

## **NRC FFD Program Performance Data Reporting 10CFR Part 26 – FM**

*This attachment provides the entire narrative as the NRC form has been created with boxes that scroll down, and when printed, the information prints very small due to the way the NRC has built the electronic Fatigue Management form.*

### **Analysis of Waiver Assessment Data:**

Wolf Creek reported 2 waivers in 2020. Waivers: CR search in in the corrective action system documented 2 CR's for 2 waivers. CR0014414 Work hour limitation waiver and CR00143425 work hour limitation waiver. Both waivers were for the same maintenance supervisor that was needed oversee an emergent job for 2 days during the same week.

6/26/2020 waive 16 hours in 24 hours and waive 26 hours in 48 hours

(1900-2300 hours worked under waiver)

6/28/2020 waive 72 hours in 7 days

(0745 to 1130 hours worked under waiver)

Fatigue assessment and waiver forms completed per procedure. Additional note about waivers: The equipment failure resulted in the station entering a 72-Hour Limiting Condition of Operation for the loss of one train of Emergency AC Power. The degradation of this safety function elevated station risk. If the repair would not have been completed within the allowed time, the unit would have been required to shut down and commence a cooldown to Mode 5. The location of the failed supply fan presented unique rigging challenges to support the required motor replacement. The individual affected by this waiver is the station Subject Matter Expert and Program Owner for site rigging. The rigging evolution was complex, high-risk, infrequent and was required to be completed on short notice. There was no other individual on-site who could have delivered the same level of expert guidance and oversight of the evolution. Of note, the evolution was completed without error or injury. After reviewing the waiver data, no additional actions are deemed necessary.

### **Analysis of Fatigue Assessment Data:**

10 CFR 26.205 (e), Reviews – Licensees shall evaluate the effectiveness of their control of work hours of individuals who are subject to this section. Licensees shall conduct the reviews once per calendar year.

6 fatigue assessments were performed in 2020.

Self-declaration, 2 for post event, 2 for waivers and 1 for-cause

Self-declaration 3/10/2020 security online CR 00141190 management actions: fatigue assessment to document self-declare.

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Post-event 5/9/2020 security online. Covered worker. CR 00142482 Management actions: fatigue assessment completed, and worker sent home for min. 10-hour break pending FFD test results.

Post-event 5/18/2020 strategic engineering online. Not a covered worker. CR 00142663 management actions: post event fatigue assessment completed badge put on hold and worker sent home pending FFD results.

Waiver 6/26/2020 maintenance online. Covered worker. CR00143425 management action: fatigue assessment completed.

Waiver 6/28/2020 maintenance online. Covered worker. CR00143414 management action: fatigue assessment completed.

For-cause 8/5/2020 maintenance online. Covered worker. CR 00144265 management actions: fatigue assessment completed, and worker sent home pending FFD test results.

Fatigue assessments are being completed by the individual as required and by a qualified and trained fatigue assessor accurately and thoroughly.

### **Conclusions:**

Fatigue assessment conclusion – in review of each performed fatigue assessments no concerns were noted for issues with fatigue or work hours from the data documented by the individuals being assessed.

Waiver conclusion – in review of 6/26/2020 and 6/28/2020 waivers written for maintenance supervisor (site owner for site rigging) no concerns are noted in use of waivers to extend work hours and no concerns were noted from review of fatigue assessments.

### **Summary and Status of Corrective Actions:**

The 2020 Fatigue Management Annual Program Review (QH-2021-2132) documented no concerns, trends, or performance gaps for fatigue management. The areas assessed in this Program Review were - work hours, planned and unplanned outages, work hour tracking, fatigue assessments and internal operating experience (condition reports).