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

Submitted: Nov 23, 2020

1. **Submitter Name/Title:**
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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**
   La Salle

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

6. **Need By Date**
   2020-12-07

7. **Docket Number(s)**
   Example: 05000313

   05000373
   05000374

8. **License Number(s)**
   Example: DPR-51

   NPF-11
   NPF-18

9. NRC Licensing Project Manager

B. PURNELL

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) and November 10, 2020 letter (ML20261H515) for LaSalle County Station (LaSalle) for the covered workers noted below.

The alternative controls will support maintaining staffing requirements as a result of recent increase in personnel absence due to COVID-19 positive test results or contact tracing quarantines that cannot be accommodated by the current work hour control requirements of 10 CFR 26.205(d)(1) through (d)(7) to support plant operational safety and security. The increase in COVID-19 cases in the state of Illinois and communities surrounding LaSalle could impact station's ability to meet the work hour controls of 10 CFR 26.205(d) in maintaining minimum staffing and ensuring adequate qualified individuals of personnel specified in 10 CFR 26.4(a)(1) through (a)(5) are available to complete necessary operations, tests, inspections, and maintenance in a manner that supports nuclear safety and security. Therefore, EGC has determined that implementing the alternative work hour controls would allow LaSalle to proactively take steps to ensure added flexibility is available to facilitate further worker and community protection and ensure safe operation during the period of the exemption.

Exemption from the 10 CFR 26.205(d)(1) through (d)(7) requirements is intended to prevent and limit the spread of COVID-19 and to mitigate its effect should LaSalle staffing be significantly impacted. LaSalle intends to use the alternative controls, where necessary, to efficiently perform operation, inspection, maintenance and testing activities that cannot be performed in accordance with the Centers for Disease Control and Prevention (CDC) recommendations related to social distancing, mask usage, worker screening, and limiting close proximity work. This practice will reduce the number of people involved in specific activities to limit the potential spread of COVID-19 and supports LaSalle's continuing efforts to maintain CDC recommendations. In addition, the alternative controls will be used to mitigate the staffing impacts should personnel absences challenge required staffing levels.

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. LaSalle'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) and NRC Letter from H. Nieh to NEI, "U.S. Nuclear Regulatory Commission Updated Planned Actions Related to Certain Requirements for Operating and Decommissioning Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency," dated November 10, 2020 (ML20261H515), the following work groups would begin phasing in on December 7, 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.

LaSalle's site-specific COVID-19 PHE fatigue-management controls are consistent with the constraints outlined in the referenced NRC letters and its attachment and enclosure. LaSalle 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)

2020-12-07

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, LaSalle would implement the alternative controls described in the referenced NRC letters for the management of fatigue on December 7, 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 LaSalle, an additional email supplement request may be submitted to extend the 60-day exemption period implementation.