

From: [Ramsey, Kevin](#)
To: [Munson, Jeremy](#); Andrew.Bixenman@urenc.com; [Diggs, Scott](#)
Cc: [Bartlett, Matt](#)
Subject: Final Summary of 10/29/2019 Call w/LES re: Exemption from 70.50(b)(2)
Date: Thursday, October 31, 2019 4:43:00 PM

On October 29, 2019, a call was conducted regarding the Louisiana Energy Services (LES) request for an exemption from the reporting requirement for disabled safety equipment in 10 CFR 70.50(b)(2). The following individuals participated:

- Kevin Ramsey, NRC/NMSS
- Jeremy Munson, NRC/NMSS
- Blake Bixenman, LES
- Scott Diggs, LES

NRC staff asked what LES intended when it submitted the application. LES staff stated the intent was to get an allowance to perform maintenance on the criticality accident alarm system (CAAS) without notifying NRC of a reportable event.

NRC staff noted that an exemption from the reporting requirement does not give relief from the CAAS requirements in 10 CFR 70.24. An exemption from the requirement to have an operational CAAS is the approach used in the past to allow maintenance activities. It was noted that if a CAAS is not required when it is disabled, it is not reportable under 10 CFR 70.50(b)(2).

LES staff stated that they would be willing to supplement the application to request an exemption from 10 CFR 70.24. NRC staff noted that the supplement should define a finite period of time for the exemption. Other licensees have specified 4 hours. A longer period of time would need to be justified.

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