



414 Nicollet Mall – MP4  
Minneapolis, MN 55401

February 28, 2011

L-XE-11-003  
10 CFR 26.717(e)

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

Monticello Nuclear Generating Plant  
Docket 50-263  
Renewed Facility Operating License No. DPR-22

Prairie Island Nuclear Generating Plant, Units 1 and 2  
Dockets 50-282 and 50-306  
License Nos. DPR-42 and DPR-60

Fitness For Duty Performance Data

In accordance with 10 CFR 26.717(e), Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (NSPM), hereby submits the Fitness For Duty (FFD) Program Performance Data for Corporate, Monticello Nuclear Generating Plant, and Prairie Island Nuclear Generating Plant (Enclosure 1) as well as data on Work Hour Rule Waivers (Enclosure 2). The report covers the 12-month period ending December 31, 2010.

Summary of Commitments

This letter makes no new commitments or changes to existing commitments.

Gabor Salamon  
Director, Nuclear Licensing and Emergency Preparedness  
Northern States Power Company-Minnesota

Enclosures (2)

cc: Administrator, Region III, USNRC  
Project Manager, Prairie Island, USNRC  
Resident Inspector, Prairie Island, USNRC  
Project Manager, Monticello, USNRC  
Resident Inspector, Monticello, USNRC  
State of Minnesota

**ENCLOSURE 1**

2010 Fitness for Duty Performance Data

6 pages follow

### Fitness for Duty Program Performance Data

**Northern States Power Co - MN**  
 \_\_\_\_\_  
 Company

**Corporate**  
 \_\_\_\_\_  
 Location

**Randall Cleveland**  
 \_\_\_\_\_  
 Contact Name

**December 31, 2010**  
 \_\_\_\_\_  
 Annual period Ending

**612-330-6257**  
 \_\_\_\_\_  
 Phone Number

Cutoffs: Screen/Confirmation (ng/ml) and Alcohol (% BAC)

  X   For types defined in 10 CFR 26.31(d)(4) and at the cutoff levels identified in 26.163 (including the special analysis of dilute specimens permitted under 26.163(a)(2)) and 26.103

| Testing Results                       | Licensee Employees |            | Long -Term Contractor personnel |            | Short -Term Contractor Personnel |            |
|---------------------------------------|--------------------|------------|---------------------------------|------------|----------------------------------|------------|
|                                       | # Tested           | # Positive | # Tested                        | # Positive | # Tested                         | # Positive |
| Average number with Unescorted Access | 278                |            | N/A                             |            | 83                               |            |
| Pre-badging                           | 0                  | 0          |                                 |            | 6                                | 0          |
| For Cause                             | 0                  | 0          |                                 |            | 1                                | 0          |
| Post Accident                         | 0                  | 0          |                                 |            | 0                                | 0          |
| Random                                | 152                | 1          |                                 |            | 48                               | 1          |
| Follow-up                             | 15                 | 0          |                                 |            | 3                                | 0          |
| Total                                 | 167                | 1          |                                 |            | 58                               | 1          |

**Fitness for Duty Program Performance Data (continued)**

**Northern States Power – MN**  
Company

**December 31, 2010**  
Annual period Ending

**Monticello Nuclear Generating Plant**  
Location

**Randall Cleveland**  
Contact Name

**612-330-6257**  
Phone Number

Cutoffs: Screen/Confirmation (ng/ml) and Alcohol (% BAC)

  X   For types defined in 10 CFR 26.31(d)(4) and at the cutoff levels identified in 26.163 (including the special analysis of dilute specimens permitted under 26.163(a)(2)) and 26.103

| Testing Results                       | Licensee Employees |            | Long -Term Contractor personnel |            | Short -Term Contractor Personnel |            |
|---------------------------------------|--------------------|------------|---------------------------------|------------|----------------------------------|------------|
| Average number with Unescorted Access | 504                |            | N/A                             |            | 460                              |            |
| Categories                            | # Tested           | # Positive | # Tested                        | # Positive | # Tested                         | # Positive |
| Pre-badging                           | 41                 | 0          |                                 |            | 616                              | 5          |
| For Cause                             | 0                  | 0          |                                 |            | 2                                | 0          |
| Post Accident                         | 0                  | 0          |                                 |            | 0                                | 0          |
| Random                                | 272                | 0          |                                 |            | 242                              | 2          |
| Follow-up                             | 28                 | 0          |                                 |            | 33                               | 1          |
| Total                                 | 341                | 0          |                                 |            | 893                              | 8          |

**Fitness for Duty Program Performance Data (continued)**

**Northern States Power – MN**  
 Company

**December 31, 2010**  
 Annual period Ending

**Prairie Island Nuclear Generating Plant**  
 Location

**Randall Cleveland**  
 Contact Name

**612-330-6257**  
 Phone Number

Cutoffs: Screen/Confirmation (ng/ml) and Alcohol (% BAC)

X For types defined in 10 CFR Parts 26.31(d)(4) and at the cutoff levels identified in 26.163 (including the special analysis of dilute specimens permitted under 26.163(a)(2)) and 26.103

| Testing Results                       | Licensee Employees |            | Long -Term Contractor personnel |            | Short -Term Contractor Personnel |            |
|---------------------------------------|--------------------|------------|---------------------------------|------------|----------------------------------|------------|
|                                       | # Tested           | # Positive | # Tested                        | # Positive | # Tested                         | # Positive |
| Average number with Unescorted Access | 657                |            | N/A                             |            | 476                              |            |
| Categories                            | # Tested           | # Positive | # Tested                        | # Positive | # Tested                         | # Positive |
| Pre-badging                           | 53                 | 0          |                                 |            | 857                              | 3          |
| For Cause                             | 5                  | 0          |                                 |            | 1                                | 0          |
| Post Accident                         | 0                  | 0          |                                 |            | 1                                | 0          |
| Random                                | 350                | 0          |                                 |            | 254                              | 1          |
| Follow-up                             | 49                 | 1          |                                 |            | 55                               | 0          |
| Total                                 | 457                | 1          |                                 |            | 1168                             | 4          |

### Breakdown of Confirmed Positive Tests

| <b>Corporate</b>        | Marijuana | Cocaine | Opiates | Amphet-<br>amines | Phency-<br>clidine | Alcohol | Refusal<br>to Test |
|-------------------------|-----------|---------|---------|-------------------|--------------------|---------|--------------------|
| Licensee Employees      | 0         | 0       | 0       | 1                 | 0                  | 0       | 0                  |
| Short -Term Contractors | 1         | 0       | 0       | 0                 | 0                  | 0       | 0                  |
| Total                   | 1         | 0       | 0       | 1                 | 0                  | 0       | 0                  |
| <b>Monticello</b>       |           |         |         |                   |                    |         |                    |
| Licensee Employees      | 0         | 0       | 0       | 0                 | 0                  | 0       | 0                  |
| Short-Term Contractors  | 5         | 0       | 0       | 0                 | 0                  | 3       | 0                  |
| Total                   | 5         | 0       | 0       | 0                 | 0                  | 3       | 0                  |
| <b>Prairie Island</b>   |           |         |         |                   |                    |         |                    |
| Licensee Employees      | 0         | 0       | 0       | 0                 | 0                  | 1       | 0                  |
| Short-Term Contractors  | 2         | 0       | 0       | 1                 | 0                  | 1       | 1                  |
| Total                   | 2         | 0       | 0       | 1                 | 0                  | 2       | 1                  |

NSPM conducted 37 tests of dilutes using the special analysis of dilute specimens permitted under 10 CFR 26.163(a)(2). One of these tests, profiled below under management actions, resulted in a positive. One (1) individual tested invalid on a Prairie Island pre-access test.

### Fitness For Duty Summary

#### Management Actions

- During the annual period ending December 31, 2010, Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant conducted 3,084 drug and alcohol tests in accordance with 10 CFR Part 26. Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant workers subject to random drug and alcohol testing are assigned to one of three pools: Prairie Island, Monticello, and Corporate Office. Random test rates for each pool for the annual period ending December 31, 2010 are as follows:

| POOLS          | Annual Period<br>Ending 12/31/10 |
|----------------|----------------------------------|
| Corporate      | 55%                              |
| Monticello     | 53%                              |
| Prairie Island | 53%                              |
| ALL            | <b>54%</b>                       |

### **Fitness For Duty Summary (continued)**

For the 12-month reporting period ending December 31, 2010, fifteen (15) workers were denied nuclear access after testing positive for drugs or alcohol and one (1) worker was denied access for refusal to drug and alcohol test. By test type: eight (8) pre-access tests were positive, two (2) follow-up tests were positive, five (5) random tests were positive and one (1) was a refusal to test.

#### **Pre-Access Positives**

Two (2) contractor employees tested positive for alcohol.  
One (1) contractor employee tested positive for amphetamines.  
Five (5) contractor employees tested positive for marijuana. One of the positives was the result of the special analysis of dilute specimens permitted under 10 CFR 26.153(a)(2).

The individuals listed above were denied access to NSPM nuclear facilities.

#### **Follow-up Positives**

One (1) contractor employee tested positive for alcohol.

One (1) licensee employee tested positive for alcohol.

Both individuals listed above were denied access to NSPM nuclear facilities.

The licensee employee was subsequently reinstated following a determination of fitness for duty, including the establishment of appropriate follow-up requirements.

#### **Random Positives**

Three (3) contractor employees tested positive for marijuana.

One (1) contractor employee tested positive for alcohol.

One (1) licensee employee tested positive for amphetamines.

The individuals listed above were denied access to NSPM nuclear facilities.

2. For the annual period referenced herein all blind specimens submitted to Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant's HHS-certified laboratory yielded expected results.

## Waivers

For the reporting period ending December 31, 2010, Monticello and Prairie each had Four (4) waivers of the work hour controls specified in 10 CFR 26.205(d)(1) through (d)(5)(i) for individuals described in 10 CFR 26.4(a). A detailed breakdown of the waivers by NSPM site is included in Enclosure 2.

## Reportable Events

There were two (2) reportable events in the 12-month period ending December 31, 2010.

One (1) supervisor tested positive on a follow-up alcohol test.

One (1) supervisor refused to complete a random drug test.

**ENCLOSURE 2**

2010 Work Hour Rule Waivers

2 pages follow



**U.S. NRC**  
United States Nuclear Regulatory Commission

Protecting People and the Environment

# Electronic Information Exchange

## NRC FFD Program Performance Data Reporting System 10 CFR Part 26, Subpart I - Managing Fatigue Annual Fatigue Reporting Form for the EIE General Submission

Select Facility:  Period of Report (Read-only):  Note: Use Adobe Reader 8 or later for this form to work properly.

Submission Update - check this box only if this is an update to a previous submission.

Was there an outage for any part of the reporting period? (Yes / No)  Did any single site outage last more than 60 days in total? (Yes / No)  Did any of the first 60 days of an outage occur during the reporting period? (Yes / No)  Did any of the outage days after day 60 occur during the reporting period? (Yes / No)

### Summary of Waiver Issuance - 26.203(e)(1)(i)-(ii)

Number of Waivers Issued [Note: Even if no waivers were issued, please enter a value (e.g., 0) in at least one of the cells in this table]

| Work Hour Controls                                                                                       | Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)                        |                    |                       | Performing health physics or chemistry duties, as described in 26.4(a)(2) |                    |                       | Performing duties of a fire brigade member, as described in 26.4(a)(3)* |                    |                       | Performing maintenance or on-site directing of maintenance, as described in 26.4(a)(4) |                    |                       | Performing security duties, as described in 26.4(a)(5) |                    |                       | Operating Total (Calculated) | Outage Total (Days 1-60) (Calculated) | Outage Total (After Day 60) (Calculated) | Combined Total (Calculated) |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------|-----------------------|---------------------------------------------------------------------------|--------------------|-----------------------|-------------------------------------------------------------------------|--------------------|-----------------------|----------------------------------------------------------------------------------------|--------------------|-----------------------|--------------------------------------------------------|--------------------|-----------------------|------------------------------|---------------------------------------|------------------------------------------|-----------------------------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
|                                                                                                          | Operating                                                                                                      | Outage (days 1-60) | Outage (after day 60) | Operating                                                                 | Outage (days 1-60) | Outage (after day 60) | Operating                                                               | Outage (days 1-60) | Outage (after day 60) | Operating                                                                              | Outage (days 1-60) | Outage (after day 60) | Operating                                              | Outage (days 1-60) | Outage (after day 60) |                              |                                       |                                          |                             |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
| Daily Work Hours<br>26.205(a)(1)                                                                         | Exceeded 16 work hrs in any 24 hr period                                                                       |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Exceeded 28 work hrs in any 48 hr period                                                                       |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Exceeded 72 work hrs in any 7 day period                                                                       |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Rest Breaks<br>26.205(a)(2)                                                                              | Less than 10 hr break between successive work periods (or 8 hr break accommodating scheduled transition shift) |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Less than 34 hr break in any 9 day period                                                                      |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Minimum Days Off Per Shift Cycle<br>26.205(a)(3)                                                         | Average of less than 1 day off per week for 8-hour shifts                                                      |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Average of less than 2 days off per week for 10-hour shifts                                                    |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Average of less than 2.5 days off per week for 12-hour shifts                                                  |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Average of less than 3 days off per week for 12-hour security shifts                                           |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Minimum Days Off for Outage Activities (during first 60 days of outage)<br>26.205(a)(4) and 26.205(a)(5) | Less than 3 days off per successive 15-day period                                                              |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|                                                                                                          | Less than 4 days off per successive 15-day period for security personnel                                       |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       |                                          | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| <b>Total</b>                                                                                             |                                                                                                                |                    |                       |                                                                           |                    |                       |                                                                         |                    |                       |                                                                                        |                    |                       |                                                        |                    |                       |                              |                                       | 0                                        | 0                           | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |   |

\* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

### Distribution of Waivers for Individuals in Each Category - 26.203(e)(1)(iii)

Number of Employees Issued Waivers  
[Note: Even if no waivers were issued for a given column, please enter a value (e.g., 0) in at least one of the cells in the column]

| Number of Waivers                                   | Operating or on-site directing of the operations of systems, as described in 26.4(a)(1) | Performing health physics or chemistry duties as described in 26.4(a)(2) | Performing duties of a fire brigade member as described in 26.4(a)(3)* | Performing maintenance or on-site directing of maintenance as described in 26.4(a)(4) | Performing security duties as described in 26.4(a)(5) |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------|
| 1                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 2                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 2                                                                                     | 0                                                     |
| 3                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 4                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 5                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 6                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 7                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 8                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 9                                                   | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 10                                                  | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| 11 - 20                                             | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| More than 20                                        | 0                                                                                       | 0                                                                        | 0                                                                      | 0                                                                                     | 0                                                     |
| <b>Total Employees Issued Waivers (Excluded)</b>    | 0                                                                                       | 0                                                                        | 0                                                                      | 2                                                                                     | 0                                                     |
| <b>Most Waivers Provided to a Single Individual</b> | 0                                                                                       | 0                                                                        | 0                                                                      | 2                                                                                     | 0                                                     |

\* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

### Person(s) Responsible for Information Provided

Person 1 (Required):  First Name  Last Name  Position Title  Email Address

Person 2 (Optional):  First Name  Last Name  Position Title  Email Address

**Final Step (Required)** - NRC will consider this form an official submission only when the "Validate & Lock" button has been selected and all errors (if any, those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" when the data validation process has been successfully completed and the form is ready for submission.

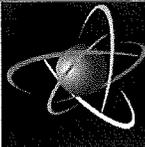
### Summary of Corrective Action - 26.203(e)(2) (as)

**Analysis of Waiver Assessment Data (Limit 10,000 characters)**  
Waivers were written for two (2) individuals who were qualified to perform work necessary to mitigate a condition known to exist.

**Analysis of Fatigue Assessment Data (Limit 10,000 characters)**  
Fatigue assessments performed prior to issuance of the waivers did not identify a fatigue concern. A subsequent review of the fatigue assessments related to the waivers identified the factors to properly document the results of the fatigue assessment on the required fatigue management program form.

**Conclusions (Limit 10,000 characters)**  
Waivers were appropriately granted with opportunities to improve documentation of fatigue assessments.

**Summary and Status of Corrective Actions (Limit 10,000 characters)**  
To ensure proper documentation of fatigue assessments, the program waiver form is being enhanced to require a sign-off that the waiver related fatigue assessment is documented using the program fatigue assessment form.



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# Electronic Information Exchange

## NRC FFD Program Performance Data Reporting System 10 CFR Part 26, Subpart I - Managing Fatigue Annual Fatigue Reporting Form for the EIE General Submission

Select Facility:  Period of Report (Read only):  *Make Use Adobe Reader 8 or later for this form to work properly.*

Submission Update - check this box only if this is an update to a previous submission.

Was this facility in an outage for any part of the reporting period? (Yes / No)

Did any single site outage last more than 60 days in total? (Yes / No)

Did any of the first 60 days of an outage occur during the reporting period? (Yes / No)

Did any of the outage days after day 60 occur during the reporting period? (Yes / No)

### Summary of Waiver Issuance - 26.203(e)(1)(i-ii)

Number of Waivers Issued [Note: Even if no waivers were issued, please enter a value (e.g., 0) in at least one of the cells in this table]

| Work Hour Controls                                                                                       | Operating or on-site directing of the operations of systems as described in 26.4(a)(1)                         |                                |                                | Performing health physics or chemistry duties, as described in 26.4(a)(2) |                                |                                | Performing duties of a fire brigade member as described in 26.4(a)(3)* |                                |                                | Performing maintenance or on-site direction of maintenance, as described in 26.4(a)(4) |                                |                                | Performing security duties, as described in 26.4(a)(5) |                                |                                | Operating Total (Calculated)   | Outage Total (days 1-60) (Calculated) | Outage Total (after day 60) (Calculated) | Combined Total (Calculated) |
|----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------|---------------------------------------------------------------------------|--------------------------------|--------------------------------|------------------------------------------------------------------------|--------------------------------|--------------------------------|----------------------------------------------------------------------------------------|--------------------------------|--------------------------------|--------------------------------------------------------|--------------------------------|--------------------------------|--------------------------------|---------------------------------------|------------------------------------------|-----------------------------|
|                                                                                                          | Operating                                                                                                      | Outage (days 1-60)             | Outage (after day 60)          | Operating                                                                 | Outage (days 1-60)             | Outage (after day 60)          | Operating                                                              | Outage (days 1-60)             | Outage (after day 60)          | Operating                                                                              | Outage (days 1-60)             | Outage (after day 60)          | Operating                                              | Outage (days 1-60)             | Outage (after day 60)          |                                |                                       |                                          |                             |
| Daily Work Hours<br>26.205(a)(1)                                                                         | Exceeded 16 work hrs in any 24 hr period                                                                       | <input type="text" value="1"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Exceeded 20 work hrs in any 48 hr period                                                                       | <input type="text" value="1"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Exceeded 72 work hrs in any 7 day period                                                                       | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
| Rest Breaks<br>26.205(a)(2)                                                                              | less than 10 hr break b/w successive work periods for 8 hr break accommodating scheduled transition b/w shifts | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | less than 34 hr break in any 9 day period                                                                      | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
| Minimum Days Off Per Shift Cycle<br>26.205(a)(3)                                                         | Average of less than 1 day off per week for 8-hour shifts                                                      | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Average of less than 2 days off per week for 10-hour shifts                                                    | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Average of less than 2.5 days off per week for 12-hour shifts                                                  | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Average of less than 2 days off per week for 12-hour maintenance shifts                                        | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
| Minimum Days Off for Outage Activities (during first 90 days of outage)<br>26.205(a)(4) and 26.205(a)(5) | less than 3 days off per successive 15-day period 26.205(a)(4)                                                 | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Less than 1 day off per 7-day period for maintenance personnel 26.205(a)(4)                                    | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
|                                                                                                          | Less than 4 days off per successive 15-day period for security personnel 26.205(a)(5)                          | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |
| <b>Total</b>                                                                                             | <input type="text" value="2"/>                                                                                 | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                            | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                                                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>                         | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/> | <input type="text" value="0"/>        | <input type="text" value="0"/>           |                             |

\*NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

### Distribution of Waivers for Individuals in Each Category - 26.203(e)(1)(iii)

Number of Employees Issued Waivers  
[Note: Even if no waivers were issued for a given column, please enter a value (e.g., 0) in at least one of the cells in the column]

| Number of Waivers                                   | Operating or on-site directing of the operations of systems as described in 26.4(a)(1) | Performing health physics or chemistry duties as described in 26.4(a)(2) | Performing duties of a fire brigade member as described in 26.4(a)(3)* | Performing maintenance or on-site directing of maintenance as described in 26.4(a)(4) | Performing security duties as described in 26.4(a)(5) |
|-----------------------------------------------------|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------|
| 1                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 2                                                   | <input type="text" value="1"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="1"/>                        |
| 3                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 4                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 5                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 6                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 7                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 8                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 9                                                   | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 10                                                  | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| 11 - 20                                             | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| More than 20                                        | <input type="text" value="0"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="0"/>                        |
| <b>Total Employees Issued Waivers (Calculated)</b>  | <input type="text" value="1"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="1"/>                        |
| <b>Most Waivers Provided to a Single Individual</b> | <input type="text" value="2"/>                                                         | <input type="text" value="0"/>                                           | <input type="text" value="0"/>                                         | <input type="text" value="0"/>                                                        | <input type="text" value="2"/>                        |

\*NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

### Person(s) Responsible for Information Provided

Person 1 (required):

Person 2 (optional):

Final Step (Required) - NRC will consider this form an official submission only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

### Summary of Corrective Action - 26.203(e)(2) (as required)

Analysis of Waiver Assessment Data (Limit 10,000 characters)  
Waivers for two (2) individuals were written to ensure minimal shift complement for operation security positions in response to sudden and unforeseen illness.

Analysis of Fatigue Assessment Data (Limit 10,000 characters)  
Fatigue assessments were properly completed and did not identify the need for additional fatigue controls.

Conclusions (Limit 10,000 characters)  
Waivers and related fatigue assessments effectively addressed fatigue concerns for the work hour controls exceeded.

Summary and Status of Corrective Actions (Limit 10,000 characters)  
Waiver and fatigue assessments effectively implemented and entered into corrective action program for tracking.