

Date: April 2, 2020

To: Venkataiah Sreenivas, NRC Project Manager

CC: Jigar Patel, LGS Senior Resident Inspector, Jonathan Greives, Div. Reactor Projects Branch Chief

Reference: NRC Letter from H. Nieh to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for Work Hour Controls During the Coronavirus Disease 2019 Public Health Emergency," March 28, 2020

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) the Limerick Generating Station, Units 1 and 2 (LGS) is requesting NRC approval to proactively enter into the alternative work hour controls delineated in the Reference letter. By implementing the alternate work hour controls, LGS is proactively taking steps to complete necessary work, testing, and inspections in a manner that supports worker and neighboring community safety to limit the spread of the COVID-19 virus. This request is being made to support the LGS efforts to maintain Center for Disease Control recommendations related to social distancing, worker screening, and limiting close-proximity work. Particularly given the COVID-19 challenge in the immediate community of LGS, leveraging the alternative work hour controls will facilitate further worker and community protection as we perform the current outage and subsequent operation safely and efficiently.

As the US Departments of Homeland Security and Energy have stated in their guidance, the electric grid and nuclear plant operation make up the nation's critical infrastructure similar to the medical, food, communications, and other critical industries. LGS's operation and outage must be conducted such that the plant is available when needed, including during the critical peak summer loads.

In accordance with the Reference letter, the following information is provided in the table below:

- As a preventive measure to reduce the vulnerability and spread of the COVID-19 virus, this request is proactively being submitted to apply the alternate work hour rules described in the Reference letter for the positions described in § 26.4(a)(1) – (5) as stated in the table below.
- LGS will implement the alternative controls upon verbal NRC approval as stated in the Table below.

	Positions	Compliance	Begin Implementation
26.4(a)(1)	Operators	Will phase in site-specific alternative controls as defined in the Reference letter, as necessary, to minimize transition issues.	Upon NRC Approval
26.4(a)(2)	Health Physics and Chemistry	Will phase in site-specific alternative controls as defined in the Reference letter, as necessary, to minimize transition issues.	Upon NRC Approval
26.4(a)(3)	Fire Brigade	Will phase in site-specific alternative controls as defined in the Reference letter, as	Upon NRC Approval

		necessary, to minimize transition issues.	
26.4(a)(4)	Maintenance	Will phase in site-specific alternative controls as defined in the Reference letter, as necessary, to minimize transition issues.	Upon NRC Approval
26.4(a)(5)	Security	Will phase in site-specific alternative controls as defined in the Reference letter, as necessary, to minimize transition issues.	Upon NRC Approval

LGS will continue to follow the fatigue management controls, behavioral observation requirements, and self-declaration allowances currently delineated within the Exelon work hour control program and procedures (LS-AA-119, SY-AA-102, SY-AA-103-500).

Upon NRC verbal approval, LGS will implement the alternative controls described below and discussed in the Reference letter for the management of fatigue during the period of the exemption. These controls ensure that covered workers are subjected to the following minimum controls:

- (1) not more than 16 work-hours in any 24-hour period and not more than 86 work-hours in any 7-day period, excluding shift turnover;
- (2) a minimum 10-hour break is provided between successive work periods;
- (3) 12-hour shifts are limited to not more than 14 consecutive days;
- (4) a minimum of 6-days off are provided in any 30-day period; and
- (5) requirements are established for behavioral observation and self-declaration during the period of the exemption.

As described above, the requirements of 10 CFR 26.23, "Behavioral observation"; 10 CFR 26.209, "Self-declarations"; and 26.211, "Fatigue assessments" remain in effect during the period of the exemption. These requirements provide reasonable assurance that should personnel become impaired due to fatigue, requirements and processes are in place to identify the impairment through observation by plant staff or by worker self-declaration, and to assess and address instances of impairment through fatigue assessments.

In order to expedite implementation of the safety benefits of the alternate controls, LGS requests verbal approval of this request. We understand this will be followed up by a written confirmation.

Respectfully,



David T. Gudger
Sr. Manager - Licensing
Exelon Generation Company, LLC