

ENCLOSURE

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**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION RELATED TO EXEMPTION
REQUEST FROM CERTAIN EP REQUIREMENTS OF 10 CFR 50 APPENDIX E**

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In Reference 1, Entergy Operations, Inc. (Entergy) requested an exemptions from certain emergency preparedness and planning (EP) requirements of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR 50 for Arkansas Nuclear One, Units 1 and 2 (ANO-1 & 2). Specifically, Entergy requested a one-time exemption to postpone the current scheduled EP exercise until 2021.

The NRC staff has reviewed the submittal and determined that additional information is required to complete their review. Reference 2 transmitted the Request for Additional Information (RAI). The RAI requested a response within 30 days of the date of the request.

The subject RAI is repeated below followed immediately by Entergy's response.

RAI 1

Reference 3 in the licensee's exemption request, "U.S. Nuclear Regulatory Commission Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for All Licensees During the Coronavirus Disease 2019 Public Health Emergency," dated May 14, 2020 (ADAMS Accession No. ML2012A003), states in part,

To receive expedited review of an exemption request, a licensee should submit a request that contains the following information:

...

- A statement that the licensee has made a reasonable effort to reschedule the exercise during CY [Calendar Year] 2020, but was unsuccessful;

However, the exemption request does not indicate that a *reasonable effort was made to reschedule the exercise during CY 2020, but was unsuccessful.*

Please confirm and describe what reasonable effort the licensee made to reschedule the effort in CY 2020.

RESPONSE

Entergy has made a reasonable effort to reschedule the exercise at ANO during CY 2020, but has been unsuccessful. In March of 2019, ANO began the coordinated outreach concerning the preparations for the Ingestion Pathway Exercise (IPX) with both Federal Emergency Management Agency (FEMA) Region VI and the Arkansas Department of Health (ADH). Monthly planning meetings were held to allow for proper coordination and planning. These planning meetings led to a documented request (see the attached letter) from the ADH to request Entergy to seek an exemption from the NRC to defer the exercise. The ADH cites that even moving the exercise into the fall of 2020 beyond the scheduled dates of September 15

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and 16, 2020, raises other concerns, which are described in the attached letter. Based upon the ADH request, Entergy decided to request an exemption from the NRC to defer the exercise to CY 2021 which was preferred because it allows the ADH and the offsite response organizations to continue responding to the current global health crisis and focus on protecting responders as well as the health and safety of the public.

In light of the need to postpone or defer the exercise, ANO, in conjunction with FEMA, conducted ANO Ingestion Virtual Recovery Seminar hosted by Region 6 Technological Hazards Division Radiological Emergency Preparedness (THD/REP) Program and the ADH. The Virtual Seminar was held on July 14, 2020. This seminar allowed for continued training and coordination while preparing for execution of the IPX in 2021.

ATTACHMENT TO

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**LETTER FROM THE ARKANSAS DEPARTMENT OF HEALTH
TO ARKANSAS NUCLEAR ONE**

(1 Page)



Arkansas Department of Health

Governor Asa Hutchinson
Nathaniel Smith, MD, MPH, Director and State Health Officer

Chris Meyer, Section Chief, Nuclear Planning and Response Program
305 South Knoxville Avenue, Russellville, Arkansas 72801
(479) 968-7171

Josh Toben
Emergency Planning Manager
Arkansas Nuclear One

Josh,

Even with the worldwide COVID-19 pandemic, both the State of Arkansas and the counties around Arkansas Nuclear One continue to maintain the ability to protect the public health and safety. In an actual emergency, ad hoc procedures for staffing emergency facilities such as county EOCs, the State EOF, and other critical functions, would be accomplished either physically or virtually.

However, an exercise under the continuing uncertainty of the course of the COVID-19 pandemic, particularly moving into the fall, raises other concerns, among which are:

- Additional burden to the ADH Public Health Lab
- Additional burden to the Epidemiology Program
- Exposure risks inherent in co-locating at the SEOF
- Compromise of the ability to practice social distancing at county EOCs and in field team vehicles
- Additional burden on public health nurses from Local Health Units who assist at Reception Centers

Even though schools used for Reception Centers remain available for emergency use, it is unclear how efforts to mitigate virus spread in the fall as public schools reopen, might impact the availability of such facilities and staff for exercise purposes.

A wide array of options is being discussed with FEMA to develop alternate measures to demonstrate various evaluation criteria without compromising safety concerns. However, there comes a point where the benefits of extraordinary measures to complete an exercise may outweigh the benefits.

Arkansas has an almost forty-year history of successful demonstration of the ability to provide reasonable assurance of the ability to implement plans to protect the public in the event of an emergency at Arkansas Nuclear One.

As a result of these factors, it may be wise to postpone IPX '20 until a later time.

Sincerely,

J. Chris Meyer, Section Chief
Nuclear Planning and Response Program