

Attachment to Enclosure 3
Meeting Summary of June 2, 2010
Regarding Lessons Learned When Submitting A
Severe Winds Exemption Request
Dated June 24, 2010

Part 26 Subpart I, Managing Fatigue

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Severe Winds Exemption Request Lessons Learned

June 2, 2010

Agenda

- Purpose of today's meeting
- Introductions
- NRC Presentation
- Q&A



Introductions

- First, individuals in the meeting room at NRC
- Individuals on the phone, please introduce yourselves and the organization you are representing.



Overview

- Part 26, Oct 1, 2009
- 10 CFR Part 26.207(d) Plant Emergencies
- Hurricane Enforcement Guidance Memo
EGM-09-08, ML092380177
- Hurricane (Severe Winds) Exemption
Request

Lessons Learned

- When requesting an exemption, if the licensee has a “hurricane procedure(s)” please provide it along with the exemption request.



Lessons Learned

Good practice:

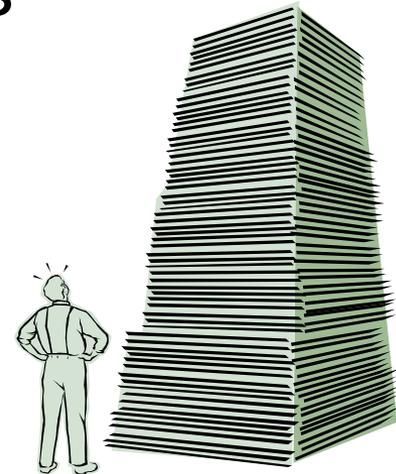
Review NUREG-1474 Effect of Hurricane Andrew on the Turkey Point Nuclear Generating Station from August 20-30, 1992. (published March, 1993)

- The request should discuss precedents.



Lessons Learned

- Be concise in the actual request for exemption.
- Please state if the request is for a temporary exemption.
- The request should state that it is allowed by law.



Lessons Learned

- The exemption is from certain work hour requirements, not fatigue management.
- The sites that have submitted thus far have done a good job indicating this.



Lessons Learned

Good practice:

STP mentions that there will be sufficient numbers of management and supervision available to provide additional oversight towards monitoring the effects of fatigue ensuring the safety and security of the facility.

Lessons Learned

- The exemption request does not overlap with the exception provided in 26.207(d) “Plant Emergencies”



Lessons Learned

- There are three potential circumstances:
 - High winds (preparation)
 - Recovery from the period of high winds (no plant emergency declared)
 - Recovery from the period of high winds and after a plant emergency has been declared.



Lessons Learned

- STP calls the individuals who will be sequestered the “storm crew.”
 - This was good because it allowed STP to specifically request an exemption for the storm crew.
 - Describe the make-up of the storm crew
 - Describe the shift schedule they will be working
- Others who are not on the “storm crew” will not be exempt from work hour controls.
- Clarify that the exemption is not for discretionary maintenance nor the direction of discretionary maintenance.



Lessons Learned

- Indicate how the storm crew is activated – what is the specific entry condition criteria.
- In general terms describe the accommodations that will be provided to the sequestered individuals.



Lessons Learned

- Indicate when/what criteria will signal the resumption of work hour controls, i.e. exit conditions.
- Who makes the call?

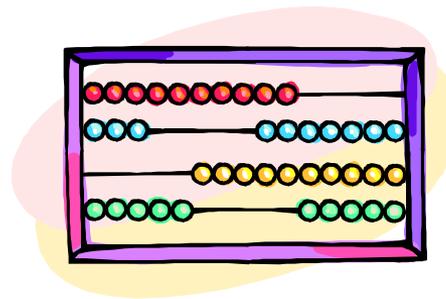


Lessons Learned

- Review the STP exemption request.
 - ML092930172
 - ML100490048
 - ML101160042
 - ML101340116

Lessons Learned

- Returning to work hour controls is a transition, and one that must be considered before-hand to be successful. NEI-06-11 Rev 1, Reset from Deviations will apply.



Lessons Learned

- STP committed to maintain certain information in their hurricane procedure.
 - The conditions necessary to sequester site personnel
 - Sequestered individuals will be provided an opportunity and accommodations for restorative rest
 - Conditions for departure from the exemption is based on a determination that adequate staffing is available

Lessons Learned

- Include an environmental assessment in your submittal



Lessons Learned

- It is expected that the licensee has completed a reasonable amount of hurricane preparation prior to the need to sequester personnel to minimize personnel exposure to high winds.
- Review the EGM to understand if you meet the criteria for enforcement guidance. However, an NRC review for enforcement discretion is not a review for an exemption.



Lessons Learned

- It is all about managing fatigue.

Questions