

NRR-PMDAPEm Resource

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Subject: Latest Version of the draft guidance for June 1 meeting
Attachments: Implementation guidance for 54 hr averaging interim relief Rev A10.pdf; Implementation guidance for 54 hr averaging interim relief Rev A10final.pdf

Mike,

Attached is the latest version of the draft guidance. There are two files, one showing markups and one final. The comments reflect the comments we submitted on the proposed rule. You will see that we expanded the description of the issues and added a number of examples to illustrate the application of the guidance.

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Implementation Guidance for Alternative Maximum Average Work Hours Approach 26.205(d)(7)

Maximum Average Work Hours Approach- the proposed alternative approach to on-line MDO is a weekly average of 54 hours worked, calculated based on a rolling averaging period of up to 6 weeks. ~~The calculation of the weekly average must be performed on a rolling basis with a rolling period of 7 days.~~ This alternative is applicable to all covered workers.

Implementation Guidance

General:

The transition from minimum days off to a 54 hr/week averaging approach provides additional flexibility in the scheduling of work hours. This flexibility is needed to enable the restoration of safety beneficial practices that had been adversely impacted due to the rigidity of the minimum days off provisions of the rule. The additional flexibility gained reduces the number of mandatory days off and days off are instrumental in managing fatigue. It remains the licensee's responsibility to schedule hours consistent with the objective of preventing impairment from fatigue.

For example, ~~while it is possible~~ without the requirement for minimum days off it would be possible to work every day during an averaging period with the exception of the break days required by ~~10 CFR~~ 26.205(d)(2), ~~however, this it~~ may not be consistent with the requirements of 26.205(c) for scheduling individual's work with the objective of preventing impairment from fatigue ~~to do so (ref: 10 CFR 26.205(c)).~~

Averaging Periods:

The duration of the averaging period may be consistent with standard shift schedules but may not be greater than 6 weeks.

The averaging period starts "rolling" after a work history for a worker has been established equal to the length of the averaging period. The averaging period rolls by one week at a time. This means that the maximum average work hour calculation must be performed weekly at the time established by the licensee for rolling to the next week. Each licensee has the discretion to establish the point in time during the week when the ~~rolling~~ week ~~begins and ends~~ rolls to the next week.

Shifts that bridge the end of the ~~rolling period~~ established week may be counted in one of two ways:

- The hours for aAny shift that bridges the end of the week may ~~be all be counted included~~ in the week the shift starts, or
- The hours may be included in the week they are worked.

A licensee must document in their procedures required by 26.27 and 26.203 the point in time when the week rolls to the next week and which of the two options they are using for counting the shifts that bridge the end of the established week they select.

Example 1: An operator works a rotating shift that repeats after 5 weeks so the licensee has elected to establish an averaging period for Operations at 5 weeks. The licensee has selected Sunday at 0000 as the end of the week so their rolling week is Sunday at 0000 to Sunday at 0000. This operator is just starting covered work so the first maximum average work hour calculation would occur Sunday at 0000 at the end of his 5th week. The next Sunday at 0000 the next calculation would be performed that would encompass weeks 2 through 6. This calculation would continue to be performed each Sunday at 0000 covering the previous 5 weeks.

The Saturday night shift begins at 1800 and ends at 0600 Sunday. The licensee has chosen to include the hours from that shift as all belonging to the week the shift starts so the calculation done Sunday at 0000 each week includes the 6 hours that are to be worked on Sunday morning. The licensee's procedures required by 26.27 and 26.203 specify the start and stop times of the week and the method used for counting shifts that bridge the end of the established week.

While the calculation of the maximum average work hour limit occurs at the end of the averaging period, there is a need to be continually calculating the average looking forward to identify potential exceedances of the limit so that the work hours can be appropriately adjusted or, as needed, waivers can be prepared and fatigue assessments conducted in advance of exceeding the limit.

Partial Averaging Periods:

Partial averaging periods occur when a worker will not be working a full averaging period. There are two cases that must be addressed related to partial averaging periods. The first is a partial week in which case the worker will not be working a full week as established by the licensee (in Example 1 the week was established by the licensee as being from Sunday at 0000 to Sunday at 0000). The work hour limits that apply to a partial week are ~~if a partial week (i.e., less than 7 days) is to be worked before starting an averaging period or at the end of an averaging period, the limits of 26.205(d)(1) and (2) apply to that partial week. Because this is not a full work week, the hours worked in this partial week are not included in the calculation of the work hour average completed per 26.207(d)(7)(i).~~

~~This would apply to a worker coming out of an outage and going back to normal operations, a worker transitioning from uncovered to covered work, a worker going from covered to uncovered work, etc.~~

Example 2: The operator in Example 1 starts his first shift on Wednesday. Since the week has been established by the licensee as being from Sunday at 0000 to Sunday at 0000 the operator will start out with a partial week. The work hour limits that apply to him from Wednesday to Sunday at 0000 are the limits of 26.205(d)(1) and (2).

Example 3: The licensee in Example 1 exits a unit outage on Tuesday and a worker who had been working outage minimum days off returns to on-line hours on Thursday. For the partial week from Thursday to Sunday at 0000 the worker would work under the limits of 26.205(d)(1) and (2) taking into account the outage hours worked that week.

The second partial averaging case that must be addressed is for a worker who will not be working a full averaging period but will be working as a covered worker one or more full weeks as established by the licensee. ~~than 6 days (e.g., an outage worker arrives on site and will be working 2 weeks prior to the start of an outage),~~ the worker must average 54 hrs/week or less for the partial averaging period averaged over the number of full weeks worked.

Example 4: An outage worker arrives on site and begins as a covered worker on Wednesday, two and a half weeks before the outage which starts at 0000 on Sunday. For the partial week from Wednesday to Sunday at 0000 the work hour limits of 26.205 (d)(1) and (2) apply. For the two full weeks worked the hours over those two weeks must average 54 hours per week or less.

Beginning a Rolling Averaging Period:

In the case of a worker who has not been performing on-line covered work and will be transitioning to on-line covered work, there are two options:

- 1) The schedule established for the worker for the initial averaging period ~~of up to 6 weeks~~ can be set up as a fixed period which averages 54 hours or less. The first week after the initial averaging period is the first rolling week.
- 2) The averaging period for the worker is determined and the hours for the past work weeks equal to this averaging period are ~~determined~~ calculated to establish the history needed to begin ~~the rolling period~~.

Example 5: An operator just received his license and to celebrate took a month long vacation. Since he has no work history, the schedule for his initial averaging period of 5 weeks needs to be established such that when the first averaging calculation is performed on Sunday at 0000 at the end of the 5th week of on line work, it averages 54 hrs/wk or less.

Example 6: An operator is coming back on shift after working in Operations Support as a procedure writer for the past year. Since his hours for the past 5 weeks are known and averaged less than 54 hours per week, his work history can be established and his work hour average can be calculated at 0000 on Sunday at the end of his first week he is back on shift and each Sunday at 0000 following.

NEI 06-11, Section 7.3-Transition onto a shift or between covered groups or into a covered group:

Section 7.3 provides the guidance for meeting 26.205(b)(3). That guidance addresses how to ensure that individuals work hour, break and minimum days off requirements are met prior to beginning or resuming covered duties. This determination must be made before entering the section above for Beginning a Rolling Averaging Period. This guidance currently addresses ensuring the proper number of minimum days off has occurred in the last 7 day period. For the purposes of applying this guidance to the maximum average work hour alternative, instead of ensuring that individuals have the appropriate minimum days off, the licensee should ensure that the individuals have worked less than or equal to 54 hrs in the preceding 7 day period.

Example 7: A worker has worked the following schedule as an uncovered worker. The following Monday he is going to begin covered work. Since he meets the work hour and

break limits, including having a 34 hour break in the last 9 days, and has worked less than or equal to 54 hours in the last week, he meets the requirements to transition to covered work.

<u>S</u>	<u>M</u>	<u>T</u>	<u>W</u>	<u>T</u>	<u>F</u>	<u>S</u>
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	
	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	

Truncated Averaging Periods (these apply only to Item 1 above under Beginning a Rolling Averaging Period):

In the case where a fixed schedule has been set up for a worker to establish the history needed to begin the rolling averaging period, unforeseeable events could cause that schedule to be truncated prematurely due to events largely outside of the licensee's control. When such an event occurs, the licensee shall be considered to be in compliance with the rule if the schedule for the averaging period would have met the maximum average work hour limit had it not been truncated. Examples of events that could lead to unforeseeable truncation of the period are: Covered individuals need not meet the requirement to average not more than 54 hours of work per week during averaging periods that are truncated for the following reasons:

- An unexpected unit outage,
- A declared emergency, as defined in the licensee's emergency plan, or
- A covered worker ~~is unexpectedly~~ has to be moved to uncovered duties
- Duties with the licensee are terminated ~~unexpectedly~~
- An unplanned security system outage (security only)
- An increased threat condition (security only)

Following a truncated averaging period a licensee may:

- Start a new averaging period, or
- Choose not to truncate the averaging period

Extended absence:

An extended absence (e.g., vacations, short-term disability) is not considered an interruption or truncation of an averaging period but is considered part of the averaging period.

Example 8: A plant electrician is in her third week of her initial averaging period when she injures her knee while running at home. She is ordered to be on light duty for a period of time forcing her supervisor to move her to an office position that is not covered work. At the point when she left her covered duties her calculated work average would have been 60 hrs per week but her future schedule for the remainder of the first averaging period would have resulted in her average at the end of the period being 48 hrs/wk. The licensee in this case would be considered to be in compliance with the rule.

Example 9: A security officer is in the 4th full week of their initial averaging period when he notifies his supervisor he is resigning. At the point when he left the position as a covered worker his work hour average for the first 3 weeks of the averaging period was 56 hrs/week

but the average for the entire averaging period would have been 52 hrs/week had he completed the initial averaging period. The licensee in this case would be considered to be in compliance with the rule.

If the licensee truncates an initial averaging period of their own volition, then the worker needs to meet the 54 hr/wk limit for the weeks worked.

Force-on-force tactical exercises:

The rule permits licensees who implement the proposed alternative during non-outage periods to exclude from the proposed 26.205(d)(7) calculations the hours worked by security personnel during the actual conduct of NRC-evaluated force-on-force tactical exercises. In practice, licensees should exclude from the calculation of hours worked during the actual conduct of NRC-evaluated force-on-force tactical exercises only those hours worked in excess of 54 hours during the week of the exercise.

NEI 06-11, Section 7.5, Reset from Deviations ~~NEI 06-11 Section 7.5:~~

Section 7.5 provides guidance on how to restore a person to compliance with work hour requirements when a deviation from those requirements has occurred. This guidance currently ensures actions are in place to meet the minimum day off requirements for the current shift cycle. For the purposes of applying this guidance to the maximum average work hour alternative, instead of An alternative to ensuring that the individual will meet minimum day off requirements, the licensee should ~~is to~~ ensure they will meet the maximum average work hours requirement for the current averaging period.

Example 10: A worker is a covered worker with a 5 week averaging period. They worked the schedule below for weeks T-1 through T-5. The 72 hour work week in week T-5 has caused a deviation of the maximum average work hour requirement. To reset from this deviation, they are limited to 30 hours in week T to return to compliance with the maximum average work hour requirement.

<u>Week T-5</u>	<u>40</u>	<u>Work Hr Average</u>
<u>Week T-4</u>	<u>60</u>	
<u>Week T-3</u>	<u>60</u>	
<u>Week T-2</u>	<u>48</u>	
<u>Week T-1</u>	<u>72</u>	<u>56</u>
<u>Week T</u>	<u>30</u>	<u>54</u>

Guidance for Changing from MDO to the Maximum Average Work Hours Approach

~~In order to transition from Minimum Days Off to the maximum average work hours approach for covered workers who have been in compliance with the on-line minimum day off provisions of the rule, a transition can be made directly into the 54 hr rolling average by determining the hours worked for the past 5 weeks (in the case of a 6 week rolling period). The available work hours for the next week (first rolling week) can be determined in order to comply with the 54 hr average over the 6 week rolling period. For those workers who are transitioning into covered work, the guidance for beginning a rolling averaging period above should be used.~~

~~Example: The rolling weeks have been set up to begin and end at midnight on Saturday nights. The transition from MDO to the 54 hr average limit will occur this coming Saturday night. An operator on a 5 week shift cycle on line will have worked 204 hrs over the 4 weeks preceding Saturday at midnight. Therefore, for the next week that operator can work $270 - 204 = 66$ hrs the coming week and be in compliance with the 54 hr average.~~

Waivers for 26.205(d)(7) Work Hour Controls

Licensees may issue waivers in accordance with 26.207 for workers to exceed the maximum average of 54 hours/week. If a waiver is issued for this control limit, a new fatigue assessment must be conducted for each work period while the worker is in excess of the limit.

Example 11: A worker has the following schedule, and emergent work is necessary to mitigate or prevent a condition adverse to safety on the Friday and Saturday of the last week such that the weekly average will be 58 hours/week. Only one waiver would be required and would be reported as one waiver of the maximum average 54 in the annual FFD report required per 26.203(e). However, the worker must be evaluated for fatigue by a face-to-face supervisory assessment no more than 4 hours before work is conducted for both work periods.

<u>Original Schedule – AVG54 compliant</u>						
<u>S</u>	<u>M</u>	<u>T</u>	<u>W</u>	<u>H</u>	<u>F</u>	<u>S</u>
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	
	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	
	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>12</u>	
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	
	<u>10</u>	<u>10</u>	<u>12</u>	<u>12</u>	<u>10</u>	
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>		

<u>Modified Schedule – Waivers Required</u>						
<u>S</u>	<u>M</u>	<u>T</u>	<u>W</u>	<u>H</u>	<u>F</u>	<u>S</u>
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	
	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	
	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>12</u>	
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	
	<u>10</u>	<u>10</u>	<u>12</u>	<u>12</u>	<u>10</u>	
	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>	<u>12</u>

Implementation Guidance for Alternative Maximum Average Work Hours Approach 26.205(d)(7)

Maximum Average Work Hours Approach- the proposed alternative approach to on-line MDO is a weekly average of 54 hours worked, calculated based on a rolling averaging period of up to 6 weeks. This alternative is applicable to all covered workers.

Implementation Guidance

General:

The transition from minimum days off to a 54 hr/week averaging approach provides additional flexibility in the scheduling of work hours. This flexibility is needed to enable the restoration of safety beneficial practices that had been adversely impacted due to the rigidity of the minimum days off provisions of the rule. The additional flexibility gained reduces the number of mandatory days off and days off are instrumental in managing fatigue. It remains the licensee's responsibility to schedule hours consistent with the objective of preventing impairment from fatigue.

For example, without the requirement for minimum days off it would be possible to work every day during an averaging period with the exception of the break days required by 26.205(d)(2), however, this may not be consistent with the requirements of 26.205(c) for scheduling individual's work with the objective of preventing impairment from fatigue.

Averaging Periods:

The duration of the averaging period may be consistent with standard shift schedules but may not be greater than 6 weeks.

The averaging period starts "rolling" after a work history for a worker has been established equal to the length of the averaging period. The averaging period rolls by one week at a time. This means that the maximum average work hour calculation must be performed weekly at the time established by the licensee for rolling to the next week. Each licensee has the discretion to establish the point in time during the week when the week rolls to the next week.

Shifts that bridge the end of the established week may be counted in one of two ways:

- The hours for any shift that bridges the end of the week may all be included in the week the shift starts, or
- The hours may be included in the week they are worked.

A licensee must document in the procedures required by 26.27 and 26.203 the point in time when the week rolls to the next week and which of the two options they are using for counting the shifts that bridge the end of the established week.

Example 1: An operator works a rotating shift that repeats after 5 weeks so the licensee has elected to establish an averaging period for Operations at 5 weeks. The licensee has selected Sunday at 0000 as the end of the week so their rolling week is Sunday at 0000 to

Sunday at 0000. This operator is just starting covered work so the first maximum average work hour calculation would occur Sunday at 0000 at the end of his 5th week. The next Sunday at 0000 the next calculation would be performed that would encompass weeks 2 through 6. This calculation would continue to be performed each Sunday at 0000 covering the previous 5 weeks.

The Saturday night shift begins at 1800 and ends at 0600 Sunday. The licensee has chosen to include the hours from that shift as all belonging to the week the shift starts so the calculation done Sunday at 0000 each week includes the 6 hours that are to be worked on Sunday morning. The licensee's procedures required by 26.27 and 26.203 specify the start and stop times of the week and the method used for counting shifts that bridge the end of the established week.

While the calculation of the maximum average work hour limit occurs at the end of the averaging period, there is a need to be continually calculating the average looking forward to identify potential exceedances of the limit so that the work hours can be appropriately adjusted or, as needed, waivers can be prepared and fatigue assessments conducted in advance of exceeding the limit.

Partial Averaging Periods:

Partial averaging periods occur when a worker will not be working a full averaging period. There are two cases that must be addressed related to partial averaging periods. The first is a partial week in which case the worker will not be working a full week as established by the licensee (in Example 1 the week was established by the licensee as being from Sunday at 0000 to Sunday at 0000). The work hour limits that apply to a partial week are the limits of 26.205(d)(1) and (2). Because this is not a full work week, the hours worked in this partial week are not included in the calculation of the work hour average completed per 26.207(d)(7)(i).

Example 2: The operator in Example 1 starts his first shift on Wednesday. Since the week has been established by the licensee as being from Sunday at 0000 to Sunday at 0000 the operator will start out with a partial week. The work hour limits that apply to him from Wednesday to Sunday at 0000 are the limits of 26.205(d)(1) and (2).

Example 3: The licensee in Example 1 exits a unit outage on Tuesday and a worker who had been working outage minimum days off returns to on-line hours on Thursday. For the partial week from Thursday to Sunday at 0000 the worker would work under the limits of 26.205(d)(1) and (2) taking into account the outage hours worked that week.

The second partial averaging case that must be addressed is for a worker who will not be working a full averaging period but will be working as a covered worker one or more full weeks as established by the licensee. The worker must average 54 hrs/week or less averaged over the number of full weeks worked.

Example 4: An outage worker arrives on site and begins as a covered worker on Wednesday, two and a half weeks before the outage which starts at 0000 on Sunday. For the partial week from Wednesday to Sunday at 0000 the work hour limits of 26.205 (d)(1) and (2) apply. For the two full weeks worked the hours over those two weeks must average 54 hours per week or less.

Beginning a Rolling Averaging Period:

In the case of a worker who has not been performing on-line covered work and will be transitioning to on-line covered work, there are two options:

- 1) The schedule established for the worker for the initial averaging period can be set up as a fixed period which averages 54 hours or less. The first week after the initial averaging period is the first rolling week.
- 2) The averaging period for the worker is determined and the hours for the past work weeks equal to this averaging period are calculated to establish the history needed to begin rolling.

Example 5: An operator just received his license and to celebrate took a month long vacation. Since he has no work history, the schedule for his initial averaging period of 5 weeks needs to be established such that when the first averaging calculation is performed on Sunday at 0000 at the end of the 5th week of on line work, it averages 54 hrs/wk or less.

Example 6: An operator is coming back on shift after working in Operations Support as a procedure writer for the past year. Since his hours for the past 5 weeks are known and averaged less than 54 hours per week, his work history can be established and his work hour average can be calculated at 0000 on Sunday at the end of his first week he is back on shift and each Sunday at 0000 following.

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Section 7.3 provides the guidance for meeting 26.205(b)(3). That guidance addresses how to ensure that individuals work hour, break and minimum days off requirements are met prior to beginning or resuming covered duties. This determination must be made before entering the section above for Beginning a Rolling Averaging Period. This guidance currently addresses ensuring the proper number of minimum days off has occurred in the last 7 day period. For the purposes of applying this guidance to the maximum average work hour alternative, instead of ensuring that individuals have the appropriate minimum days off, the licensee should ensure that the individuals have worked less than or equal to 54 hrs in the preceding 7 day period.

Example 7: A worker has worked the following schedule as an uncovered worker. The following Monday he is going to begin covered work. Since he meets the work hour and break limits, including having a 34 hour break in the last 9 days, and has worked less than or equal to 54 hours in the last week, he meets the requirements to transition to covered work.

S	M	T	W	T	F	S
	12	12	12	12	12	
	10	10	10	10	10	

Truncated Averaging Periods (these apply only to Item 1 above under Beginning a Rolling Averaging Period):

In the case where a fixed schedule has been set up for a worker to establish the history needed to begin the rolling averaging period, unforeseeable events could cause that schedule to be truncated prematurely due to events largely outside of the licensee's control. When such an event occurs, the licensee shall be considered to be in compliance with the rule if the schedule for the averaging period would have met the maximum average work hour limit had it not been truncated. Examples of events that could lead to unforeseeable truncation of the period are:

- An unexpected unit outage,
- A declared emergency, as defined in the licensee's emergency plan, or
- A covered worker has to be moved to uncovered duties
- Duties with the licensee are terminated
- An unplanned security system outage (security only)
- An increased threat condition (security only)

Following a truncated averaging period a licensee may:

- Start a new averaging period, or
- Choose not to truncate the averaging period

Extended absence:

An extended absence (e.g., vacations, short-term disability) is not considered an interruption or truncation of an averaging period but is considered part of the averaging period.

Example 8: A plant electrician is in her third week of her initial averaging period when she injures her knee while running at home. She is ordered to be on light duty for a period of time forcing her supervisor to move her to an office position that is not covered work. At the point when she left her covered duties her calculated work average would have been 60 hrs per week but her future schedule for the remainder of the first averaging period would have resulted in her average at the end of the period being 48 hrs/wk. The licensee in this case would be considered to be in compliance with the rule.

Example 9: A security officer is in the 4th full week of their initial averaging period when he notifies his supervisor he is resigning. At the point when he left the position as a covered worker his work hour average for the first 3 weeks of the averaging period was 56 hrs/week but the average for the entire averaging period would have been 52 hrs/week had he completed the initial averaging period. The licensee in this case would be considered to be in compliance with the rule.

If the licensee truncates an initial averaging period of their own volition, then the worker needs to meet the 54 hr/wk limit for the weeks worked.

Force-on-force tactical exercises:

The rule permits licensees who implement the proposed alternative during non-outage periods to exclude from the proposed 26.205(d)(7) calculations the hours worked by security personnel during

the actual conduct of NRC-evaluated force-on-force tactical exercises. In practice, licensees should exclude from the calculation of hours worked during the actual conduct of NRC-evaluated force-on-force tactical exercises only those hours worked in excess of 54 hours during the week of the exercise.

NEI 06-11, Section 7.5, Reset from Deviations:

Section 7.5 provides guidance on how to restore a person to compliance with work hour requirements when a deviation from those requirements has occurred. This guidance currently ensures actions are in place to meet the minimum day off requirements for the current shift cycle. For the purposes of applying this guidance to the maximum average work hour alternative, instead of ensuring that the individual will meet minimum day off requirements, the licensee should ensure they will meet the maximum average work hour requirement for the current averaging period.

Example 10: A worker is a covered worker with a 5 week averaging period. They worked the schedule below for weeks T-1 through T-5. The 72 hour work week in week T-5 has caused a deviation of the maximum average work hour requirement. To reset from this deviation, they are limited to 30 hours in week T to return to compliance with the maximum average work hour requirement.

Week T-5	40	Work Hr Average
Week T-4	60	
Week T-3	60	
Week T-2	48	
Week T-1	72	56
Week T	30	54

Waivers for 26.205(d)(7) Work Hour Controls

Licensees may issue waivers in accordance with 26.207 for workers to exceed the maximum average of 54 hours/week. If a waiver is issued for this control limit, a new fatigue assessment must be conducted for each work period while the worker is in excess of the limit.

Example 11: A worker has the following schedule, and emergent work is necessary to mitigate or prevent a condition adverse to safety on the Friday and Saturday of the last week such that the weekly average will be 58 hours/week. Only one waiver would be required and would be reported as one waiver of the maximum average 54 in the annual FFD report required per 26.203(e). However, the worker must be evaluated for fatigue by a face-to-face supervisory assessment no more than 4 hours before work is conducted for both work periods.

Original Schedule – AVG54 compliant						
S	M	T	W	H	F	S
	12	12	12	12	12	
	10	10	10	10	10	
	10	10	10	10	12	
	12	12	12	12	12	

	10	10	12	12	10	
	12	12	12	12		

Modified Schedule – Waivers Required						
S	M	T	W	H	F	S
	12	12	12	12	12	
	10	10	10	10	10	
	10	10	10	10	12	
	12	12	12	12	12	
	10	10	12	12	10	
	12	12	12	12	12	12