

From: Rankin, Jennivine
Sent: Wednesday, January 8, 2020 12:28 PM
To: Vogtle PEmails
Subject: WORK HOUR RULE PRESENTATION
Attachments: Work Hour Control Presentation for Jan 9 Meeting.pdf

For Vogtle public meeting on 1/9/2020.

From: Leighty, Steven <sleighty@southernco.COM>
Sent: Wednesday, January 08, 2020 11:40 AM
To: Roberts, Kelli Anne <KROBERTS@southernco.com>; Rankin, Jennivine <Jennivine.Rankin@nrc.gov>
Subject: [External_Sender] RE: RE: Re: Potential item for the 1/9 public meeting - WORK HOUR RULE PRESENTATION

Jennie,

Here is the presentation for tomorrow.

Thanks,

Steve Leighty | Southern Nuclear

Licensing Supervisor | Vogtle 3&4

706.848.6790 | sleighty@southernco.com

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 516

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Subject: WORK HOUR RULE PRESENTATION
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From: Rankin, Jennivine

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Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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SNC Plan for Implementing Work Hour Rule

Background

- Fatigue management and work hour controls are described in 10 CFR 26 Subpart I
- UFSAR Table 13.4-201 describes implementation milestones for FFD Programs
 - Work hour controls (10 CFR 26.205 – 26.209) implementation are clear for security personnel
 - Work hour controls (10 CFR 26.205 – 26.209) implementation for operations is based on job duty
- Work hour controls for operations and maintenance are for risk significant SSCs
 - Many SSCs will not be risk significant until after fuel load
 - NEI 06-11 – risk significant SSCs are those that have a risk informed evaluation process (PRA analysis) shown to be “significant to public health and safety”
 - RG 1.22 – the risk-informed evaluation process applies to at power models
 - Supports a phased implementation strategy, if desired



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Implementation Milestones for Fatigue Management and Work Hour Controls

Job Duties	Fatigue Management	Work Hour Controls
Anyone with unescorted access to the PA/SNMPPP area and does not perform one of the 5 functions below	Establishment of a protected area	Never applies
EP Personnel (Those who are required to report to TSC/EOF)	Establishment of a protected area	Never applies
Anyone with unescorted access to the PA/SNMPPP area and Operating or on-site directing of the operation of structures, systems and components (SSCs) that a risk-informed evaluation process has shown to be significant to public health and safety.	Establishment of a protected area	Fuel Load
Anyone with unescorted access to the PA/SNMPPP area and Performing maintenance on or on-site directing of the maintenance of SSCs that a risk-informed evaluation process has shown to be significant to public health and safety.	Establishment of a protected area	Fuel Load
Anyone with unescorted access to the PA/SNMPPP area and Performing health physics or chemistry duties required as a member of the on-site emergency response organization's minimum shift complement.	Establishment of a protected area	Fuel Load
Anyone with unescorted access to the PA/SNMPPP area and Performing the duties of a fire brigade member who is responsible for understanding the effects of fire and fire suppressants on safe shutdown capability.	Establishment of a protected area	Fuel Load
Anyone with unescorted access to the PA/SNMPPP area and Performing security duties as an armed security force officer, alarm station operator, response team leader, or watchperson, hereinafter referred to as security personnel.	Establishment of a protected area	Establishment of a protected area



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