

Peter Dietrich
Senior Vice President and Chief Nuclear Officer

DTE Energy Company
6400 N. Dixie Highway, Newport, MI 48166
Tel: 734.586.4153 Fax: 734.586.1431
Email: peter.dietrich@dteenergy.com



July 11, 2020
NRC-20-0049

10 CFR 26.205(d)

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Fermi 2 Power Plant
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Fermi 2 Work Hour Limits Exemption Request due to COVID-19 Revised
Second Supplement

- References:
1. NRC Letter from H. Nieh to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for Work Hour Controls During the Coronavirus Disease 2019 Public Health Emergency," March 28, 2020 (ML20087P237).
 2. DTE Electric letter to NRC, "Fermi 2 Work Hour Limits Exemption Request Due to COVID-19," NRC-19-0024, dated May 11, 2020 (ML20132A239)
 3. NRC Letter to DTE, "Fermi-2 – Exemption from Select Requirements Of 10 CFR PART 26 (EPID L-2020-LLE-0056 [COVID-19])," dated May 14, 2020 (ML20133K055)
 4. DTE Electric letter to NRC, "Fermi 2 Work Hour Limits Exemption Request due to COVID-19 Supplement," NRC-20-0045, Dated July 6, 2020 (ML20188A339)
 5. DTE Electric letter to NRC, "Fermi 2 Work Hour Limits Exemption Request due to COVID-19 Second Supplement," NRC-20-0048, Dated July 10, 2020 (ML20192A107)

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), in Reference 2 DTE Electric Company (DTE) requested NRC approval for Fermi Unit 2 (Fermi 2) to proactively enter into the alternative work hour controls described in Reference 1. In reference

3, the NRC approved this exemption with an effective period through 12:00 a.m. on July 14, 2020. Subsequently, DTE requested an extension of the alternative work hour controls in Reference 4 due to a COVID-19 outbreak affecting the Torus recoating effort and extending the refueling outage to over 100 days.

By email from Mr. Surinder Arora dated July 9, 2020, the NRC requested that DTE provide additional information regarding the effects of cumulative fatigue that may be encountered during the extension requested in Reference 4. In Reference 5, DTE submitted the additional information to the NRC. This letter replaces Reference 5 in its entirety and adds scheduling information for the Maintenance category.

The information in the following table describes how cumulative fatigue has been managed for the various positions included in the initial work hour limit exemption period approved in Reference 3 and how it will be managed during the exemption extension period requested in Reference 4.

10 CFR	Positions	Additional Information
26.4(a)(1)	Operators	<p>During the initial exemption period, 99 workers were considered to meet this category. These personnel worked a 4 day on and 1 day off schedule of 12-hour shifts with up to 1 hour of additional time for thorough turnover and with the maximum average work hours of 71.5 hours/week. During this initial exemption period, additional off days, including vacation, have been taken by the majority of Operators. Five Operators swapped from day shift to night shift or night shift to day shift during the initial exemption period.</p> <p>For the requested extension period, Operations will adjust to a 5 day on and 2 day off schedule of 12-hour shifts with up to 1 hour of additional time for thorough turnover. Also, Operators will not swap shifts between day and night until the outage is complete and online rules established.</p> <p>Operators have maintained consistent schedules through the initial exemption period and will add consecutive days off in the extension period.</p>
26.4(a)(2)	Health Physics	<p>During the initial exemption period, 12 Radiation Protection personnel were considered to meet this category. Of the 12 workers in this category, 10 had two consecutive days off within the past two weeks. Personnel in this category have worked and will continue to work a two-week schedule of one week of six 12-hour shifts followed by one day off and then a week of five 12-hour shifts followed by two days off. This schedule averaged 66 hours per week over the initial exemption period. This average</p>

10 CFR	Positions	Additional Information
		<p>does not include time off from work due to sick or quarantine periods.</p> <p>Radiation Protection personnel will maintain current schedules, which include at least two consecutive days off, through the extension period.</p>
26.4(a)(2)	Chemistry	<p>During the initial exemption period, 7 Chemistry personnel were considered to meet this category. Personnel in this category worked a 4 day on and 1 day off schedule of 12 and one-half hour shifts, including turnover, with the maximum average work hours of 66 hours/week. Of the 7 workers in this category, 3 had two consecutive days off within the past two weeks.</p> <p>For the requested extension period, Chemistry will adjust to a 5 day on and 2 day off schedule of 12 and one-half hour shifts, including turnover. Chemistry will implement rest hours during the extension period to transition to online requirements.</p>
26.4(a)(3)	Fire Brigade	<p>Operations personnel fulfill Fire Brigade positions. Therefore, fire brigade personnel are subsumed into Operators category.</p>
26.4(a)(4)	Maintenance	<p>Personnel defined by the Maintenance category cover a broad spectrum of specialized work positions including mechanics, electricians, Instrument & Controls technicians, local leakage rate testers, welders, applicators of specialized coatings, and their supervision.</p> <p>There are 142 DTE mechanical, electrical, and Instrument & Controls personnel in this category during the initial exemption period. During the initial exemption period, personnel in this group typically worked a two-week schedule of one week of six 12-hour shifts followed by one day off and then a week of five 12-hour shifts followed by two days off. For the extension period, all personnel in this group will follow the two-week schedule of one week of six 12-hour shifts followed by one day off and then a week of five 12-hour shifts followed by two days off. The workers in this group had a maximum average of 66 hours/week during the initial exemption period. In addition, within the past 2 weeks all DTE Maintenance personnel have taken a minimum of 2 consecutive days off.</p> <p>There are 99 supplemental Maintenance personnel performing maintenance functions also in this category during the initial</p>

10 CFR	Positions	Additional Information
		<p>exemption period and they worked a maximum average of 66 hours/week. During the extension period, these personnel will apply a 5 day on and 2 day off schedule of 12-hour shifts. In addition, these resources are being augmented with new individuals. Of the 99 workers in this category, 71 had two consecutive days off within the past two weeks.</p> <p>There are an additional 41 supplemental Maintenance personnel that support the refuel floor activities which recently reported to Fermi 2 for work and have had a minimum of 6 consecutive days off within the past 2 weeks.</p> <p>There are 6 DTE Performance Engineering personnel that supported local leakage rate testing activities in this category during the initial exemption period. All 6 workers in this category have had a minimum of two consecutive days off within the past two weeks and 4 of the personnel have had 21 days off over the last 60 days.</p>
26.4(a)(5)	Security	Nuclear Security utilized alternate controls during the initial exemption period but will not utilize them in the extension period.

As described above, many personnel have had additional time off in the last two weeks and many schedules are being adjusted for the extension period to provide consecutive days off. Additionally, Fermi will perform a cumulative fatigue awareness stand down prior to implementation of this request and will focus on fatigue in our safety and human performance messages as we have throughout the refueling outage. These measures and conditions prevent cumulative fatigue to ensure that the ability of individuals to safely and competently perform their duties is not compromised.

There have been no self-declarations during the initial exemption period. In addition, during the entire duration of the refueling outage thus far there were 2 fatigue assessments. These assessments took place prior to the initial exemption period. One was a For-Cause and the other was a Post-Event fatigue assessment. Neither were determined to be fatigue-related.

Fermi will continue to implement the alternative controls described in Reference 4 upon NRC approval.

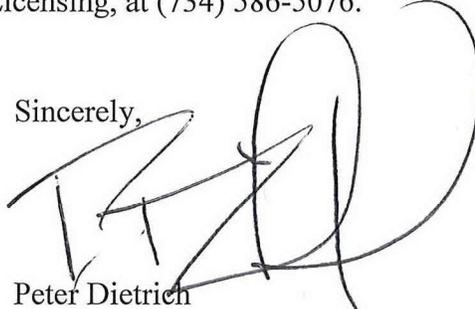
DTE now requests approval of the exemption request in Reference 4 by no later than July 13, 2020.

No new commitments are being made in this submittal.

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Should you have any questions or require additional information, please contact Ms. Margaret Offerle, Manager – Nuclear Licensing, at (734) 586-5076.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Dietrich', with a large, stylized flourish extending to the right.

Peter Dietrich
Senior Vice President and Chief Nuclear Officer

cc: NRC Project Manager
NRC Resident Office
NRC Region III Branch Chief Division of Reactor Projects Branch 4
Regional Administrator, Region III