



NUCLEAR ENERGY INSTITUTE

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June 24, 2011

Mr. Troy W. Pruett  
Director  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Implementation Guidance for Maximum Average Work Hours Alternative to Support the Proposed Rule for an Alternative to Minimum Day Off (MDO) Requirements (76FR23208)

**Project Number: 689**

Dear Mr. Pruett:

Through a series of public meetings, the attached addendum to NEI 06-11, "Revision 1, Managing Personnel Fatigue at Nuclear Power Reactor Sites," was developed. It contains guidance for implementation of the maximum average work hours alternative of the subject proposed rule. At a public meeting on June 23, 2011, agreement was reached that this guidance provides an acceptable method for implementing the maximum average work hour provisions of the proposed rule. Accordingly, the Nuclear Energy Institute requests, on behalf of the industry, NRC endorsement of this guidance. Upon NRC endorsement of the guidance, the addendum will be added to NEI 06-11, Revision 1.

If you have any questions regarding these matters, please contact Scott Bauer at 202-739-8058; [sab@nei.org](mailto:sab@nei.org) or me at 202-739-8108; [jcb@nei.org](mailto:jcb@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Butler", written in a cursive style.

John C. Butler

Attachment

c: Ms. Undine Shoop, NRR/DIRS, NRC