

June 30, 2011

MEMORANDUM TO: Undine Shoop, Chief
Health Physics and Human Performance Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

FROM: Michael Boggi, Sr. Human Factors Engineer **/RA/**
Health Physics and Human Performance Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF PUBLIC MEETING TO DISCUSS
IMPLEMENTATION GUIDANCE FOR CUMULATIVE FATIGUE
REQUIREMENTS THAT WILL BE BASED ON A MAXIMUM 54
HOUR PER WEEK ROLLING AVERAGE

On May 11, 2011, the Nuclear Regulatory Commission (NRC) held a public stakeholder meeting regarding implementation guidance for the proposed alternative to the minimum days off (MDO) requirements in 10 CFR Part 26, Subpart I, "Managing Fatigue." The purpose of this meeting was to allow interested stakeholders an opportunity to discuss with the NRC implementation guidance concepts and specific details for implementing cumulative fatigue provisions that will be based on a maximum 54 hours per week rolling average. This was the second meeting on this topic.

The meeting was noticed on April 29, 2011. The notice is available electronically at the NRC's Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams/web-based.html> where the public can access the text and image files of NRC's public documents in the NRC's Agencywide Document Access and Management System (ADAMS). The meeting notice can be found under accession number ML11119A200.

The meeting participants included NRC staff and contractors, members of the power reactor licensee and vendor community, and representatives from the Nuclear Energy Institute (NEI) and the International Brotherhood of Electrical Workers (IBEW). These participants are listed in Enclosure 2. Enclosure 3 contains the meeting agenda.

CONTACT: Michael Boggi, NRR
301-415-5309

Enclosures: 1. Meeting Summary
2. Meeting Attendance List
3. Agenda

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Distribution: See next page

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OFFICE	DIRS/IHPB	BC/IHPB
NAME	MBoggi	UShoop
DATE	6/ 28/2011	6/30/2011

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Summary of May 11, 2011, Public Meeting Regarding 10 CFR Part 26 Subpart I Implementation Guidance

On May 11, 2011, the Nuclear Regulatory Commission (NRC) held a public stakeholder meeting regarding implementation guidance for the proposed alternative to the minimum days off (MDO) requirements in 10 CFR Part 26, Subpart I, "Managing Fatigue." The purpose of this meeting was to allow interested stakeholders an opportunity to discuss with the NRC implementation guidance concepts and specific details for implementing cumulative fatigue provisions that will be based on a maximum 54 hours per week rolling average. This was the second meeting on this topic.

The meeting was noticed on April 29, 2011. The notice is available electronically at the NRC's Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams/web-based.html> where the public can access the text and image files of NRC's public documents in the NRC's Agencywide Document Access and Management System (ADAMS). The meeting notice can be found under accession number ML11119A200.

The meeting participants included NRC staff and contractors, members of the power reactor licensee and vendor community, and representatives from the Nuclear Energy Institute (NEI) and the International Brotherhood of Electrical Workers (IBEW). These participants are listed in Enclosure 2. Enclosure 3 contains the meeting agenda.

1. Opening Remarks

The meeting began with opening remarks. The NRC staff stated that the purpose of the meeting was to discuss the guidance that will accompany the recently proposed rule regarding an alternative to the MDO requirements in Part 26.¹ The proposed alternative is a 54-hour weekly limit, averaged over a rolling 6-week (or shorter) period. This public meeting followed-up on the discussion during the April 27, 2011, public meeting on the same topic. As a basis for this meeting NEI had submitted a revised guidance document based on the outcomes of the April 27, 2011 meeting.

2. NRC Comments and Questions on the Revised Guidance Document

Following a brief presentation on the revised guidance document by NEI representatives, the NRC staff commented on the guidance and asked clarifying questions. These comments and questions focused on the following topics.

Terminology

The NRC staff suggested that certain terminology used throughout the guidance document needs clarification.

¹ "Alternative to Minimum Days Off Requirements," 76 Federal Register 80 (26 April 2011), pp. 23308-23218.

Definition of Rolling Period

The NRC staff identified an inconsistency between the proposed rule and the proposed guidance with regard to the allowable rolling (incrementing) period. The staff also suggested that the term “calendar days” needs to be defined more explicitly.

Partial Averaging Periods

The NRC staff asked questions regarding a perceived inconsistency between the proposed rule and the proposed guidance with regard to individuals who begin covered work in the middle of an averaging period.

3. Next Steps

At the conclusion of the meeting, the NRC staff stated that the overall approach in the guidance is generally acceptable. NEI agreed to revise the guidance to address the comments and questions received during the meeting. Once completed, NEI will submit the revised document to the NRC staff for review. The NRC staff suggested that another public meeting should be held on the revised draft guidance before the close of the proposed rule’s comment period on May 26, 2011.

May 11, 2011, Public Meeting Regarding 10 CFR Part 26 Subpart I Implementation Guidance

Attendance List

NAME	AFFILIATION
Howard Benowitz	NRC
Michael Boggi	NRC
Fred Brown	NRC
Patrick Coughlin	NRC
David Desaulniers	NRC
Carmen Franklin	NRC
Paul Harris	NRC
Tara Inverso	NRC
Kamishan Martin	NRC
Stephanie Morrow	NRC
Tim Reed	NRC
Undine Shoop	NRC
Donna Alexander	Progress Energy
David Balas	Westinghouse
Scott Bauer	NEI
Paul Bemis	PG&E
Jana Bergman	Scientech
John Butler	NEI
Victoria Brown	NextEra Energy
Jason Castro	TVA
Nancy Chapman	Bechtel
Peter Crinigan	CENG
Peter J. Defilippi	Westinghouse
Susan Downs	Susquehanna
Liz Gormsen	ICF
Greg Halnon	FirstEnergy
Jack Heyer	IBEW
Richard Herrle	Ventyx
Lee Marabella	PSEG
Frank Mascitelli	Exelon
Miguel Matamoros	ICF
Dave Mullen	IBEW
Lisa Nance	STP
Vicki Pancurak	Westinghouse
Josh Perrel	TVA
Thomas Perry	SCE&G
Mike Phillips	Duke Energy
Don Rickard	STARS
Margi Rochester	Susquehanna
Brian Snyder	PROS
Georgia Thu	ICF

NAME	AFFILIATION
Jim Wheeler	Dominion

Agenda

**MEETING AGENDA FOR THE CATEGORY 3 PUBLIC MEETING
TO DISCUSS IMPLEMENTATION GUIDANCE FOR THE 10 CFR PART 26
CUMULATIVE FATIGUE REQUIREMENTS
MAY 11, 2011; 1:00 p.m. – 5:00 p.m.
NRC, EXECUTIVE BOULEVARD BUILDING
6003 EXECUTIVE BOULEVARD
ROOM: 01-15
ROCKVILLE MD 20852**

The NRC staff is conducting this public meeting to allow discussion towards the development of implementation guidance for the cumulative fatigue requirements of 10 CFR Part 26, Subpart I, "Managing Fatigue."

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| 1:00 – 1:15 p.m. | Opening comments and introductions |
| 1:15 – 3:00 p.m. | Implementation guidance discussion |
| 3:00 – 3:15 p.m. | Break |
| 3:15 – 4:45 p.m. | Continuation of the implementation guidance discussion |
| 4:45 – 5:00 p.m. | Summation, next meeting schedule and adjournment |