



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 20, 2022

LICENSEE: Tennessee Valley Authority

FACILITY: Watts Bar Nuclear Plant, Unit 2

SUBJECT: SUMMARY OF APRIL 12, 2022, MEETING WITH TENNESSEE VALLEY
AUTHORITY REGARDING A PROPOSED EXEMPTION REQUEST FOR
WATTS BAR NUCLEAR PLANT, UNIT 2 (EPID L-2022-LRM-0032)

On April 12, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an observation meeting with representatives of the Tennessee Valley Authority (TVA). The purpose of the meeting was to discuss TVA's proposed exemption request for Watts Bar Nuclear Plant (Watts Bar), Unit 2.

The meeting notice and agenda, dated April 8, 2022, are available at Agencywide Documents Access and Management System (ADAMS) Accession No. ML22098A108. TVA's presentation slides for the meeting are available at ADAMS Accession No. ML22102A303. A list of participants is enclosed.

TVA stated that it plans to request a one-time exemption from certain requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 26, "Fitness for Duty Programs," for Watts Bar, Unit 2. Specifically, TVA plans to request an exemption from 10 CFR 26.205(d)(4) that would allow the use of less restrictive work hours limitations to support the Watts Bar, Unit 2 steam generator replacement (SGR) outage activities. TVA stated that this exemption would apply to Category A personnel, who are individuals directly performing or supporting SGR project activities. These individuals include pipefitters, boilermakers, operating engineers, and iron workers. TVA also plans to request an exemption from portions of 10 CFR 26.205(d)(6) for Category B personnel, who are personnel that perform normal outage shutdown startup, maintenance, fuel handling, and modification activities that are not related to the SGR project.

TVA explained that Watts Bar, Unit 2 entered an SGR outage on March 1, 2022, and was originally planned to conclude in mid-May 2022. However, due to weather delays, emergent discovery issues, and delays in site access for outage workers, TVA now expects the outage to conclude in early June. TVA stated that the revised outage schedule does not account for any additional weather delays or emergent discovery issues. Therefore, TVA will request a one-time 60-day exemption to permit the reduction of the minimum number of days off for workers, in a manner typically allowed in accordance with 10 CFR 26.205(d)(4) and 10 CFR 26.205(d)(6), to continue beyond the end of the current 60-day period. This exemption period would end no later than June 29, 2022.

The NRC staff asked TVA for additional details about the weather-related delays and site access challenges. TVA clarified that the site experienced high winds, rain, and also snow and ice in the beginning of March. The weather caused approximately 285 hours in delays. In regard to the site access challenges, TVA stated that it was not able to process all of the site

badges prior to March 1st, and as of March 15th, 400+ workers still needed to be granted site access (i.e., get badged).

TVA cited three precedents where the NRC approved exemption requests that are similar: (1) D.C. Cook Nuclear Plant, Unit 1 (ADAMS Accession No. ML092630003), (2) Davis-Besse Nuclear Power Station, Unit 1 (ADAMS Accession No. ML101730457), and (3) Fort Calhoun Station, Unit 1 (ADAMS Accession No. ML13274A025). The NRC staff suggested that TVA might also want to review the temporary guidance that the NRC issued for COVID-19-related requests for exemption from the Part 26 work hour control requirements (ADAMS Accession Nos. ML20087P237 and ML20261H515), which may contain additional information that TVA could consider when discussing the technical justification for their request to support the NRC staff in its timely review. However, the NRC staff also cautioned TVA that this guidance was intended to address circumstances related to a declared public health emergency, and that it may not be applicable, in its entirety, to TVA's circumstances. The NRC staff also recommended that TVA consider if an exemption request from 10 CFR 26.205(d)(7) might also be needed.

The NRC staff asked if the exemption request would include security personnel. TVA stated that security personnel are not included in the exemption request because they will remain on a normal work schedule.

TVA plans to submit the request to the NRC by April 15, 2022, and will request approval by April 30, 2022.

No regulatory decisions were made at this meeting.

Please direct any inquiries to me at 301-415-1627 or by e-mail to Kimberly.Green@nrc.gov.

/RA/

Kimberly J. Green, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-391

Enclosure:
List of Participants

cc: Listserv

LIST OF PARTICIPANTS

APRIL 12, 2022, PUBLIC MEETING WITH TENNESSEE VALLEY AUTHORITY

REGARDING PROPOSED EXEMPTION REQUEST FOR

WATTS BAR NUCLEAR PLANT, UNIT 2

<u>Name</u>	<u>Affiliation</u>
Kim Green	U.S. Nuclear Regulatory Commission (NRC)
Brian Green	NRC
Justin Vazquez	NRC
Wesley Deschaine	NRC
Ken Miller	NRC
Tyler Beck	NRC
Dave Wrona	NRC
Russ Wells	Tennessee Valley Authority (TVA)
Stuart Rymer	TVA
Jon Johnson	TVA
Dean Baker	TVA
Tony Williams	TVA
Carol Barajas	TVA
Beth Jenkins	TVA
Randy Staggs	TVA
Roam Bankes	TVA
David Berkenpas	TVA
Joan McCullum	TVA
Beau Eckermann	TVA

Enclosure

SUBJECT: SUMMARY OF APRIL 12, 2022, MEETING WITH TENNESSEE VALLEY
AUTHORITY REGARDING A PROPOSED EXEMPTION REQUEST FOR
WATTS BAR NUCLEAR PLANT, UNIT 2 (EPID L-2022-LRM-0032)
DATED APRIL 20, 2022

DISTRIBUTION:

PUBLIC	RidsNrrDorl Resource
PM File Copy	RidsNrrDrololb Resource
RidsACRS_MailCTR Resource	BGreen, NRR
RidsNrrDorlLpl2-2 Resource	JVazquez, NRR
RidsNrrPMWattsBar Resource	JRankin, NRR
RidsNrrLARButler Resource	CNolan, OEDO
RidsRgn2MailCenter Resource	LHowell, OEDO

ADAMS Accession No.: ML22104A225

OFFICE	DORL/LPL2-2/PM	DORL/LPL2-2/LA*	DORL/LPL2-2/BC*	DORL/LPL2-2/PM
NAME	KGreen	RButler	DWrona	KGreen
DATE	04/14/2022	04/19/2022	04/20/2022	04/20/2022

OFFICIAL RECORD COPY