

NRR-PMDAPEm Resource

From: Wiebe, Joel
Sent: Friday, May 06, 2011 11:25 AM
To: 'Gary.D.Miller@dom.com'; 'David.Sommers@dom.com'
Subject: Millstone Power Station Units 1, 2, and 3 - Preliminary RAIs for 10 CFR 26.205(c) and (d) Exemption Request

Here are the preliminary Millstone RAIs regarding your February 10, 2011, exemption request. The purpose of sending preliminary RAIs is to ensure the RAIs are clear and understandable. If clarification is needed, I will arrange for a teleconference to discuss them.

By letter dated February 10, 2011, Dominion Nuclear Connecticut, Inc., the licensee for Millstone Power Station Units 1, 2, and 3 requested an exemption from certain requirements of the Fitness for Duty Rule for Managing Fatigue. Specifically, the letter requested an exemption from the requirements of 10 CFR 26.205 (c) and (d) for meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane-force winds.

The staff determined that additional information is required to complete its review. In order for the staff to meet its schedule for completing the review, a response is requested by May 20, 2011.

- 1) The exemption request discusses a need to sequester individuals onsite to perform preparation, response and recovery actions associated with a severe weather event. The exemption request also discusses the fact that the local area where Millstone is sited was crossed by five hurricanes in the past eighty-four years. However, the supplied Millstone site procedures do not specify the need to sequester individuals. The supplied procedures also do not specify the specific job duty groups to be sequestered.
 - a) Provide specific procedural references that control the sequestering of individuals onsite during a severe weather event, or describe how the need to sequester individuals will be incorporated into current procedures.
 - b) With respect to the applicability of the exemption request, provide a breakdown of the various job duty groups and numbers of individuals in each group who will be sequestered.
- 2) AOP 3569 "Severe Weather Conditions" indicates that entry conditions into the AOP include a hurricane advisory. There is no mention of a tropical storm watch or warning. Describe how this procedure, or other procedure, will be revised to reflect the conditions requested in the exemption.
- 3) Lessons learned from NUREG-1474 include that as much as possible, site preparation for a hurricane should occur prior to the need to sequester individuals. What is the time period that is allocated for personnel to prepare the site for a storm, prior to the arrival of hurricane force winds on-site? Be as precise as possible with respect to the number of days or hours prior to the arrival of severe winds.
- 4) Many factors contribute to fatigue. One of these factors is inconsistent start times. In order to manage fatigue during the sequester, will shift start times be pre-planned and consistent? Explain the rationale for organizing current shift start times during the sequester.
- 5) Time at work is one of the major contributors to fatigue; another is lack of restorative rest. What are the expected typical shift durations for the various job duty groups that will be sequestered? Will any individuals be required to work shifts longer than 12 hours?
- 6) Licensees are expected to provide an opportunity for restorative rest to mitigate the fatigue that is possible under a sequester for hurricane force winds. Describe the methods to be used and the specific proceduralized actions that govern housing and bunking of the sequestered individuals.
- 7) NRC staff is not only concerned with fatigue management prior to and during the requested exemption, staff is equally concerned with site individuals' fatigue when returning to work hour controls such that the resumption of work hour controls is prudently implemented and individuals are not fatigued on the first day on work hour controls. Describe the general criteria that plant management will consider when making the determination to resume work hour controls.

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