

July 21, 2011

Mr. John C. Butler, Senior Director  
Engineering and Operations Support  
Nuclear Generation Division  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

SUBJECT: ENDORSEMENT OF INDUSTRY GUIDANCE REGARDING IMPLEMENTATION  
OF AN ALTERNATE CUMULATIVE FATIGUE MANAGEMENT APPROACH  
UNDER 10 CFR 26.205(d)(7)

Dear Mr. Butler:

The regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 26, "Fitness for Duty Programs," establish requirements for ensuring that personnel at nuclear power plants are fit to safely and competently perform their duties. On March 24, 2011, the Nuclear Regulatory Commission (Commission or NRC) issued a Staff Requirements Memorandum (SRM) that directed the NRC staff to conduct a rulemaking to provide an alternative to the Part 26 cumulative fatigue management provisions called "minimum days off" requirements. In its SRM, the Commission also directed the staff to provide associated implementation guidance concurrent with the publication of the new rule.

Subsequently, the Nuclear Energy Institute (NEI) submitted to the NRC an addendum (the Addendum) (Agencywide Documents Access and Management System (ADAMS) Accession Number ML11189A177) to their guidance document, NEI 06-11, Revision 1, "Managing Personnel Fatigue at Nuclear Power Reactor Sites" (ADAMS Accession No. ML11199A094). The Addendum provides information and describes methods specifically applicable to implementing the alternative method of managing cumulative fatigue.

On July 21, 2011, the NRC issued the final rule amending 10 CFR Part 26 to include the alternative to the minimum days off requirements (76 FR 43534). The NRC staff considers conformance with the guidance in the Addendum to be an acceptable approach to meeting these alternative requirements.

J. Butler

Licensees and other entities subject to Subpart I of 10 CFR Part 26 may use methods other than those described in the Addendum to meet the amended requirements. The NRC will determine the acceptability of other methods on a case-by-case basis.

Sincerely,

Troy W. Pruett, Acting Director **/RA/**  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

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Licensees and other entities subject to Subpart I of 10 CFR Part 26 may use methods other than those described in the Addendum to meet the amended requirements. The NRC will determine the acceptability of other methods on a case-by-case basis.

Sincerely,

Troy W. Pruett, Acting Director **/RA/**  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

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