

To: Venkataiah Sreenivas, NRC Project Manager
Document Control Desk

CC: J. Schussler, Ginna 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) Exelon Generation Company, LLC (EGC) has proactively determined that R.E. Ginna Nuclear Power Plant (Ginna) can no longer meet the work-hour controls of 10 CFR 26.205(d) for the covered workers noted below. By implementing the alternate work hour controls, Ginna 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 Ginna efforts to maintain Centers for Disease Control and Prevention recommendations related to social distancing, worker screening, and limiting close-proximity work. Particularly given the COVID-19 challenge in the immediate community of Ginna, implementing 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 are a part of the nation's critical infrastructure similar to the medical, food, communications, and other critical industries. Ginna'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 Referenced letter, the following information is provided in the table below:

- Positions (as described in § 26.4(a)(1) – (5)) for which either current work-hour controls will be maintained, or for which alternative controls will be required as a preventive measure.
- The date and time for which alternative controls will be implemented for the listed positions as identified in the Table below.

	Positions	Compliance	Begin Implementation
26.4(a)(1)	Operators	Will phase in site-specific alternative controls as defined in the Referenced 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 Referenced 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 Referenced letter, as necessary, to minimize transition issues.	Upon NRC Approval
26.4(a)(4)	Maintenance	Will phase in site-specific alternative controls as defined in the Referenced 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 Referenced letter, as necessary, to minimize transition issues.	Upon NRC Approval

Ginna's site-specific COVID-19 PHE fatigue-management controls are consistent with the constraints outlined in the Reference letter and its attachment. Ginna will continue to follow the fatigue management controls, behavioral observation requirements, and self-declaration allowances currently delineated within the EGC work hour control program and procedures (LS-AA-119, SY-AA-102, SY-AA-103-500).

Upon NRC verbal approval, Ginna will implement the alternative controls described below and consistent with the Referenced 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.

The requirements of 10 CFR 26.33, "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.

Upon NRC approval, Ginna will implement the alternative controls described in the Reference Letter for the management of fatigue during the initial period of 60 days. Near the end of the 60 day period, if COVID-19 pandemic conditions persist at the site affecting staffing requirements and the efforts to maintain Center for Disease Control, state and local recommendations related to social distancing, worker screening, and limiting close-proximity work, as well as of particular

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concern is the COVID-19 challenge in the immediate community of Ginna, an additional email supplement request may be submitted to extend the 60-day implementation period exemption.

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

Respectfully,

A handwritten signature in dark ink, appearing to read "David T. Gudger". The signature is fluid and cursive, with the first name "David" being the most prominent part.

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