



NRC 2020-0036

October 8, 2020

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

RE: Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Response to Request for Additional Information Extension of Exemption from Certain
10 CFR Part 26 Requirements

References:

1. NextEra Energy Point Beach, LLC, letter NRC 2020-033, Extension of Exemption Request for Certain 10 CFR Part 26 Requirements due to COVID-19 Pandemic, October 6, 2020 (ADAMS Accession No. ML20280A621)
2. NRC Request for Additional Information Regarding Extension of Exemption from Certain 10 CFR part 26 Requirements Due to COVID-19, October 7, 2020
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)

In Reference 1, NextEra Energy Point Beach, LLC (NextEra) requested a 60-day extension beyond the 60-days as defined in Reference 3. The NRC has requested additional information (Reference 2) in order to complete their reviews.

The enclosure to this letter provides the response to the request for additional information and supplements Reference 1.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Schultz", written over a horizontal line.

Eric Schultz
Licensing Manager
NextEra Energy Point Beach, LLC

Enclosure

NextEra Energy Point Beach, LLC

6610 Nuclear Rad, Two Rivers, WI 54241

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

EXTENSION OF EXEMPTION FROM CERTAIN 10 CFR PART 26 REQUIREMENTS

NEXTERA ENERGY POINT BEACH, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

By application dated October 6, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20280A621), NextEra Energy Point Beach, LLC (the licensee), requested an extension to the exemption granted by the NRC, by letter dated August 17, 2020 (ADAMS Accession No. ML20219A751) from specific requirements of Title 10 of the Code of Federal Regulations (10 CFR) Part 26, "Fitness for Duty Programs," Section 26.205, "Work hours," for Point Beach Nuclear Plant, Units 1 and 2.

The NRC staff has reviewed the submittal and determined that additional information is needed to complete its review.

RAI

1. *On page 2 of the October 6, 2020, application, the licensee notes under the 'Compliance' column, "Will apply alternative work hour controls defined in referenced letter as necessary to minimize work transition issues."*

Please clarify what 'minimizing the work transition issues' means.

NextEra response: NextEra was referring to the potential challenges presented by COVID-19 and providing additional time off when (1) transitioning from a normal 8-hour workday schedule to 12-hour workday and (2) transitioning to an outage work schedule followed by returning back to normal (online) work hours.

2. *On page 3 of the October 6, 2020, application, in the table provided, under 'Additional Information' for Operators, the licensee states that there were 11 Operators that exceeded the 54-hour average, as allowed by the exemption, but have since taken additional days off.*

Please clarify if the Operators that exceeded the 54-hour average, were identified through behavioral observations or self-declaration as being of impaired fitness for duty due to fatigue.

NextEra response: There were no behavioral observations or self-declarations that identified impaired fitness for duty due to fatigue for the operators that exceeded the 54-hour average.