropriate step of EI-1</li> <li>5. TASK ELEMENT 1 – Should state: Refers to SEP Supp 1 Mode 5, 6. or DEF and recognizes that the Cold SD/Refuel System Malfunction Category is applicable. Standard needs to be corrected also.</li> <li>6. TASK ELEMENT 2 should state: "Determines that the CA4.1 Emergency Action Level (EAL) threshold has been exceeded.</li> <li>7. TASK ELEMENT 4 – Should state: Initiates Emergency Actions/Notification form and performs or delegates the actions listed.</li> <li>8. TASK ELEMENTS 5 and 6 should be one step and is "TIME CRITICAL" also (must be filled out such that notifications can be initiated within 15 minutes of Emergency Classification/declaration).</li> </ol>	<ol style="list-style-type: none"> <li>1. EAL Wall Chart will be available.</li> <li>3. Updated Validation Time to reflect changes made.</li> <li>4. Corrected</li> <li>5. Corrected</li> <li>6. Corrected</li> <li>7. Corrected</li> <li>8. Corrected</li> <li>9. Corrected</li> <li>10. Steps combined and corrected time limit.</li> <li>11. "Radiological Release in Progress" status for Task Element 5 Critical Elements and Answer Key revised to match.</li> </ol>

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CR Sys a	<b>GRAVITY FEED BORATION WHILE SHUTDOWN</b> <ol style="list-style-type: none"> <li>1. "Determine that Charging Pump P-55B has Tripped" (Task 11) is NOT a critical step - only <u>actions taken</u> to address the failure are critical.</li> <li>2. ONLY actions essential to completing the task are critical. There may be non-critical actions within this JPM that are currently identified as critical – verify at OV.</li> <li>3. Delete the two bulleted items from the INITIATING CUE</li> <li>4. TASK ELEMENT 6 should be incorporated into the first 5 task elements.</li> <li>5. Why is this JPM an alternate path JPM? Neither the SOP or the ARP give guidance that permits the pump to be restarted without determining why the pump tripped. How does the applicant know that the check valve referenced in the NOTE stuck shut or that the pump tripped for other reasons.</li> <li>6. TASK ELEMENT 15 should be prefaced with "After 2 minutes, "</li> </ol>	<ol style="list-style-type: none"> <li>1. No longer a critical step</li> <li>2. Verified during onsite validation.</li> <li>3. Bulleted items deleted.</li> <li>4. Restructured format</li> <li>5. Applicant has to evaluate why the pump tripped and then restore a pump to operation.</li> <li>6. Task element standard revised.</li> </ol>
	<b>Post Validation (JPM was revised such that Charging Pump B is initially running)</b> <ol style="list-style-type: none"> <li>1. Procedure to be handed out with Initiating Cue should be front-end through page 13 and Section 7.5.3.</li> <li>2. Section 7.1 should be available upon request.</li> <li>3. CUE for Task Element 5 should be to provide applicable ARPs upon request (or reference to bound ARP)</li> </ol>	<ol style="list-style-type: none"> <li>1. Changes made as requested.</li> <li>2. Changes made as requested.</li> <li>3. Changes made as requested.</li> </ol>
CR Sys b	<b>MANUALLY INITIATE CONTAINMENT ISOLATION</b> <ol style="list-style-type: none"> <li>1. It appears the K/A was modified <u>incorrectly</u> to fit the JPM. Using the procedures to address the malfunction (the part deleted) seems to apply more than predicting any impacts.</li> <li>2. Task Element 4 (taking the actions) is critical but Task Element 3 ("verifying") is NOT.</li> </ol>	<ol style="list-style-type: none"> <li>1. K/A statement was changed to include complete statement.</li> <li>2. Task Element 3 changed to be non-critical.</li> </ol>

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CR Sys c	<p><b>PERFORM POST RAS STEP 54 OF EOP-4.0</b></p> <ol style="list-style-type: none"> <li>1. Task Element 2 (taking the actions) is critical but Task Element 1 (“verifying”) is NOT.</li> <li>2. Task Element 4 is critical only if a HPSI pump is stopped and NOT critical if no verifiable action is taken. If PCS pressure falls back below 1470 psia, this would leave only ONE critical step, and invalidate the JPM.</li> <li>3. <b>TASK ELEMENT 3 – What are the SI Throttling Criteria? Why is the step to throttle the injection valves skipped? The cue to stop the SI pump seems to circumnavigate the procedural guidance.</b></li> </ol>	<ol style="list-style-type: none"> <li>1. Task element 1 reclassified as non-critical.</li> <li>2. Setup adjusted so that HPI flow remains below 100 gpm.</li> <li>3. Throttling criteria added to the standard for Task Element 3.</li> </ol>
CR Sys d	<p><b>BYPASS MSIV CLOSURE</b></p> <ol style="list-style-type: none"> <li>1. <b>INITIATING CUE – change “ensure” to “verify.” The applicant has no way to ensure that the block is successful.</b></li> <li>2. Task Element 4 is NOT critical if no verifiable action is taken. <b>[Maybe step should be to determine what caused the MSIVs to close, to support decision to open the MSIV bypasses.]</b></li> </ol> <p><b>Suggest changing the CUE to: Stabilize SG pressure at the current value using one of the alternate cooldown methods specified in GCL-9”; and let the applicant choose.</b></p> <p>Task Elements 5 and 6 contain critical tasks, but are both part of the same step. If these were considered one critical step and “determining that both MSIVs have closed” (Task Element 4) is not, then there would only be one critical task.</p> <p><b>TASK ELEMENTS state that the applicant does not have to use step 2.15. The Alternate Path requires procedural guidance to be used. If step 2.15(or alternatively 2.13) is not used then where does the guidance to open the MSIV Bypasses come from.</b></p>	<ol style="list-style-type: none"> <li>1. Changed as requested</li> <li>2. JPM revised to address concerns.</li> </ol>



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CR Sys e	<b>ALIGN CONTAINMENT AIR COOLERS</b> <ol style="list-style-type: none"> <li>1. Task Element 6, <u>Determining</u> that the Standby Service Water Pump P-7C needs to be started is NOT a critical step, <u>starting</u> it is.</li> <li>2. Applicants should be provided with a working copy of the entire procedure (SOP-5) not just applicable sections.</li> <li>3. Starting a third Service Water pump Is not an alternate path; it is an anticipated action as discussed in step 5.2.3</li> </ol>	<ol style="list-style-type: none"> <li>1. Corrected.</li> <li>2. Entire procedure to be provided.</li> <li>3. Alternate path since abnormal condition must be identified and corrected.</li> </ol>
CR Sys f	<b>PERFORM A DIESEL GENERATOR (D/G) VOLTAGE TEST ON 1-1 D/G</b> No Comments	
CR Sys g	<b>ADJUST RIA-1049 SETPOINT</b> No Comments	
CR Sys h	<b>TRANSFER SHIELD COOLING COILS</b> Does "CHECK running Shield Cooling Pump P-77A OR P-77B." have to be done 3 times (for each window), as specified in Task Elements 5, 6 & 7? If not, it should only be one critical step (and then only if verifiable actions are taken).	No. Steps combined with such that status checked once and a single critical element to start standby pump.
IP Sys i	<b>ENERGIZE BUS 1C FROM STARTUP TRANSFORMER 1-2 LOCALLY</b> <ol style="list-style-type: none"> <li>1. Provide a picture or drawing showing the inside of the breaker cubicle in sufficient detail to show fuse block locations and breaker position (open/closed).</li> <li>2. Provide picture showing inside of storage cube (where local/remote switch is located).</li> </ol>	

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IP Sys j	<b>MANUALLY START FIRE PUMP P-9A</b> <ol style="list-style-type: none"> <li>1. Delete "section 7.2.1" from "INITIATING CUE"</li> <li>2. Delete 2<sup>nd</sup> bullet from "INITIATING CUE"</li> <li>3. TASK ELEMENT 2 should not be a CRITICAL STEP</li> <li>4. Add task element after latching of manual operator to check pump discharge pressure.</li> </ol>	<ol style="list-style-type: none"> <li>1. Section reference removed from cue.</li> <li>2. Second bulleted item removed.</li> <li>3. Reclassified Task Element as non-critical</li> <li>4. Task Element added.</li> </ol>
IP Sys k	<b>SUPPLY ALTERNATE SUCTION SOURCE TO AFW PUMP P-8C</b> No Comments	

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<b>Scenario 1 (1401S)</b>	<p>Event 2</p> <ol style="list-style-type: none"> <li>How far is power expected to be reduced</li> <li>How much boron is expected to be added and/or Control Rods Inserted.</li> </ol> <p>Event 4</p> <ol style="list-style-type: none"> <li>Who normally bypasses the RPS Trip Functions? If it is normally the BOP, then need to find a different malfunction which requires the ATC to respond rather than artificially direct the ATC to respond.</li> </ol> <p>Event 5-7</p> <ol style="list-style-type: none"> <li>Event 5 should not be counted as a separate event. It is the beginning of the Major Transient (Event 6)</li> <li>Critical Tasks – Need to clearly identify what actions are required to satisfy the critical task, including conditions (time frame or parameter) that determine that the task was not completed in a timely manner.</li> </ol> <p>Remove E-Plan Classification (Not a CRS function)</p> <p>What is the basis for the step to isolated feed to a faulted/ruptured SG in EOP 1? This seems to be an exception to the CE EPG. Should isolating feed to the affected SG be a CRITICAL task, to be completed prior to exiting EOP 1?</p> <p>Still need to identify success/failure criteria (with a basis) for isolating the ruptured SG. [e.g., before transitioning to EOP-9]</p>	<ol style="list-style-type: none"> <li>To approximately 65%</li> <li>Most likely no boron; approximately 1100 steps.</li> </ol> <ol style="list-style-type: none"> <li>BOP reassigned. Added CCW leak.</li> </ol> <ol style="list-style-type: none"> <li>Combined with SGTR event.</li> <li>Required information was added.</li> </ol> <p>Removed.</p> <p>Step added to EOP-1 as prudent operator action but EPG does not require the action to be completed until addressed in the subsequent EOPs.</p> <p>Facility established that MCR actions for isolating the SG to be completed within 50 minutes from the initiation of the event. Basis is the FSAR.</p>

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<b>Scenario 2 (1402S)</b>	Event 3	
	1. What is the expected response?	1. Either is acceptable.
	a. Start in NORMAL or	
	b. Start in EMERGENCY	
	2. Are any actions necessary to place/return the cooling water system (CRV) to service? If so add them.	2. No change is necessary
	Events 6 & 8	
	1. Critical Tasks – Need to clearly identify what actions are required to satisfy the critical task, including conditions (time frame or parameter) that determine that the task was not completed in a timely manner.	1. Required information added.
	2. How is the SI Train Malfunction different from Scenario 1?	2. Auto (and manual PB) actuation of right train prevented due to loss of EY-20
	Remove E-Plan Classification (Not a CRS function)	Removed.
	What is the basis for the step to isolated feed to a faulted/ruptured SG in EOP 1? This seems to be an exception to the CE EPG. Should isolating feed to the affected SG be a CRITICAL TASK, to be completed prior to exiting EOP 1?	Step added to EOP-1 as prudent operator action but EPG does not require the action to be completed until addressed in the subsequent EOPs.
	Still need to identify success/failure criteria (with a basis) for isolating the faulted SG. [e.g., before exceeding the max sub-cooling limits of Supplement 1]	Facility established that MCR actions for isolating the SG to be completed within 50 minutes from the initiation of the event. Basis is the FSAR.

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<b>Scenario 3 (1403S)</b>	<p>Event 5</p> <p>Is there another component failure/malfunction that could be used to replace the PCP pump high vibration for the ATC. This scenario from event 3 on is almost identical to the 2010 third scenario. Alternatively add a precursor event that could lead to the vibration problem (e.g., a high bearing temperature or seal failure).</p> <p>Events 3 &amp; 5</p> <ol style="list-style-type: none"> <li>1. Critical Tasks – Why are these “Critical Tasks”?</li> </ol> <p>Events 3, 5, &amp; 8</p> <ol style="list-style-type: none"> <li>2. Critical Task Need to clearly identify what actions are required to satisfy the critical task, including conditions (time frame or parameter) that determine that the task was not completed in a timely manner.</li> </ol> <p>Remove E-Plan Classification (Not a CRS function)</p> <p>On page 5 add ARP procedure reference for EK-3518 (ARP-24)</p> <p>Provide a basis for the 5 psig success/failure criteria for the critical tasks to manual initiate containment isolation and Containment Spray.</p>	<p>Event revised to include PCP seal failure.</p> <ul style="list-style-type: none"> <li>• Prevent an unnecessary reactor trip/SI actuation.</li> <li>• Prevent unnecessary ATWS actions.</li> </ul> <p>Actions and success/failure criteria added.</p> <p>Due to the slowly rising trend in containment pressure (relatively small leak) the actions to manually initiated Containment Spray are expected, but they are no longer tied the success/failure of the Critical Task.</p>

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<b>Scenario -- Spare (1404S)</b>	<ol style="list-style-type: none"> <li>1. Critical Task needs to clearly identify what actions are required to satisfy the critical task, including conditions (time frame or parameter) that determine that the task was not completed in a timely manner.</li> <li>2. Remove E-Plan Classification (Not a CRS function)</li> <li>3. It does not appear that Event 4 can be counted as an I/C event for the ATC or BOP. The only actions are diagnosis and verification of automatic actions. Neither RO has to perform any verifiable manipulations.</li> </ol> <p>What is the basis for the step to isolated feed to a faulted/ruptured SG in EOP 1? This seems to be an exception to the CE EPG. Should isolating feed to the affected SG be a CRITICAL task, to be completed prior to exiting EOP 1?</p> <p>Still need to identify success/failure criteria (with a basis) for isolating the faulted SG. [e.g., before exceeding the max sub-cooling limits of Supplement 1]</p>	<ol style="list-style-type: none"> <li>2. Removed</li> <li>3. Event 5 (old 4) classified as TS only for SRO.</li> </ol> <p>Step added to EOP-1 as prudent operator action but EPG does not require the action to be completed until addressed in the subsequent EOPs.</p> <p>Facility established that MCR actions for isolating the SG to be completed within 50 minutes from the initiation of the event. Basis is the FSAR.</p>