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10CFR 26.203(e) 10CFR 26.717

United States Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

SALEM GENERATING STATION – UNIT 1 and UNIT 2 FACILITY OPERATING LICENSE NOS. DPR 70 and DPR-75 NRC DOCKET NOS. 50-272 and 50-311

HOPE CREEK GENERATING STATION FACILITY OPERATING LICENSE NO. NPF-57 NRC DOCKET NO. 50-354

Subject:

SUPPLEMENTAL 2009 AND 2010 ANNUAL REPORT OF FITNESS

FOR DUTY (FFD) PERFORMANCE DATA

Reference:

Letter LR-N11-0058, Paul J. Davison to US NRC Document Control

Desk, "ANNUAL REPORT OF FITNESS FOR DUTY (FFD)

PERFORMANCE DATA" dated February 18, 2011.

On February 16, 2010 PSEG submitted the Annual Report Of Fitness For Duty Performance Data for the 12 month period January 1, 2009 through December 31, 2009 electronically via the NRC FFD Program Performance Data Reporting System Electronic Information Exchange Portal. Fatigue Management data from its implementation on September 28, 2009 through December 31, 2009 was included in the 2009 report.

On February 18, 2011 PSEG submitted the Annual Report Of Fitness For Duty Performance Data for the 12 month period January 1, 2010 through December 31, 2010 (Reference). Subsequently, additional information related to violations of the Work Hour Rule during the time period between September 28, 2009 and December 31, 2010 has resulted in a change to the information provided in the Conclusions section of the 10CFR Part 26, Subpart I – Managing Fatigue Reports for both 2009 and 2010.

Additionally, Mr. Paul Harris of the NRC staff has requested that PSEG amend five single positive test forms submitted in the 2010 report.

# Document Control Desk LR-N11-0206

# PSEG Nuclear LLC hereby submits the following:

- Supplemental wording describing newly discovered violations not reported in the 2009 Annual Fatigue Reporting Form (Attachment 1).
- A revised Annual Fatigue Reporting Form for the 12 month period January 1, 2010 through December 31, 2010 with amended violations data and supplemental wording describing newly discovered violations not reported in the 2010 Annual Fatigue Reporting Form (Attachment 2).
- Five single positive test forms previously submitted in the 2010 report amended per NRC request (Attachment 3).

There are no regulatory commitments contained in this correspondence.

Should you have any questions concerning this letter or attachments, please contact Lee Marabella at (856) 339-1208.

Sincerely,

Anndria Gaerity

Director, Emergency Services

### Attachments:

- 1. Supplemental wording describing newly discovered violations not reported in the 2009 Annual Fatigue Reporting Form
- 2. Amended 2010 Annual Fatigue Reporting Form
- 3. Five single positive test forms previously submitted in the 2010 report amended per NRC request
- C: Corporate Commitment Tracking Coordinator

Commitment Coordinator - Salem

Commitment Coordinator - Hope Creek

### Attachment 1

The following paragraph is hereby added to the Summary and Status of Corrective Actions section of the 2009 Annual Fatigue Reporting Form:

In addition to the violations described above, six additional violations were uncovered in 2011 as a result of performing actions to correct an EmpCenter software error. These violations occurred during the time period 10/12/2009 through 10/17/2009 and were related to a single worker not meeting their 34 hour break in a 9 day period requirement and because of the way the time was entered, the violation was not flagged at the time. The violation continued for 5 additional days until the worker had a 34 hour break. The version of the software in effect at that time was not capable of recognizing the violations due to the incorrect method of time entry; however subsequent versions of the software have corrected that error.

### Attachment 2

# Amended 2010 Annual Fatigue Reporting Form

# Changes include:

- A note at the bottom of the Conclusions section of the "Summary Of Corrective Action" box which states, "Note; Correction of computer software error revealed 6 additional violations in security during 2010. Average of less than 3 days off per week for 12 hour security shifts 6
- Replacement of the second sentence in the Summary and Status Of Corrective Actions with the following statement:

"Corrective actions as a result of Work Group Evaluations and Apparent Cause Evaluations have been implemented. The need for Fatigue Management refresher training including software use is currently being evaluated."

# Attachment 3

Five single positive test forms previously submitted in the 2010 report amended per NRC request