

# **COVID-19 Related Request for Exemption from Part 26 Work Hours Requirements**

Submitted: Sep 14, 2020

**1. Submitter Name/Title:**

Patrick Simpson, Senior Manager Licensing

**2. Email Address**

Please enter the email address for which you would like to receive communications regarding this request.

**Patrick.Simpson@exeloncorp.com**

**3. Organization**

Exelon Generation Co., LLC

**4. Plant Name**

Dresden

**5. Plant Unit(s):** 2,3

**6. Need By Date**

2020-10-12

**7. Docket Number(s)**

Example: 05000313

05000237 and 05000249

**8. License Number(s)**

Example: DPR-51

DPR-19 and DPR-25

**9. NRC Licensing Project Manager**

R. HASKELL

**10. Statement that the licensee above can no longer meet the work hour controls of 10 CFR 26.205(d) for certain personnel or groups of personnel specified in 10 CFR 26.4(a) because of site specific issues as a result of the COVID-19 public health emergency (PHE).**

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) Exelon Generation Company, LLC (EGC) is requesting NRC approval to proactively enter into the alternative work hour controls delineated in the referenced letter (ML20087P237) for the Dresden Nuclear Power Station, Units 2 and 3 (Dresden) for the covered workers noted below. The basis for the request is that EGC is anticipating conditions where the station would no longer meet the work-hour controls of 10 CFR26.205(d) for certain positions at Dresden.

By implementing the alternate work hour controls, Dresden is proactively taking steps to complete necessary work, testing, and inspections in a manner that supports worker and neighboring community safety to limit the spread of the COVID-19 virus. This request is being made to support Dresden's efforts to maintain Centers for Disease Control and Prevention (CDC) recommendations related to social distancing, worker screening, and limiting close-proximity work. Particularly given the COVID-19 challenge in the immediate community of Dresden, leveraging the alternative work hour controls will facilitate further worker and community protection during the upcoming outage and subsequent operation safely and efficiently.

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 the medical, food, communications, and other critical industries. Dresden's operation and outage must be conducted such that the plant is available when needed, including during the critical peak winter loads.

In accordance with the 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) the following information is provided below:

The following work groups will begin phasing in on October 19, 2020 the site-specific alternative controls as defined in the referenced NRC March 28, 2020 letter, as necessary, to minimize transition issues:

- 10CFR26.4(a)(1) Operators
- 10CFR26.4(a)(2) Health Physics and Chemistry

10CFR26.4(a)(3) Fire Brigade  
10CFR26.4(a)(4) Maintenance  
10CFR26.4(a)(5) Security

**11. List of personnel or groups of personnel specified in 10 CFR 26.4(a) for which the licensee will maintain current work hour controls under 10 CFR 26.205(d)(1)-(d)(7).**

N/A

**12. List and description of alternative controls for the management of fatigue to address site specific issues as a result of the COVID-19 PHE.**

Dresden's site-specific COVID-19 PHE fatigue-management controls are consistent with the constraints outlined in the referenced NRC letter and its attachment. Dresden will continue to follow the fatigue management controls, behavioral observation requirements, and self-declaration allowances currently delineated within the Exelon work hour control program and procedures (LS-AA-119, SY-AA-102, SY-AA-103-500).

The requirements of 10 CFR 26.33, "Behavioral observation"; 10 CFR 26.209, "Self-declarations"; and 26.211, "Fatigue assessments" remain in effect during the period of the exemption. These requirements provide reasonable assurance that should personnel become impaired due to fatigue, requirements and processes are in place to identify the impairment through observation by plant staff or by worker self-declaration, and to assess and address instances of impairment through fatigue assessments.

**13. Date when the licensee will begin implementing its site-specific COVID-19 PHE fatigue-management controls for personnel specified in 10 CFR 26.4(a)**

2020-10-19

**14. The time when the licensee will begin implementing its alternative controls for the management of fatigue for personnel (or group of personnel) specified in 10 CFR 26.4(a).**

00:00

**15. Statement that the licensee's site specific alternative controls for the management of fatigue are consistent with the minimum alternative controls listed below.**

Yes

**16. Does Licensee continue to meet the requirements of 10 CFR 26.33, "Behavioral observation"; 10 CFR 26.209, "Self declarations"; and 26.211, "Fatigue assessments."**

Yes

**17. The alternative controls include the following, as a minimum:**

- 1. Individuals will not work 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 is provided between successive work periods;**
- 3. 12-hour shifts are limited to not more than 14 consecutive days;**
- 4. A minimum of 6-days off are provided in any 30-day period; and**
- 5. Changes in actions to meet requirements for behavioral observation for both acute and cumulative fatigue and self declaration during the period of the exemption as appropriate due to potential for increased worker fatigue.**

Yes

**18. Additional Information:**

Use the area below to provide any additional information related to your exemption request.

Upon NRC approval, Dresden will implement the alternative controls described in the reference NRC letter for the management of fatigue on October 19, 2020 for an initial period of 60 days. Near the end of the 60-day period, if COVID-19 pandemic conditions persist at the site affecting staffing requirements and the efforts to maintain CDC, state and local recommendations related to social distancing, worker screening, and limiting close-proximity work, as well as of particular concern is the COVID-19 challenge in the immediate community of Dresden, an additional email supplement request may be submitted to extend the 60-day implementation period exemption.