From: Kalyanam, Kaly
Sent: Tuesday, October 05, 2010 11:36 AM
To: STEELMAN, WILLIAM J; POLLOCK, JIM
Subject: Waterford 3 Exemption Request, TAC No. 4016. Request for Additional Information

Billy,

By letter dated May 27, 2010, Entergy Operations, Inc. (Entergy), pursuant to 10 CFR 26.9, submitted an exemption request for Waterford Steam Electric Station, Unit 3 (Waterford 3) to extend the exception currently provided in 10 CFR 26.207(d), which states: "Licensees need not meet the requirements of Sections 26.205(c) and (d)" during declared emergencies, as defined in the licensee's emergency plan." Sections 26.205(c) and (d) establish work hour scheduling and duration limits for individuals performing certain types of duties as defined in Section 26.4.

The TAC No. for this request is ME4016.

The NRC Staff has reviewed the exemption request and determined that we require additional information to complete our review. A request for additional information appears below. The NRC staff and the Waterford 3 engineers had a telephone call on October 10, 2010, in which clarifications were provided to the RAI questions. Additionally, Jim Pollock of your staff agreed to provide the response to the RAI within 30 days from the date of this email.

Thanks

Kaly

REQUEST FOR ADDITIONAL INFORMATION

EXEMPTION REQUEST REGARDING

"10 CFR 26 SUBPART I - MANAGING FATIGUE"

REQUEST FOR ADDITIONAL INFORMATION

WATERFORD STEAM ELECTRIC STATION UNIT 3

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-382

By letter dated May 27, 2010, Entergy Company, the utility for Waterford 3 requested an exemption to extend the provision in 10 CFR 26.207(d), which states: "Licensees need not meet the requirements of Sections 26.205(c) and (d) during declared emergencies, as defined in the licensee's emergency plan." Sections 26.205(c) and (d) establish work hour scheduling requirements, work hour limits, and minimum break and day off requirements for individuals performing certain types of duties as defined in Section 26.4.

The purpose of the request is to allow Waterford 3 to extend the provision in 10 CFR 26.207(d) for pre-defined entry and exit conditions related to severe wind events such as hurricanes. The sequestering of plant personnel may be necessary at times prior to and following the current entry and exit conditions in Section 26.207(d) owing to unsafe travel conditions and potential civil travel restrictions.

The NRC staff performed a preliminary review of the exemption request. The licensee's responses to the following request for additional information will allow the staff to complete its review in a timely manner.

1. In Section 3 of the Proposed Exemption, the first paragraph states that Entergy has hurricane readiness and response procedures. Please provide these procedures and supporting documents, as discussed in the telephone call.
2. Please provide the fleet procedure EN-EP-309, "Fatigue Management for Hurricane Response Activities," mentioned in Section 3 paragraph two of the exemption request,
3. Under the Administrative Controls subheading in Section 3, please provide the reference used to justify the specific procedure guidance that address site-wide announcements, pre-established schedules and bunking.
4. Section 4 of the exemption request mentions not modifying activities being performed that assure safe operation and maintaining the security of the facility. Please explain how fatigue management is addressed in these activities.
5. Section 4 of the exemption request states that sufficient numbers of management and supervision will be available to ensure that the public health and safety is adequately protected. Please describe the roles and duties of the management and supervision that will be performing these duties.
6. The exemption request mentions onsite relief personnel and bunking accommodations that will be in effect through the duration of the proposed exemption. Please elaborate the defined work schedule and restorative rest time for personnel using these designated bunk areas.
7. Given the event that personnel are being sequestered under the requested exemption, please explain how the management will ensure those individuals are not fatigued on the first day reporting back to work after the proposed exemption is exited.
8. Please provide a breakdown of the various job duty groups and numbers of individuals in each group who will be sequestered.

9. Please clarify if the exemption request is for sequestered individuals performing storm related functions and not for discretionary maintenance or the direction of discretionary maintenance that a risk informed evaluation process has determined to be significant to the public health and safety referenced by 10 CFR 26.4(4).
10. Please elaborate on the criteria that will be used to understand that sufficient relief crews are available to restore normal shift rotation.

E-mail Properties

Mail Envelope Properties ()

Subject: Waterford 3 Exemption Request, TAC No. 4016. Request for Additional Information
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From: Kalyanam, Kaly

Created By: Kaly.Kalyanam@nrc.gov

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Tracking Status: None
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