

December 30, 2010 (10:15am)



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AREVA

December 30, 2010

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attention: Rulemakings and Adjudications Staff

Reference: Docket ID NRC-2010-0304 - NRC Public Hearing Comments to NEI Petition on Proposed Changes to 10CFR26, Subpart I

Issues/concerns with current rule:

- Time recording inconsistent from site to site
 - Some count travel, badging, etc.; others do not
 - Some want hours worked prior to arrival reported
 - One site actually wanted to know what you did even if you were not working prior to arrival
- Additional resources needed to staff jobs
 - Results in skill dilution to a finite number of highly skilled personnel per crew
 - Vendors not only faced with balancing per shift but also balancing per site (overlapping outages)
 - Difficult to project costs at contract stage
- Classifications (exemptions)
 - Refuel treated differently from site to site
 - Some start out as maintenance and then switch to operations; vendors must go back to ensure 2 days off; should look forward not backward
 - Other sites count as operations from the beginning; more difficult to staff
 - Some sites don't allow going back to maintenance after fuel movement is complete
 - Sometimes people on same crew are classified differently or some are covered and some non-covered
 - Supervisor exemptions vary from site to site
- Dedicated resources needed for tracking hours
 - Must be experts with fatigue rule
 - Difficult since interpretation differs from site to site
- Difficulty keeping days off coordinated during critical activities so that key personnel are available when needed - especially challenging when site schedule slips either way
 - Must coordinate having skilled personnel available
 - Forced to add additional personnel
 - At times, forced to change shifts (which creates additional scheduling issues)
 - Had to stop RVVI due to employee being off - delayed schedule
- At times, must deploy employees early to accommodate MDO
 - Difficult when employees coming from another outage
 - Must schedule arrival just in time for work to begin, especially for fuel movers
 - Arrive for training and then forced to take 2 days off
- At times, must release employees early to allow time off before next outage
- Limiting condition for operation due to an emergent issue - work hour limits impact minimizing risk and equipment remains out of service longer
 - Manways were delayed due to MDO; site off-line longer
 - Difficult scheduling right people to train to recover and when
- Oversight minimized due to fatigue administration
 - Site managers spend time daily on manloading due to changes in schedule; fatigue tools cannot do this
 - Still have same outage pressures (time, schedule, etc.); vendor does what he needs to do to properly prepare for task; less time is spent actually doing the work

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- Leads spend an enormous amount of time on fatigue rule, even more difficult when it varies from site to site
- Leader's administrative duties typically done before/after shift or on day off; limits restrict these activities
- Turnover meetings
 - Cannot do proper turnover in 15 minutes
 - Some utilities encourage turnover inside building; limits adequate time to give complete, efficient turnover for upcoming work
- Just in Time Training
 - Difficult to do
 - Difficult to have all the right people there
 - Sometimes scheduled the day before

Need/impact of NEI proposed rule changes:

- Eliminate MDO requirement
 - Would allow equal treatment of maintenance and operations personnel
 - Allows for consistent scheduling
 - Would help eliminate much of the confusion
- Eliminate definitions of shift cycle and 8-, 10- and 12-hour shift schedules
 - Agree
 - 72-hour rule makes sense
- Eliminate outage duration of 60 days
 - Agree
 - Difficult when outages go past 60 days
- Eliminate specified time for turnover
 - Agree
 - At a minimum, 30 minutes before and after shift
- Eliminate word "unscheduled" in discussion of incidental duties
 - Minimal impact
 - Employees are reluctant to call the right person at times when there are problems

Additional comments/concerns:

- Assume 54-hour average per quarter applies to licensee personnel only
- Common day off could help alleviate some of the current issues
- If outages were scheduled with 2-week break (rather than stacked), the most experienced resources would be available
- Vendors forced to pay for extra days off
- Recommend time recording begin from time on shift; exclude travel and badging
- Utilities push vendors to do cheaper and faster; fatigue rule pushes opposite
- Some utilities considering going to three 10-hour shifts; would require additional resources and turnover meetings
- Difficult to maintain employees when they are only allowed to work 40-50 hours per week; leaving the industry

Sincerely,

Deborah Weaver, Manager
Installed Base Planning

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Rulemaking Comments

From: WEAVER Deborah (AREVA) [Deborah.Weaver@areva.com]
Sent: Thursday, December 30, 2010 7:34 AM
To: Rulemaking Comments
Cc: kjcb@nei.org; GARDNER Ronnie (AREVA); BEAM George (AREVA); MURTHA Beth (AREVA)
Subject: Docket ID NRC-2010-0304
Attachments: Formal NRC Response.doc

In response to Docket ID NRC-2010-0304, attached are AREVA's comments regarding NEI's Petition on proposed changes to 10 CFR Part 26, Subpart I. As requested, comments on issues and concerns with the current rule as well as comments on the proposed rule changes are provided.

Please feel free to contact me with any questions.

Sincerely,

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