

From: [Kimberly Green](#)
To: [Eckermann, J Beau](#)
Cc: [Aboufaiida, Amber Vendel](#); [ext Andrew Taylor](#)
Subject: Audit Plan Related to the Review of the Sequoyah Nuclear Plant, Unit 1, Exemption Request re Work Hours (EPID L-2026-LLE-0024)
Date: Tuesday, June 9, 2026 3:01:00 PM
Attachments: Audit Plan - SQN Unit 1 Part 26 Exemption.pdf

Dear Mr. Eckermann:

By letter dated May 14, 2026 (Agencywide Documents Access and Management System Accession No. ML26134A388), pursuant to Section 26.9, "Specific exemptions," of Title 10 of the *Code of Federal Regulations* (10 CFR), the Tennessee Valley Authority (TVA) requested a one-time exemption to allow the use of less restrictive work hour limitations in 10 CFR 26.205(d)(4) at Sequoyah Nuclear Plant, Unit 1, for the spring 2027 refueling outage.

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the exemption request and has determined that a regulatory audit will aid in the NRC staff's review of TVA's request.

Attached, please find an audit plan that identifies audit questions, audit team members, and logistics. The deliverable for this audit will be an audit summary report that will be issued on or before the issuance of any amendments related to this request.

The NRC staff requests an audit call at the earliest convenience for TVA to discuss the audit questions identified in the attached audit plan.

The NRC staff is available on the following dates/times:

June 15: 1:00 pm, 2:00 pm

June 16: 2:00 pm

June 17: 10:00 am, 1:00 pm, 3:00 pm

June 18: 10:00 am, 11:00 am, 3:00 pm

Please let me know if any of the dates/times above are convenient for TVA.

Sincerely,

Kimberly Green

Senior Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
301-415-1627

OFFICE OF NUCLEAR REACTOR REGULATION AUDIT PLAN

This audit is being conducted to gain an understanding, verify information, and/or identify information that should be docketed to support the NRC staff's regulatory decision. The audit will be conducted in accordance with NRR Office Instructions LIC-111, "Regulatory Audits."			
EPID No.	L-2026-LLE-0024		
Project Name	Exemption from 10 CFR 26.205 re Work Hours		
Application Date	05/14/2026	Accession No.	ML26134A388
Licensee	Tennessee Valley Authority	Docket No(s).	50-327
Type of Audit	<input type="checkbox"/> In Person	<input checked="" type="checkbox"/> Virtual/Remote Desktop	
If virtual/remote audit is selected, the audit will be conducted using a secure, online electronic portal established by the licensee or its vendor. The portal must be password protected or secured by use of multifactor authentication. The portal must prevent NRC participants or its contractors from printing, saving, copying, downloading, and collecting any information directly from the portal. Conditions of the use of the portal should be displayed at the login screen or appropriate location and acknowledged by each NRC participant or its contractor. Login information should be provided directly to the individuals listed in the Audit Teams Member Section below.			
Audit Start Date	TBD	Audit End Date	6/19/2026
Audit Team Members (List Names and E-mail addresses)			
Name/Position		Email	
Kimberly Green, Project Manager		Kimberly.Green@nrc.gov	
Kamishan Martin, Technical Reviewer		Kamishan.Martin@nrc.gov	
Amy D'Agostino, Team Leader		Amy.D'Agostino@nrc.gov	

Audit Documents or Questions

Questions:

1. Page E1-2 of 8 states:

TVA plans for these Category C personnel to perform covered work under the less restrictive work hour rules allowed in 10 CFR 26.205(d)(4) for approximately the first 10 days of U1R28. Following a minimum 34-hour break, they will then transition to BFN U2R24, which starts a new 10 CFR 26.205(d)(4) 60-day clock. Following completion of BFN U2R24, TVA plans for these Category C personnel to receive a minimum of three consecutive days off before transitioning to SQN to support U1R28 outage activities under the outage work hour rules of 10 CFR 26.205(d)(4).

Page E1-3 of 8 in the submittal states:

The period of the proposed exemption would commence immediately following expiration of the initial 10 CFR 26.205(d)(4) 60-day period of U1R28, applicable for a period not to exceed an additional 60 days.

Confirm that the requested exemption period for both Category B and Category C personnel would commence immediately following expiration of the initial 10 CFR 26.205(d)(4) 60-day period of U1R28, applicable for a period not to exceed an additional 60 days .

2. The exemption request describes how Category B personnel transition to online averaging work hours after the first 10 days of U1R28. For this period, will these individuals be working 48 hours or less per week?
3. For Category C personnel, individuals will begin BFN outage work with a minimum of 34 hours continuous break for the transition period. The 34-hour break is the standard break for workers who are starting outage work when the units are different or the sites are different and the licensee does not have access to the previously worked hours. The conditions for this exemption request are slightly different as all the workers are working for TVA for both sites and thus the previously worked hours at SQN are available. These individuals will begin the transition to BFN after approximately 10 days. The exemption request states the BFN outage work will begin early March. It appears that there will be a few days between the first 10 days and the beginning of BFN outage work. Is there a consideration for a break longer than the minimum of 34-hours?
4. In accordance with TVA procedures and the outage oversight plan, the cognizant supervisors will monitor each assigned supervised employee for fatigue and mental alertness prior to performing covered work. Will there be additional fatigue assessments or supervisor observations during the period of the proposed exemption? Will the assessments of each assigned supervised employee for fatigue and mental alertness be conducted for each shift, periodically, a set percentage of the individuals, or randomly practiced or as needed?

The NRR Project Manager will inform the licensee of the entrance and exit meeting dates when they are established. The Project Manager will coordinate with the licensee to set dates and times to discuss information needs and questions arising from the NRC's audit of the information. The NRC staff may change and/or add audit dates and times when deemed necessary.