

From: Green, Kimberly
Sent: Monday, April 25, 2022 7:44 AM
To: Rymer, Stuart Loveridge
Cc: Wrona, David; Wells, Russell Douglas; Eckermann, Jeremy Beau
Subject: Requests for Confirmation of Information and Additional Information Regarding Watts Bar Nuclear Plant, Unit 2 Exemption Request re 10 CFR Part 26 (L-2022-LLE-0017)
Attachments: Final RCIs and RAIs 04-25-22.docx

Dear Mr. Rymer,

By letter dated April 15, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22105A579), the Tennessee Valley Authority (TVA) requested exemptions (1) from Title 10 of the *Code of Federal Regulations* (10 CFR) Section 26.205(d)(7) to use the less restrictive work hour limitations described in 10 CFR 26.205(d)(4) for no more than 60 days beyond the end of the current 60-day allowance for Category A personnel, and (2) from 10 CFR 26.205(d)(6) for Category B personnel to allow them to perform normal outage shutdown, startup, maintenance, fuel handling, and modification activities that are not related to the steam generator replacement project.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has identified areas where confirmation of information or additional information is needed to complete its review.

A draft request for confirmation of information (RCI) and additional information (RAI) was previously transmitted to you by email dated April 22, 2022. You have indicated that a clarification call is not needed.

Due to the expedited nature of TVA's request, a response to the attached RCI and RAI is requested by close of business today, April 25, 2022.

If circumstances result in the need to revise the requested response date, please contact me at (301) 415-1627 or via email at Kimberly.Green@nrc.gov.

Sincerely,
Kimberly J. Green, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Hearing Identifier: NRR_DRMA
Email Number: 1607

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From: Green, Kimberly

Created By: Kimberly.Green@nrc.gov

Recipients:

"Wrona, David" <David.Wrona@nrc.gov>
Tracking Status: None
"Wells, Russell Douglas" <rdwells0@tva.gov>
Tracking Status: None
"Eckermann, Jeremy Beau" <jbeckermann@tva.gov>
Tracking Status: None
"Rymer, Stuart Loveridge" <slrymer@tva.gov>
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REQUEST FOR CONFIRMATION OF INFORMATION AND

REQUEST FOR ADDITIONAL INFORMATION AND

WATTS BAR NUCLEAR PLANT, UNIT 2

DOCKET NO. 50-391

EXEMPTION REQUEST RELATED TO 10 CFR PART 26 WORK HOURS

By letter dated April 15, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22105A579), the Tennessee Valley Authority (TVA) requested exemptions (1) from Title 10 of the *Code of Federal Regulations* (10 CFR) Section 26.205(d)(7) to use the less restrictive work hour limitations described in 10 CFR 26.205(d)(4) for no more than 60 days beyond the end of the current 60-day allowance for Category A personnel, and (2) from 10 CFR 26.205(d)(6) for Category B personnel to allow them to perform normal outage shutdown, startup, maintenance, fuel handling, and modification activities that are not related to the steam generator replacement (SGR) project.

The U.S. Nuclear Regulatory Commission (Commission, NRC) staff is reviewing your submittal and has identified areas where additional information or confirmation of information is needed to complete its review.

Request for Confirmation of Information:

1. Regarding Category B personnel, the NRC staff's understanding of TVA's request is as follows:
 - TVA is requesting that Category B personnel be allowed to work extended hours for a 60-day period of time that would commence upon completion of the SGR project schedule milestone for "polar crane turnover to the plant." This requested 60-day time period would be treated as administratively separate from the first 60 days of the unit outage that initially began on March 1, 2022.
 - During this administratively established 60-day period, Category B personnel would be permitted to resume work schedules that include more hours per week than the number of hours per week permitted during normal unit operations in accordance with 10 CFR 26.205(d)(7). However, during this 60-day period, Category B personnel would be provided the minimum number of days off that would be required during the first 60 days of a unit outage, in accordance with 10 CFR 26.205(d)(4).
 - TVA would potentially have the opportunity to extend the administratively established 60-day period for Category B personnel, in accordance with the limitations discussed in 10 CFR 26.205(d)(6). If TVA were to administer such an extension, then when calculating the allowed duration of the extension for these individuals, TVA would consider the hours worked by those individuals during the administratively established 60-day period (as opposed to considering the hours worked during the first 60 days of the unit outage that began on March 1, 2022).

- The exemption for Category B personnel would end when the Watts Bar, Unit 2 generator is synced to the electrical grid, and TVA would resume control of work hours in accordance with 10 CFR 26.205(d)(7).

Based on the NRC staff's understanding, as described above, an exemption would be needed from 10 CFR 26.205(d)(7) to allow for normal work hour controls to be relaxed during the administratively established 60-day time period.

Confirm that the NRC staff's understanding, as described above, is correct regarding the exemption request, as it applies to Category B personnel.

2. Regarding Category A personnel, the NRC staff's understanding of TVA's request is that the following condition would apply:
 - When the Watts Bar, Unit 2 generator is synced to the electrical grid, the exemption for Category A personnel would end at that time, and TVA would resume control of work hours for these personnel in accordance with 10 CFR 26.205(d)(7).

Confirm that the NRC staff's understanding, as described above, is correct regarding the exemption request, as it applies to Category A personnel.

Request for Additional Information:

1. Section 26.9 of 10 CFR states, in part, that the Commission may grant exemption from the requirements in 10 CFR Part 26 as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest.

To support the NRC's determination as to whether the requested exemption would be otherwise in the public interest, NRC staff are seeking clarification regarding the extent to which TVA took reasonable measures to recognize and mitigate the challenges that necessitated this requested exemption from regulatory requirements. To address this consideration, provide the following information:

- a. Explain what margin, if any, was incorporated into the scheduling of work for the SGR project to account for potential weather-related delays. Specifically, explain how seasonally expected weather conditions were considered when establishing margin within the schedule, and explain why the weather delays that occurred could not have been reasonably anticipated and planned for in the outage schedule.
- b. Explain why the issues that led to the emergent discovery delays listed in Table 4 could not reasonably have been identified and resolved prior to the commencement of the refueling outage.
- c. Describe any other factors, beyond those discussed in the responses to items a and b above, that reasonably affected TVA's ability to conduct planning in a rigorous/thorough manner to allow for identification of potential issues ahead of time.

2. Section 26.9 of 10 CFR states, in part, that the Commission may grant exemption from the requirements in 10 CFR Part 26 as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest.

Section VI of the submittal states the following:

“The added flexibility will provide additional safety margin. There is no negative impact to the public interest as a result of this exemption request while the benefit to the affected employees will result in a positive impact to the public interest.”

Provide additional details to support this statement, addressing the following:

- a. Given that the normal outage-related limits on work hours are intended to provide scheduling flexibility that is reasonable to support outage activities while still preventing the unsafe accumulation of fatigue, explain how the added flexibility under the requested exemption would provide additional safety margin.
- b. Discuss how the requested exemption is expected to result in benefit to the affected employees, considering that they will be working under extended work-hour conditions.
- c. Discuss any other factors that may have been considered that justify why the requested exemption would be in the public interest.