



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

May 21, 2020
NOC-AE-20003736
File No.: G25
10 CFR 73.5
STI: 35020952

ATTN: Document Control Desk
Director, Office of Nuclear Reactor Regulation
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Exemption Request due to COVID-19 Pandemic

Reference: NRC Letter from H. Nieh and J. Lubinski to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for Part 73, Appendix B, Section VI During the Coronavirus Disease 2019 Public Health Emergency," April 20, 2020.
(ML20105A483)

As a result of the Coronavirus Disease 2019 (COVID-19) Public Health Emergency (PHE) STP Nuclear Operating Company (STPNOC) expects that it will no longer be able to comply with the requirements of the specific subsection(s) of 10 CFR Part 73, Appendix B, Section VI listed in the enclosures below and will implement site specific COVID-19 PHE training requalification controls consistent with those outlined in the Reference letter and its enclosures. These controls are documented in the enclosures.

STPNOC requests a temporary exemption from the identified security training requalification requirements listed in the enclosures. Granting of the requested exemption will allow deviation from the associated items in the South Texas Project Training and Qualification Plan. This temporary exemption supports the isolation restrictions (e.g., social distancing, group size limitations, self-quarantining, etc.) necessary to protect required site personnel in response to the 2020 COVID-19 PHE. These restrictions are needed to ensure personnel are isolated from the COVID-19 PHE and remain capable of maintaining plant security. STPNOC implemented isolation restrictions for site personnel on March 17, 2020.

This exemption is specific to security personnel who have previously demonstrated proficiency and are currently qualified in accordance with 10 CFR Part 73, Appendix B, Section VI, "Nuclear Power Reactor Training and Qualification Plan for Personnel Performing Security Program Duties."

Additionally, because of the rigorous nature of STPNOC nuclear security personnel training programs, which consist of regularly scheduled training activities to include weapons training,

contingency response drills and exercises, and demonstrated acceptable performance of day-to-day job activities (e.g., detection and assessment, patrols, searches, and defensive operations), it is reasonable to conclude that security personnel will continue to maintain their proficiency even though the requalification periodicity is temporarily exceeded.

The date and time STPNOC will begin implementing its site-specific COVID-19 PHE controls for managing personnel performing Security Program duties, is indicated in the enclosures.

The time period during which the exemptions are required is not currently known but will be in effect until 90 days after the PHE is ended or until December 31, 2020, whichever occurs first. Near the end of the exemption period, if more time is needed, an additional email supplement request may be submitted to extend the exemption period.

STPNOC is only requesting exemptions from the requirements in 10 CFR Part 73 Appendix B.

STPNOC requests a written confirmation of this request.

There are no commitments in this letter.

If you have any questions, please contact Walter Fulton at 361-972-4349 or me at 361-972-7697.



Aldo Capristo
Executive VP and Chief Administrative Officer

- Enclosure 1 - 10 CFR 73 Appendix B Section VI Subsection B.4.(a) Medical examinations and Subsection B.5.(a) Physical requirements
- Enclosure 2 - 10 CFR 73 Appendix B Section VI Subsection C.2.(a) and (b) 40 hours on-the-job training
- Enclosure 3 - 10 CFR 73 Appendix B Section VI Subsection C.3.(l)(1) Quarterly tactical response drills and annual force-on-force (FOF) exercises
- Enclosure 4 - 10 CFR 73 Appendix B Section VI Subsection D.2.(a) Annual requalification, Subsection E.1.(c) Annual firearms familiarization and Subsection F.5.(a) Annual weapons requalification
- Enclosure 5 - 10 CFR 73 Appendix B Section VI Subsection E.1.(f) Weapons range activities on a nominal 4-month periodicity

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cc:

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
1600 E. Lamar Boulevard
Arlington, TX 76011-4511

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Enclosure 1

**Enclosure 1 - 10 CFR 73 Appendix B Section VI Subsection B.4.(a) Medical examinations
and Subsection B.5.(a) Physical requirements.**

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection B.4.(a) Medical examinations</p> <p>and</p> <p>Subsection B.5.(a) Physical requirements</p>	<p>STP will maintain a list of the names of the individuals who will not meet the requalification requirements and will include the dates of the last qualification,</p> <p>and</p> <p>has established measures to ensure security personnel self-report any condition that could impact their ability to perform duties as a member of the security organization.</p>	<p>STP will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties upon NRC approval.</p>

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Enclosure 2

Enclosure 2 - 10 CFR 73 Appendix B Section VI Subsection C.2.(a) and (b) 40 hours on-the-job training

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection C.2.(a) and (b) 40 hours on-the-job training</p>	<p>STP will maintain a list of the names of the individuals who will not meet the requalification requirements and will include the dates of initial qualification.</p> <p>A needs analysis was conducted and determined that the individuals covered by the exemption have the requisite knowledge, skills and abilities to perform the duties assigned.</p> <p>This exemption only applies to individuals who have completed the qualification requirements in 10 CFR Part 73, Appendix B, Section VI, subsection C.1., "Duty training and qualification requirements," and have been previously qualified within STP security organization.</p> <p>Security management will continue to evaluate security personnel performance in the plant to identify and correct performance issues in a timely manner.</p>	<p>STP will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties upon NRC approval.</p>

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Enclosure 3

Enclosure 3 - 10 CFR 73 Appendix B Section VI Subsection C.3.(I)(1) Quarterly tactical response drills and annual force-on-force (FOF) exercises.

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection C.3.(l)(1) Quarterly tactical response drills and annual force-on-force (FOF) exercises</p>	<p>STP will maintain a list of the names of the individuals who will not meet the requalification requirements and will include the dates of the last qualification.</p> <p>and</p> <p>will ensure contingency response readiness of security personnel not participating in a quarterly drill or annual FOF exercise, or both, by conducting the following scenario-based evolution[s]:</p> <ul style="list-style-type: none"> a table-top exercise a lessons-learned review of past exercise <p>and</p> <p>will complete the FOF exercise, within the time period in this request, when isolation restrictions are ended.</p>	<p>STP will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties at 00:00 on 06/12/2020.</p>

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Enclosure 4

**Enclosure 4 - 10 CFR 73 Appendix B Section VI Subsection D.2.(a) Annual requalification,
Subsection E.1.(c) Annual firearms familiarization and Subsection F.5.(a) Annual
weapons requalification.**

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection D.2.(a) Annual requalification</p> <p>Subsection E.1.(c) Annual firearms familiarization</p> <p>Subsection F.5.(a) Annual weapons requalification</p>	<p>STP will maintain a list of the names of the individuals who will not meet requalification requirements and will include the dates of the last qualification for each of the requirements not completed.</p> <p>STP will conduct:</p> <p>discussions regarding critical tasks necessary for performance of security duties as assigned</p> <p>individual discussions regarding the fundamentals of marksmanship.</p>	<p>STP will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties at 00:00 on 09/02/2020.</p>

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Enclosure 5

Enclosure 5 - 10 CFR 73 Appendix B Section VI Subsection E.1.(f) Weapons range activities on a nominal 4-month periodicity.

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection E.1.(f) Weapons range activities on a nominal 4-month periodicity</p>	<p>STP will maintain a list of the names of the individuals who will not meet the requalification requirements and will include the dates of the last qualification.</p> <p>Since STP cannot complete the weapons range activities due to STP Pandemic response and CDC requirements that prohibit the ability to work within close range of the instructors and security force members on the range, discussions will be held with security personnel that will outline the objectives of the weapons range activity that will not be conducted due to COVID-19 PHE.</p>	<p>STP will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties at 00:00 on 07/20/2020.</p>