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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Ref 10 CFR 26.9

Subject: Comanche Peak Nuclear Power Plant (CPNPP)
Docket Nos. 50-445 and 50-446
Second Supplement to Subsequent Request for Exemption from Specific Requirements of
10 CFR Part 26, "Fitness for Duty Programs"

References:

1. Vistra OpCo letter dated February 8, 2021, "Subsequent Request for Exemption from Specific Requirements of 10 CFR Part 26, 'Fitness for Duty Programs'" [ML21039A688]
2. NRC letter from H. Nieh to NEI dated November 10, 2020, "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" (ML20261H515)
3. NRC letter from Philip J. McKenna to Vistra OpCo dated December 16, 2020, "Comanche Peak Nuclear Power Plant, Unit Nos. 1 and 2 - Exemption from Select Requirements of 10 CFR Part 26 (EPID L-2020-LLE-0236 [COVID-19])" [ML20349A038]
4. Vistra OpCo letter dated February 9, 2021, "Supplement to Subsequent Request for Exemption from Specific Requirements of 10 CFR Part 26, 'Fitness for Duty Programs'" [ML21040A512]

Dear Sir or Madam:

In Reference 1, supplemented with Reference 4, Vistra Operations Company LLC (Vistra OpCo) requested a subsequent exemption from certain 10 CFR Part 26 work hour requirements for Comanche Peak Nuclear Power Plant (CPNPP) as a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE).

The following information supplements the Reference 1 submittal and the Reference 4 supplement to further address the guidance for subsequent requests detailed in the Reference 2 NRC letter.

Specifically, the following table provides information related to actual hours worked during the initial exemption period (i.e., shift duration, whether the shift is fixed or rotating, shift start and end times, pattern of days on and off, and average number of hours worked per week) of each work group for which Vistra OpCo is requesting an exemption from the work hour controls:

Positions	Shift Information
<p>26.4(a)(1) Operators</p>	<p>Operations has been following the normal online schedule during the initial exemption period. Alternative controls have not been utilized.</p> <p>Operations works a 5-week rotating 12-hour shift schedule (0630-1830/1830-0630) staffed with five independent crews: 7 days off 4 Nights Thursday – Sunday (12 hours) (3 days off) 3 Days –Thursday – Saturday (12 hours) (1 day off) Training Monday – Thursday (10.5 hours) (3 days off) 3 Nights Monday – Wednesday (12 hours) (3 days off) 4 Days Sunday – Wednesday (12 hours)</p> <p>Operations averaged 39.9 hours worked per week during the initial exemption period.</p>
<p>26.4(a)(2) Health Physics (Radiation Protection)</p>	<p>Health Physics (Radiation Protection) has been following the normal online schedule during the initial exemption period. Alternative controls have not been utilized.</p> <p>Radiation Protection works a 5-week rotating 12-hour shift schedule (0600-1800/1800-0600) staffed with five independent crews: 7 days off 4 Nights Thursday – Sunday (12 hours) (3 days off) 3 Days –Thursday – Saturday (12 hours) (1 day off) Training Monday – Thursday (10.5 hours) (3 days off) 3 Nights Monday – Wednesday (12 hours) (3 days off) 4 Days Sunday – Wednesday (12 hours)</p> <p>Radiation Protection averaged 35.5 hours worked per week during the initial exemption period.</p>
<p>26.4(a)(2) Chemistry</p>	<p>Chemistry has been following the normal online schedule during the initial exemption period. Alternative controls have not been utilized.</p> <p>10 Chemistry Technicians work a 5-week rotating 12-hour shift schedule (0600-1800/1800-0600) staffed with five independent crews: 7 days off 4 Nights Thursday – Sunday (12 hours) (3 days off) 3 Days –Thursday – Saturday (12 hours) (1 day off) Training Monday – Thursday (10.5 hours) (3 days off) 3 Nights Monday – Wednesday (12 hours) (3 days off) 4 Days Sunday – Wednesday (12 hours)</p>

Positions	Shift Information
	<p>Chemistry also has 6 Technicians working a day-shift schedule with workdays of 8, 10 or 12 hours starting at 0600: 6 days off 4 days Wednesday - Saturday (2 days off) 4 days Tuesday - Friday (2 days off) 4 days Monday - Thursday (3 days off) 4 days Monday - Thursday (3 days off) 3 days Monday - Wednesday</p> <p>Chemistry averaged 39.2 hours worked per week during the initial exemption period.</p>
<p>26.4(a)(3) Fire Brigade</p>	<p>Operations and Maintenance rotating shift members make up the Fire Brigade. The assessment for this position is included with the Maintenance and Operations information.</p>
<p>26.4(a)(4) Maintenance</p>	<p>Maintenance has been following the normal online schedule during the initial exemption period. Alternative controls have not been utilized.</p> <p>Maintenance works a 5-week rotating 12-hour shift schedule (0600-1800/1800-0600) staffed with five independent crews (typically 7 persons per crew): 7 days off 4 Nights Thursday - Sunday (12 hours) (3 days off) 3 Days -Thursday - Saturday (12 hours) (1 day off) Training Monday - Thursday (10.5 hours) (3 days off) 3 Nights Monday - Wednesday (12 hours) (3 days off) 4 Days Sunday - Wednesday (12 hours)</p> <p>The bulk of covered maintenance personnel work a nominal 10-hour day shift, Monday through Thursday typically starting at 0600.</p> <p>Maintenance averaged 37.9 hours worked per week during the initial exemption period.</p>
<p>26.4(a)(5) Security</p>	<p>Security has been following the normal schedule during the initial exemption period. Alternative controls have not been utilized.</p> <p>Security personnel typically work a fixed schedule of either Days (0700-1930) or Nights (1900-0730).</p> <p>The schedule consists of a series of shifts of either two or three days (or nights) on shift with two or three days off.</p> <p>Security averaged 39.2 hours worked per week during the initial exemption period.</p>

This communication contains no new commitments regarding CPNPP Units 1 and 2.

Should you have any questions, please contact Jim Barnette at (254) 897-5866 or James.barnette@luminant.com.

Sincerely,



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