

August 6, 2020

To: Ms. Booma Venkataraman, Project Manager, NRC Region 3
cc: NRC Senior Resident Inspector
Document Control Desk

RE: Point Beach Nuclear Plant
Docket Nos. 50-266
50-301

Reference: 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

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), NextEra Energy Point Beach, LLC (NextEra) is requesting NRC approval to proactively enter into the alternative work hour controls delineated in the referenced letter for the Point Beach Nuclear Plant (Point Beach) covered workers described below. The basis for the request is that NextEra is anticipating conditions where the station would no longer meet the work-hour controls of 10 CFR 26.205(d) for certain positions at Point Beach. By implementing alternative work hour controls, NextEra is proactively taking steps to complete necessary work, testing, and inspections in a manner that supports both worker and neighboring community safety to limit the spread of the COVID-19 virus. This request is being made to support NextEra's efforts to maintain Centers for Disease Control and Prevention recommendations related to social distancing, worker screening, and limiting close-proximity work. Particularly, given the COVID-19 challenge in the immediate community of Point Beach, leveraging the alternative work hour controls will facilitate further worker and community protection as Point Beach continues daily operation of Units 1 and 2 and upcoming Fall Unit 1 refueling outage.

As the U.S. Departments of Homeland Security and Energy have stated in their guidance, the electric grid and nuclear plant operation make up the nation's critical infrastructure, similar to medical, food, communications, and other critical industries. Point Beach station operations and refueling outages must be conducted such that the plant is available when needed, including during the critical peak summer loads.

In accordance with the referenced letter, the table below lists the individual categories as described in 10 CFR 26.4(a)(1) - (5), for which the proposed alternative work-hour controls will be implemented as a preventive measure to reduce the spread of the COVID-19 virus, and the date and time the alternative controls will become effective.

Applicability	Position / Duties	Compliance	Begin Implementation
26.4(a)(1)	Operators	Will apply alternative work hour controls defined in referenced letter as necessary to minimize covered work transition issues.	Upon NRC approval

26.4(a)(2)	Health Physics and Chemistry	Will apply alternative work hour controls defined in referenced letter as necessary to minimize covered work transition issues.	Upon NRC approval
26.4(a)(3)	Fire Brigade	Will apply alternative work hour controls defined in referenced letter as necessary to minimize covered work transition issues.	Upon NRC approval
26.4(a)(4)	Maintenance	Will apply alternative work hour controls defined in referenced letter as necessary to minimize covered work transition issues.	Upon NRC approval
26.4(a)(5)	Security	Will apply alternative work hour controls defined in referenced letter as necessary to minimize covered work transition issues.	Upon NRC approval

Consistent with the COVID-19 PHE fatigue-management controls specified in the referenced letter, NextEra proposes the following alternative controls for the management of fatigue at Point Beach during the period of exemption. At a minimum, these alternative controls assure adequate rest for covered workers between periods of 10 CFR 26.4(a)(1)-(5) related performance:

- 1) Not more than 16 work hours in any 24-hour period and not more than 86 work hours in any 7-day period, excluding shift turnover;
- 2) A minimum 10-hour break between successive work periods;
- 3) 12-hour shifts are limited to not more than 14 consecutive days;
- 4) A minimum of 6 days off in any 30-day period;
- 5) The behavioral observation and self-declaration allowance requirements specified in NextEra Nuclear Fleet administrative procedures AD-AA-101-1004, Work Hour Controls, and SY-AA-100-1012, Behavior Observation, will remain in effect.

NextEra's Nuclear Fleet administrative procedures AD-AA-101-1004 and SY-AA-100-1012, implement the requirements of 10 CFR 26.33, "Behavioral observation"; 10 CFR 26.209, "Self-declarations"; and 26.211, "Fatigue assessments". The regulations establish that procedures and processes shall be in place to address personnel impairment due to fatigue through observation by plant staff and by worker self-declaration, and to address instances of impairment by means of fatigue assessments. NextEra will continue to follow these requirements during the period of exemption to assure site-specific COVID-19 PHE fatigue-management controls at Point Beach are consistent with the constraints outlined in the referenced letter.

In order to expedite implementation of the safety benefits of the alternate work hour controls, NextEra requests approval of this request for Point Beach by August 20, 2020. We understand the authorization will be followed by a written confirmation and shall expire upon sixty (60) days of NRC approval.

Should you have any questions, please contact Kim Locke Principal Engineering Analyst-Licensing, at 920-242-6549.

Respectfully,

A handwritten signature in black ink, appearing to read 'Eric Schultz', with a long horizontal stroke extending to the right.

Eric Schultz
Licensing Manager
NextEra Energy Point Beach, LLC