



December 10, 2010

L-2010-292
10 CFR 26.9
10 CFR 26.205

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Response to Request for Additional Information -
Request for Exemption from Certain Requirements
of the Fitness for Duty Rule for Managing Fatigue

By letter L-2009-217 dated October 16, 2009, Florida Power and Light Company (FPL) requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue. Specifically, the letter requested exemption from certain specified requirements of Part 26 during preparations for severe weather conditions (i.e., tropical storm or hurricane force winds) and the recovery from severe weather conditions.

On February 19, 2010, the NRC issued a request for additional information regarding the exemption request, and FPL responded to those RAIs via letter L-2010-051 on March 11, 2010.

On September 9, 2010, the NRC issued another RAI (ML102450022), and FPL responded to those RAIs via letter L-2010-206 on September 16, 2010.

On November 12, 2010, the NRC issued another RAI (ML103160140). The attachment to this letter provides the requested information.

If there are any questions regarding this request, please contact Eric Katzman at (772) 467-7734.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard L. Anderson', written over a horizontal line.

Richard L. Anderson
Site Vice President
St. Lucie Plant

Attachments

A022
NRR

Response to Request for Additional Information Regarding Exemption Request from Certain Requirements of 10 CFR 26

The licensee's letter dated September [2] 16, 2010, includes a response to an NRC request for additional information. The responses to NRC questions 1 and 2 include the phrase "and they have had sufficient time off to reset their work hour clock." The response to NRC question 4 has a similar reference to a reset of a work hour clock. These phrases are in regard to the criteria that Senior Management/Emergency Coordinator will use to reestablish work hour controls.

- a. Please clarify what is meant by the phrase "reset their work hour clock"
- b. Please provide the criteria used to verify that a reset is established.

FPL Response to a

Clarify what is meant by the phrase "reset their work hour clock."

The individual's work hour clock is considered reset when the individual has had a minimum of a 10-hour break prior to the start of the first shift following exiting the exemption. In addition, the minimum day-off requirement (10 CFR 26.205(d)(3)) is considered reset.

FPL Response to b

Provide the criteria used to verify that a reset is established.

The individual's work hour clock is considered reset when the individual has had a minimum of a 10-hour break prior to the start of the first shift following exiting the exemption. The minimum day-off requirement (10 CFR 26.205(d)(3)) is reset and the forward shift schedules must be designed to meet the minimum day-off requirements.

FPL notes that the above responses are consistent with the South Texas Project NRC Fatigue Rule exemption request SER (ML101690107) dated 7/2/2010 (page 8):

Returning to Work Hour Controls

The licensee must return to work hour controls when the EOF Director determines that adequate staff is available to meet the 10 CFR 26.205(c) and (d) requirements. Upon exiting the exemption, all work hour controls will apply. The individuals must have had a minimum of a 10-hour break prior to the start of the first shift following exiting the exemption. The minimum day-off requirement (10 CFR 26.205(d)(3)) is considered reset and the forward shift schedules must be designed to meet the minimum day-off requirements.