

From: Gaston, Ronald William <rgasto1@entergy.com>
Sent: Wednesday, May 27, 2020 2:34 PM
To: Guzman, Richard <Richard.Guzman@nrc.gov>
Cc: DocProcessing Center <DocProcessing.Center@nrc.gov>; Haagensen, Brian <Brian.Haagensen@nrc.gov>; Lew, David <David.Lew@nrc.gov>
Subject: [External_Sender] Entergy - Indian Point – Exemption from Annual force-on-force (FoF) Exercise

NL-20-044

Indian Point Nuclear Generating Unit Nos. 2 and 3
NRC Docket Nos. 50-247 and 50-286
Renewed Facility Operating License Nos. DPR-26 and DPR-64

NRR Project Manager – Indian Point
Mr. Richard Guzman

Reference: (1) NRC Letter from Mr. Ho Nieh and Mr. John Lubinski to Mr. Chris Bakken, "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," (ML20105A483), dated April 20, 2020

(2) Entergy Email to NRC, "Entergy - Indian Point – Exemption from Annual force-on-force (FoF) Exercise," (NL-20-39), (ML20125A327), dated April 29, 2020

Dear Mr. Guzman,

Based on discussions held on May 26, 2020, the exemption request in Reference 2 is resubmitted below in its entirety with the annotated clarifications.

In accordance with the Reference 1 letter, Entergy Nuclear Operations, Inc. on behalf of Indian Point Nuclear Generating Units Nos. 2 and 3 (Indian Point), requests an exemption from the requirement to conduct an annual force-on-force (FoF) exercise specified in 10 CFR 73, Appendix B, Section VI, subsection C.3.(l)(1). No exemption is requested for the quarterly tactical response drill required by this same subsection.

In support of this request Entergy provides the following information:

- Indian Point expects that it will no longer be able to comply with the requirements of subsection C.3.(l)(1) of 10 CFR Part 73, Appendix B, Section VI in regard to the annual force-on-force (FOF) exercise on June 30, 2020;
- Indian Point implemented its site-specific COVID-19 public health emergency (PHE) controls for managing personnel performing Security Program duties on March 15, 2020.
- Indian Point's site-specific COVID-19 PHE controls are consistent with the conditions outlined in Enclosure C to the referenced letter;

Enclosure C Additional Information

- Entergy will maintain a list of the names of the individuals who will not meet the requirements of 10 CFR Part 73, Appendix B, Section VI, subsection C.3.(I)(1) for the annual FoF exercise. The list will include the dates of the last quarterly drill and annual FoF exercise in which the individual participated.
- Entergy is taking measures to ensure contingency response readiness despite security personnel not participating in an annual FoF exercise. These measures include the continuing conduct of quarterly tactical response drills, which include one of the following:
 - a table top exercise
 - a communication-based exercise
 - a lessons-learned review of past exercise
 - a walkdown of previous exercise route of travel

Entergy will conduct any missed annual licensee-conducted FoF exercises within 90 days after the PHE ends or by December 31, 2020, whichever occurs first. ~~The missed exercises will be completed by December 31, 2020.~~

Duration of Exemption

Entergy requests that the exemption 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.

Entergy requests approval of this request by June 15, 2020.

Sincerely,
Ron Gaston
Director, Nuclear Licensing

cc: NRC Region I Regional Administrator – David Lew
NRC Senior Resident Inspector – Brian Haagensen
NRC Document Control Desk

Ron Gaston

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