

**From:** Chawla, Mahesh  
**Sent:** Wednesday, January 6, 2021 5:55 PM  
**To:** 'Elwood, Thomas B'  
**Cc:** Vazquez, Justin; Green, Brian; Bowers, Anthony; Elliott, Robert; Janicki, Steve; O'Keefe, Neil; Dixon-Herrity, Jennifer  
**Subject:** FINAL - Request for Additional Information - [COVID-19] Callaway Plant, Unit 1 - Additional Request for Exemption from Specific Requirements of 10 CFR Part 26, "Fitness For Duty Programs" - EPID L-2021-LLE-0242  
  
**Importance:** High

Dear Mr. Elwood,

By letter dated December 31, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20366A062)), you submitted additional request for exemption from specific requirements of 10 CFR Part 26, "Fitness for Duty Programs," for Callaway Plant, Unit 1. On November 17, 2020, the U.S. Nuclear Regulatory Commission (NRC) approved an exemption for work hours from requirements of 10 CFR Part 26 (ADAMS Accession No. ML20317A153). The current submittal is for extension of the currently approved work hour exemption for an additional 60 days beyond the currently established expiration date of January 16, 2021. The NRC staff is reviewing the application and has determined that the following additional information is required in order to complete the review of the subject exemption.

### **Request for Additional Information**

1. The guidance contained in the November 10, 2020 (ADAMS Accession No. ML20261H515), letter states, in part, that licensees requesting approval for a subsequent exemption should provide the following information:
  - actual hours worked during the initial exemption period of each work group for which the licensee is requesting an exemption from the work hour controls
  - the site-specific administrative controls that will be used to manage worker fatigue during the subsequent exemption period

With regards to the eight (8) security officers for whom alternate work hour controls were utilized during the initial exemption period that commenced on November 17, 2020, please provide the following information:

- During which dates were the security officers working under alternative work hour controls?
- Does the station expect to have utilized the alternative work hour controls during the fourteen (14) days prior to the requested January 16, 2021, implementation date of the subsequent exemption period? (In other words, does the station expect that they will need to utilize alternate work hours anytime between January 2 and January 15, 2021?)

- If so, what measures have been or will be taken to address the potential for cumulative fatigue among individuals for whom alternate controls will have been utilized during that 14-day period?
2. The second bullet on Page 3 of the submittal – which states that no exceedances of the work hour controls listed in 10 CFR 26.205(d)(1)-(d)(7) have occurred – appears to contradict the first bullet, which states that alternative controls were utilized for eight security officers.

Please clarify whether the alternative controls utilized for the eight officers consisted of an exceedance of the usual work hour controls outlined in 10 CFR 26.205(d)(1)-(d)(7).

3. The guidance contained in the November 10, 2020, letter states that licensees requesting approval for a subsequent exemption should provide the following:
  - the scheduled modes of operation for the reactor unit(s) during the subsequent exemption period.

Please provide this information.

4. The guidance contained in the November 10, 2020, letter states in part that alternate work hours controls should ensure the following:
  - The calculation of work hours and days off includes all work hours and days off during the applicable calculation periods, including those work hours and days off preceding initiation of the exemption period.

Please provide confirmation that the controls implemented at Callaway will ensure that this is the case.

On January 6, 2021, a teleconference was held between your representatives and the NRC staff to discuss any further clarifications needed on the requested information. In a follow up email, you stated that you will be providing the response to the RAIs on the docket by January 7, 2021. We appreciate your effort in arranging the teleconference in an expeditious manner and the discussion held with your staff. Thanking you,

Sincerely,

Mahesh Chawla, Project Manager  
 Plant Licensing Branch IV  
 Division of Operating Reactor Licensing  
 Office of Nuclear Reactor Regulation  
 U.S. Nuclear Regulatory Commission  
 ph: 301-415-8371  
 Docket No. 50-483

DORL/LPL4/PM	DORL/LPL4/BC
MChawla	JDixon-

	Herrity
01/05/2021	01/05/2021

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 957

**Mail Envelope Properties** (DM8PR09MB6853611DEA218F0B675944FBF1D00)

**Subject:** FINAL - Request for Additional Information - [COVID-19] Callaway Plant, Unit 1 - Additional Request for Exemption from Specific Requirements of 10 CFR Part 26, "Fitness For Duty Programs" - EPID L-2021-LLE-0242

**Sent Date:** 1/6/2021 5:55:14 PM

**Received Date:** 1/6/2021 5:55:00 PM

**From:** Chawla, Mahesh

**Created By:** Mahesh.Chawla@nrc.gov

**Recipients:**

"Vazquez, Justin" <Justin.Vazquez@nrc.gov>

Tracking Status: None

"Green, Brian" <Brian.Green@nrc.gov>

Tracking Status: None

"Bowers, Anthony" <Anthony.Bowers@nrc.gov>

Tracking Status: None

"Elliott, Robert" <Robert.Elliott@nrc.gov>

Tracking Status: None

"Janicki, Steve" <Steven.Janicki@nrc.gov>

Tracking Status: None

"O'Keefe, Neil" <Neil.O'Keefe@nrc.gov>

Tracking Status: None

"Dixon-Herrity, Jennifer" <Jennifer.Dixon-Herrity@nrc.gov>

Tracking Status: None

"Elwood, Thomas B" <TElwood@ameren.com>

Tracking Status: None

**Post Office:** DM8PR09MB6853.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	4245	1/6/2021 5:55:00 PM

**Options**

**Priority:** High

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**