

From: Hon, Andrew
Sent: Friday, October 1, 2021 9:17 AM
To: Yodersmith, Stephen B; Turkal, Mark A; Grzeck, Lee
Cc: Wrona, David; Buchanan, Theresa; Tindell, Brian; Cowdrey, Christian
Subject: Request for additional information - Brunswick Exemption Request from 10CFR 55.47 License Operator Exam Two-year Waiver Limit (EPID: L-2020-LLE-0035)

By an application dated [July 29, 2021](#) and supplemented on [August 26, 2021](#), (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML21211A003](#) and [ML21238A332](#)), Duke Energy Progress, LLC submitted the subject exemption request for Commission review and prior approval pursuant to Section 55.11 of Title 10 of the *Code of Federal Regulation*.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The proposed questions below were discussed by e-mail with your team on [September 30, 2021](#). Your team confirmed that the request for additional information (RAI) was understood; it does not contain sensitive information; and agreed to provide a response by [October 31, 2021](#).

The NRC staff considers that timely responses to RAIs help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. Please note that if you do not respond to this request by the agreed-upon date or provide an acceptable alternate date, we may deny your application for amendment under the provisions of Title 10 of the *Code of Federal Regulations*, Section 2.108. If circumstances result in the need to revise the agreed upon response date, please contact me.

Andy Hon, PE

*Project Manager (Brunswick Nuclear Plant 1 & 2, Duke Energy Progress Fleet)
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
301-415-8480
OWFN 08E06
Mail Stop 08B1A
andrew.hon@nrc.gov*

REQUESTS FOR ADDITIONAL INFORMATION

Regulatory Bases:

In accordance with 10 CFR 55.11, one of the conditions for the Commission granting an exemption from the regulations in 10 CFR Part 55 is when the exemption is otherwise in the public interest.

Issue:

The licensee's application stated that the exemption request will be part of ongoing efforts to avoid excessive use of operator overtime. The licensee stated that fatigue rule waivers of one or more work hour controls, per 10 CFR 26.207, "Waivers and exceptions," to maintain operator shift staffing would be needed. The licensee also stated that Brunswick has a class of 30 licensed operator candidates with a currently scheduled December 2022 examination date. For the exemption request to be otherwise in the public interest, the expected date of the fatigue rule waivers should be prior to the expected date of licensing for the applicant if the applicant were to take the December 2022 examination.

Specific Information Requested:

The approximate expected date of the fatigue rule waivers requests.

Hearing Identifier: NRR_DRMA
Email Number: 1372

Mail Envelope Properties (DM8PR09MB631188C6A81887690237BC9099AB9)

Subject: Request for additional information - Brunswick Exemption Request from 10CFR
55.47 License Operator Exam Two-year Waiver Limit (EPID: L-2020-LLE-0035)
Sent Date: 10/1/2021 9:17:10 AM
Received Date: 10/1/2021 9:17:00 AM
From: Hon, Andrew

Created By: Andrew.Hon@nrc.gov

Recipients:

"Wrona, David" <David.Wrona@nrc.gov>
Tracking Status: None
"Buchanan, Theresa" <Theresa.Buchanan@nrc.gov>
Tracking Status: None
"Tindell, Brian" <Brian.Tindell@nrc.gov>
Tracking Status: None
"Cowdrey, Christian" <Christian.Cowdrey@nrc.gov>
Tracking Status: None
"Yodersmith, Stephen B" <Stephen.Yodersmith@duke-energy.com>
Tracking Status: None
"Turkal, Mark A" <Mark.Turkal@duke-energy.com>
Tracking Status: None
"Grzeck, Lee" <Lee.Grzeck@duke-energy.com>
Tracking Status: None

Post Office: DM8PR09MB6311.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2788	10/1/2021 9:17:00 AM

Options

Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date: