

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:

Waiver Issuance and Waiver Distribution only applies to covered workers. Five (5) maintenance covered workers will be annotated on this NRC form. The waivers occurred while the plant was on-line.

Waivers were performed for 5 covered maintenance workers on 07/27/2021. Fatigue assessments for waivers were in support of a high angle rescue team, work effort.
07/27/2021 waive 16 hours in 24 hours and waive 26 hours in 48 hours.
(1100 07/27/2021 to 0400 on 07/28/2021 hours worked under waiver)

Fatigue Assessment and Waivers were issued appropriately, and procedure guidance was followed. Minor administrative errors were noted on fatigue assessment and waiver form completion. Procedure change requests were initiated for the Fatigue Assessment and Waiver forms to assist end user in form performance.

Analysis of Fatigue Assessment Data:

2021 Fatigue Assessments meeting 10 CFR Part 26 criteria:
02/01/2021: (uncovered worker) For Cause Plant Status: Online
02/22/2021: (covered worker) Post-Event Plant Status: Online
03/23/2021: (uncovered worker) Post-Event Plant Status: Online
07/27/2021: (5 covered workers) Waiver Plant Status: Online

In review of the performed fatigue assessments no concerns are noted for fatigue or work hours as documented by individuals being assessed.

A procedure change request has been initiated for the Fatigue Assessment form to revise some sections of the form to make form a little bit clearer for the end user to complete.

Conclusions:

The site continues to effectively monitor and manage the fatigue rule in review of performed waivers and fatigue assessments.

Summary and Status of Corrective Actions:

Topic 1 - For 2021 maintenance incurred three (3) work hour violations for three (3) individuals in November. Maintenance initiated a trend condition report CR 100010917 to address this concern.

Actions taken: The manager of maintenance is to provide training on this issue and give clear and specific guidance on regulatory requirement to not violate NRC work hour rules. Due date is 4/28/2022.

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Topic 2 – (Historical) The 2021 NRC fitness for duty inspection exit meeting, the lead inspector indicated he would be documenting in the inspection report a licensee-identified, Green non-cited violation (NCV) of 10 CFR 26.31(c)(3) which requires that as soon as practical after an event involving a human error, where the human error may have caused or contributed to the event, the licensee or other entity shall test the individual(s) who committed the error(s). Contrary to this, QA audit 18-09-FFD/FM identified that Fatigue Assessments were not performed on 4/12/2018 and 6/21/18. Licensee-identified NCVs are not assigned cross-cutting aspects. CR 10127487 was written for the original issue identified by QA. CR 10001396 was written to track this violation.

Action taken: In 2018 the post-event section of the For-Cause /Post Event/Fatigue Determination form (APF 01A-001-02) was revised and aligned to 10 CFR 26 requirements. This action provides clear and specific guidance and upon a current review, no additional issues were discovered.

Topic 3 - During RF24, Maintenance scaffold leads were loaned to Engineering Projects to support scaffold activities. Projects leadership had the responsibility for assigning outage schedules and admin codes to apply outage rules and approve timesheets in EmpCenter. It was recognized that 2 Maintenance Support employees that were on-loan to Projects during RF24 were assigned daily schedules at the end of RF24; however, they were left on outage rules. Outage rules are not as conservative as on-line rules and are only to be applied when we are off-line. The appropriate Admin Code was applied, and the timesheets were re-approved, which allowed verification that no work hour violations occurred during this time.

Actions taken: CR 10008832 Event shared with all work hour tracking timekeepers to raise awareness of the importance in task completion and verification for loaned individuals.

General Comments:

The 2021 Fatigue Management Program Review did not document any performance gaps or additional issues. (Reference QH-2022-2296, 10 CFR Part 26 Fatigue Management Assessment)

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).