

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

Submitted: Nov 17, 2020

**1. Submitter Name/Title:**

Putri D. Kusumawati Murray, Senior Manager Licensing

**2. Email Address**

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

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**3. Organization**

Exelon Generation Co., LLC

**4. Plant Name**

Braidwood

**5. Plant Unit(s):** 1,2

**6. Need By Date**

2020-12-01

**7. Docket Number(s)**

Example: 05000313

05000456

05000457

**8. License Number(s)**

Example: DPR-51

NPF-72

NPF-77

**9. NRC Licensing Project Manager**

J. WIEBE

**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 utilize the alternative work hour controls delineated in the NRC's March 28, 2020 letter (ML 20087P237) for Braidwood Station (Braidwood) for the covered workers noted below.

The increase in COVID-19 cases in the surrounding communities could potentially impact station personnel such that Braidwood would no longer meet the work hour controls of 10 CFR 26.205(d). Therefore, EGC has determined that implementing the alternative work hour controls would allow Braidwood to proactively take steps to ensure added flexibility is available to complete necessary operations, tests, inspections, and maintenance in a manner that supports nuclear safety.

This request supports Braidwood's continuing 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 and counties surrounding Braidwood, leveraging the alternative work hour controls would facilitate further worker and community protection and ensure safe operation during the period of the exemption.

As the US 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. Braidwood's operation 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," dated March 28, 2020 (ML20087P237) the following work groups would begin phasing in on December 1, 2020 the site-specific alternative controls, as necessary, to minimize transition issues:

10 CFR 26.4(a)(1) Operators  
10 CFR 26.4(a)(2) Health Physics and Chemistry  
10 CFR 26.4(a)(3) Fire Brigade  
10 CFR 26.4(a)(4) Maintenance  
10 CFR 26.4(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.**

Braidwood's site-specific COVID-19 PHE fatigue-management controls are consistent with the constraints outlined in the referenced NRC letter and its attachment. Braidwood will continue to follow the fatigue management controls, behavioral observation requirements, and self-declaration allowances currently delineated within the EGC 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 10 CFR 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)**

2020-12-01

**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, Braidwood would implement the alternative controls described in the reference NRC letter for the management of fatigue on December 1, 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 Braidwood, an additional email supplement request may be submitted to extend the 60-day implementation exemption period.

Braidwood previous exemption from select requirements of 10 CFR Part 26 due to the potential impact of COVID-19 was approved by the NRC and was in effect between April 20, 2020 to June 19, 2020 (ML20099A519).