

October 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 and 50-301
Renewed License Nos. DPR-24 and DPR-27

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
2. NextEra Energy Point Beach LLC Letter to NRC, *Work Hour Controls Exemption Request for Point Beach Nuclear Plant Units 1 and 2*, August 6, 2020 (ML20219A448)
3. NRC Letter to Point Beach Nuclear Plant Units 1 and 2, *Exemption from Select Requirements of 10 CFR Part 26 (EPID L-2020-LLE-0129 [COVID-19])*, August 17, 2020 (ML20219A751)

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE), NextEra Energy Point Beach, LLC (NextEra) requested NRC approval to proactively enter into the alternative work hour controls (Reference 2) as delineated in the Reference 1 for the Point Beach Nuclear Plant (Point Beach) covered workers. The NRC approved the exemption request on August 17, 2020 (Reference 3). The basis for the request was that NextEra anticipated conditions where the station would no longer meet the work-hour controls of 10 CFR 26.205(d) for certain positions at Point Beach.

NextEra is requesting a 60-day extension beyond the 60-days as defined in Reference 3. NextEra will be taking steps to monitor the cumulative effects of fatigue that may be encountered in any extension request. 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 Unit 1 and 2 and the 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.

Applicability	Position / Duties	Additional Information
26.4(a)(1)	Operators	<p>During the initial exemption period, Operations personnel worked online schedules of 12-hour shifts of 4 days on and 2 consecutive days off with up to 1 hour of turnover until the start of the Unit 1 outage. Operators that transitioned to the outage unit are working 12-hour shifts of 4 days on and 1 day off with up to 1 hour of turnover. The Operators working the online unit continue to work 12-hour shift of 4 days on and 2 consecutive days off with up to 1 hour of turnover. During this initial exemption period, additional days off, including vacation, have been taken by the majority of Operators. There were 11 Operators that exceeded the 54-hour average, as allowed by the exemption, but have since taken additional days off. These were the only uses of the exemption to this point. During the outage Operators have not swapped shifts between day and night.</p> <p>For the requested exemption extension period Operators working on the outage unit are scheduled to work 12-hour shifts of 4 days on and 1 day off with up to 1 hour of turnover. Operators working non-outage are scheduled to work 12-hour shifts of 4 days on and 2 consecutive days off with up to 1 hour of turnover. Operators will not swap shifts between day and night until the outage is complete and online rules established.</p>
26.4(a)(2)	Health Physics and Chemistry	<p>During the initial exemption period, Radiation Protection and Chemistry personnel worked their normal online schedules until the recent start of the Unit 1 outage where they transitioned to outage hours, and have not used the provisions of the exemption hours to this point.</p> <p>For the requested exemption extension period Health Physics and Chemistry personnel are scheduled to work their normal outage and online hours.</p>

26.4(a)(3)	Fire Brigade	Operations personnel fulfill Fire Brigade positions. Therefore, fire brigade personnel are subsumed into Operators category.
26.4(a)(4)	Maintenance	<p>During the initial exemption period, all Maintenance personnel worked their normal online schedule until the recent start of the Unit 1 outage where they transitioned to outage hours, and have not used the provisions of the exemption hours to this point.</p> <p>For the requested exemption extension period Maintenance personnel are scheduled to work their normal outage and online hours.</p>
26.4(a)(5)	Security	<p>During the initial exemption period, all Security personnel worked their normal online schedule until the recent start of the Unit 1 outage where they transitioned to outage hours, and have not used the provisions of the exemption hours to this point.</p> <p>For the requested exemption extension period Security personnel are scheduled to work their normal outage and online hours.</p>

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 October 15, 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,



Eric Schultz
Licensing Manager
NextEra Energy Point Beach, LLC