

Comments on STP Nuclear Operating Company's Draft Request for Exemption from Certain Requirements of the Fitness for Duty Rule for Managing Fatigue.

Following are our preliminary comments on draft request for exemption from requirements of 10 CFR Part 26, regarding managing fatigue.

- Please state if your request is for temporary exemption. After the rule is revised to address severe weather, would the exemption end?
- The request should state that the exemption is allowed by law.
- On page 10, under justification of exemption, criterion 1, 10 CFR 26.9 is cited as authorizing law. 10 CFR 26.9 is NRC rule. Atomic Energy Act of 1954, as amended is the law.
- The request should discuss precedents, e.g. how Turkey Point managed Andrew and how River Bend managed Katrina and Rita. What was NRC's response to licensee's actions?