

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

Submitted: Nov 20, 2020

**1. Submitter Name/Title:**

Rod Penfield, Vice President, Perry Nuclear Power Plant

**2. Email Address**

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

**gjburnham@energyharbor.com**

**3. Organization**

Energy Harbor Nuclear Corp

**4. Plant Name**

Perry

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

**6. Need By Date**

2020-11-25

**7. Docket Number(s)**

Example: 05000313

05000440

**8. License Number(s)**

Example: DPR-51

NPF-58

**9. NRC Licensing Project Manager**

S. WALL

**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).**

Energy Harbor Nuclear Corp. has determined that the Perry Nuclear Power Plant personnel can no longer effectively meet the work-hour controls of 10 CFR 26.205(d) for the covered workers. Energy Harbor Nuclear Corp. only plans to implement the alternative controls when warranted by the COVID-19 conditions during the exemption period, that is, normal work hour controls would be continued or restored as conditions allow. Groups covered by the exemption request include 26.4(a)(1) Operators, 26.4(a)(2) Health Physics and Chemistry, 26.4(a)(3) Fire Brigade, 26.4(a)(4) Maintenance, and 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).**

None

**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.**

Energy Harbor Nuclear Corp. will continue to follow the fatigue management controls, behavioral observation requirements, and self-declaration allowances currently delineated within the Energy Harbor Nuclear Corp. work hour control program and procedure.

**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)**

2020-11-25

**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).**

**0700**

**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.

Should you have any questions or require additional information, please contact Mr. Glendon Burnham, Manager, Site Regulatory Compliance and Emergency Response, at (440) 280-7538.