



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 24, 2017

MEMORANDUM TO: Joseph G. Giitter, Director
Division of Risk Assessment
Office of Nuclear Reactor Regulation

FROM: Michael C. Cheok, Director */RA/ M. Thaggard for*
Division of Risk Analysis
Office of Nuclear Regulatory Research

SUBJECT: TRANSMITTAL OF TECHNICAL LETTER REPORT, "FATIGUE
WAIVER DATA ANALYSIS"

The Human Factors Reliability Branch in the Division of Risk Analysis is forwarding the technical letter report, "Fatigue Waiver Data Analysis," in response to Task 3 of the Office of Nuclear Reactor Regulation (NRR) Research Assistance Request 2016-0020, "Fatigue Rule Support." The staff initiated this work to analyze the information received in annual reports that licensees have submitted to the U.S. Nuclear Regulatory Commission (NRC) under the fatigue provisions of 10 CFR Part 26, "Fitness for Duty Program." The purpose of this task is to obtain insights on licensee fatigue management performance under the rule as well as insights into any programmatic issues that may exist.

This report compares the number of waivers of work hour controls issued by licensees in calendar year (CY) 2010 to the number issued in 2015 and summarizes other information submitted in the CY 2015 licensee annual performance reports. In addition to the technical letter report, we are transmitting an excel file containing the original data used to perform the analysis, which may be expanded to include additional years' data, should NRR so choose.

In brief, this analysis shows that licensees' management of work hours has improved substantially since the Part 26 fatigue management requirements were promulgated in 2008. In CY 2000, some licensees were granting up to 7500 deviations annually from the work hour guidelines contained in Generic Letter 82-12, "Nuclear Power Plant Staff Working Hours," with about one-third of licensees granting 1000 or more annually. In CY 2010, the first year that licensees were required to meet the more stringent work hour controls in the 2008 final rule, the total number of waivers issued across the fleet decreased to 3800, excluding one site whose data was unavailable. In CY 2015, the total number of waivers reported was 338. No systematic or programmatic weaknesses in implementation of the fatigue management requirements in Part 26 were apparent from this analysis.

CONTACT: Valerie Barnes, RES/DRA/HFRB
301-415-7000

J. Giitter

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Our intent is to make the technical letter report and excel file publicly available in ADAMS within 2 weeks. Please feel free to notify Sean Peters (301-251-7582, Sean.Peters@nrc.gov) of my staff if you have any questions concerning the impending publication of these products.

Enclosures

Technical Letter Report

Excel file

TRANSMITTAL OF TECHNICAL LETTER REPORT, "FATIGUE WAIVER DATA ANALYSIS"

DISTRIBUTION:

S. Weerakkody, NRR

M. Montecalvo, NRR

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W. Gott, NSIR

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OFFICE	RES/DRA/HFRB	BC: RES/DRA/HFRB	D: RES/DRA
NAME	V. Barnes	S. Peters (A. D'Agostino for)	M. Cheok (M. Thaggard for)
DATE	2/1/17	2/08/17	02/24/17

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