

RS-20-086

September 24, 2020

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

Subject: Request for Exemption from the Biennial Emergency Preparedness Exercise Requirements in 10 CFR 50, Appendix E, IV.F.2.c

- References:
1. Letter from Ho Nieh (U.S. NRC) to Jennifer Uhle (NEI), Subject: Addendum to the U.S. Nuclear Regulatory Commission Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for Power Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency, dated September 2, 2020 (ADAMS Accession No. ML20223A152)
 2. NRC RIS-2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006 (ADAMS Accession No. ML053390039)

In accordance with 10 CFR 50.12, "Specific exemptions," Exelon Generation Company, LLC (EGC), the licensee for Quad Cities Nuclear Power Station (QCNPS), is requesting U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the requirements of 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV.F.2.c. Specifically, EGC requests a one-time relief for the evaluation of certain offsite elements of the station's biennial Radiological Emergency Preparedness (REP) exercise. This exemption is requested due to specific state and county offsite response organizations (OROs) being unable to complete required demonstration activities before December 31, 2020 as a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE). In order to allow continued focus on essential COVID-19 PHE response efforts the affected OROs wish to defer these activities to calendar year (CY) 2021.

On March 9, 2020, the Governor of the State of Iowa issued the first Proclamation of Disaster Emergency activating the disaster response and recovery aspects of the Iowa Emergency Response Plan and those additional response plans applicable to all of Iowa's 99 counties, including Clinton and Scott counties, which support QCNPS. Due to the magnitude of the

disaster response and impact on resources, on July 10, 2020 the Iowa Department of Homeland Security and Emergency Management (HSEMD) requested that Federal Emergency Management Agency (FEMA) Region VII provide relief to both the state and counties from participation in any REP activities for the remainder of CY 2020 due to COVID-19 (Attachment 2a). Region VII recommended FEMA Headquarters approve of the Iowa HSEMD request for relief from 44 CFR Part 350.9(c), "Exercises" on August 25, 2020 (Attachment 2b). On September 14, 2020 Region VII approved a one-time exemption to 44 CFR Part 350.9(c) allowing the OROs to defer the QCNPS biennial REP, and associated out of sequence evaluations, until no later than November 2021 (Attachment 2c).

As a result of the State of Iowa and both Clinton and Scott County OROs being unable to participate in the QCNPS biennial REP conducted on August 11, 2020 or otherwise complete required out of sequence evaluations before the end of CY 2020, Exelon requests an exemption from 10 CFR 50, Appendix E, Section IV.F.2.c to allow postponement of the remaining ORO evaluations to be completed no later than November 30, 2021.

Attachment 1 to this letter provides the detailed basis and justification for this exemption request and addresses the exemption requirements of 10 CFR 50.12 and the guidance criteria contained in References 1 and 2. Attachment 2 contains copies of the correspondence between the Iowa HSEMD and FEMA concerning the state and counties inability to support the August 11, 2020, QCNPS biennial EP exercise and the approved exemption from 44 CFR 350.9(c).

EGC requests approval of this exemption by December 31, 2020, based on the requirements for biennial EP exercise participation expiring at the end of 2020. This exemption request contains no new regulatory commitments.

If you have any questions or require additional information, please contact Ms. Rebecca Steinman at 630-657-2831.

Respectfully,



Patrick R. Simpson
Sr. Manager – Licensing
Exelon Generation Company, LLC

Attachments: 1. Request for Exemption Related to 10 CFR 50, Appendix E, Section IV.F.2.c
2. Supporting correspondence between the Iowa Department of Homeland Security and Emergency Management Agency and the Federal Emergency Management Agency

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector- Quad Cities Nuclear Power Station
NRC Project Manager, NRR - Quad Cities Nuclear Power Station

ATTACHMENT 1

Quad Cities Nuclear Power Station, Units 1 and 2
Docket Nos. 50-254 and 50-265

Request for Exemption
Related to 10 CFR 50, Appendix E, Section IV.F.2.c

EXEMPTION REQUEST

I. SPECIFIC EXEMPTION REQUEST

In accordance with 10 CFR 50.12, "Specific exemptions," paragraphs (a)(1) and (a)(2)(v), Exelon Generation Company (EGC), LLC is requesting U.S. Nuclear Regulatory Commission (NRC) approval of a one-time exemption from the requirements of 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV.F.2.c. Specifically, EGC is requesting a one-time exemption to certain offsite functions of the Quad Cities Nuclear Power Station (QCNPS) Radiological Emergency Preparedness (REP) biennial exercise that would have normally been performed as part of the exercise conducted on August 11, 2020. This exemption is requested due to specific state and county offsite response organizations (OROs) being unable to complete required demonstration activities before December 31, 2020 as a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE). If the exemption is granted, the remaining ORO activities will be completed no later than November 30, 2021.

10 CFR 50, Appendix E, Section IV.F.2.c stipulates the following:

2. The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public alert and notification system, and ensure that emergency organization personnel are familiar with their duties.

...

c. Offsite plans for each site shall be exercised biennially with full participation by each offsite authority having a role under the radiological response plan. Where the offsite authority has a role under a radiological response plan for more than one site, it shall fully participate in one exercise every two years and shall, at least, partially participate in other offsite plan exercises in this period.

The U.S. Department of Health and Human Services declared a PHE for the United States to aid the nation's healthcare community in responding to COVID-19. On March 9, 2020, the Governor of the State of Iowa issued the first Proclamation of Disaster Emergency activating the disaster response and recovery aspects of the Iowa Emergency Response Plan and those additional response plans applicable to all of Iowa's 99 counties, including Clinton and Scott counties, which support QCNPS. The COVID-19 outbreak was characterized as a pandemic by the World Health Organization on March 11, 2020.

Due to the magnitude of the COVID-19 disaster response and impact on resources, on July 10, 2020 the Iowa Department of Homeland Security and Emergency Response (HSEMD) requested that Federal Emergency Management Agency (FEMA) Region VII provide relief to both the state and counties from participation in any REP activities for the remainder of CY 2020. The basis provided for this request included, in part, the increasing trend in the number of COVID-19 cases in Iowa coupled with the resource impacts from the ongoing PHE response.

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QCNPS was concurrently notified that state and county personnel from Iowa would be unable to participate in the August 11, 2020 Quad Cities REP exercise. A similar notification was received from the Illinois Emergency Management Agency (IEMA) regarding the State of Illinois and Rock Island and Whiteside County organizations inability to support the QCNPS biennial REP exercise.

The HSEMD and IEMA cancellation of the Iowa and Illinois state and county offsite organization participation in the biennial REP exercise on August 11, 2020, resulted in certain offsite response organization (ORO) functions not being demonstrated during the exercise. The Illinois OROs have completed demonstration of the outstanding objectives, but the Iowa OROs will defer the outstanding objectives into CY 2021 with a commitment to complete outstanding 2020 demonstrations no later than November 30, 2021. As a result, QCNPS does not meet the 10 CFR 50, Appendix E, Section IV.F.2.c requirement to exercise offsite plans with full participation by each offsite authority having a role under the emergency plan. This request for one-time exemption is consistent with the guidance specified in Regulatory Issue Summary (RIS) 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006 for circumstances that make it impractical to conduct the scheduled exercise with all required offsite authorities (ML053390039) as well as the September 2, 2020 addendum to the U.S. NRC Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for Power Reactor Licensees during the COVID-19 Public Health Emergency (ML20223A152).

II. BASIS FOR EXEMPTION REQUEST

The criteria for granting specific exemptions from 10 CFR 50 regulations are stated in 10 CFR 50.12. In accordance with 10 CFR 50.12(a)(1), the NRC is authorized to grant an exemption upon determining that the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security.

Furthermore, as stated in 10 CFR 50.12 (a)(2), special circumstances must exist for the NRC to consider granting an exemption. According to 10 CFR 50.12(a)(2)(iv), special circumstances are present whenever the exemption would result in benefit to the public health and safety that compensates for any decrease in safety that may result from the granting of the exemption.

Special Circumstances

The COVID-19 PHE created special circumstances (increase in number of COVID-19 cases coupled with overall PHE resource impacts) that precluded QCNPS from having full participation during their biennial exercise. Specifically, QCNPS conducted the exercise on August 11, 2020 without Iowa or Illinois state or county offsite response organization (ORO) participation. QCNPS decided to conduct the exercise without all required offsite authorities based on the July 10, 2020 HSEMD letter requesting FEMA relief from all exercises in 2020. Illinois state and county OROs received objective credit from FEMA Region V for COVID-19 and civil unrest related activities for most of the required demonstration functions and demonstrated the remaining functions on September 22, 2020. Iowa requested similar objective credit from FEMA Region VII (See Attachment 2) and made commitments regarding

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maintenance of their emergency plans and ability to respond to an actual radiological event but requested deferral of additional required demonstrations until 2021. As a result of this ORO decision, an exemption to Section IV.F.2.c is required for the Iowa state and county OROs. The list and table below summarize the Iowa ORO participants and functions requested to be deferred and completed no later than November 30, 2021.

Facilities Unable to Participate in the 2020 QCNPS REP Exercise

- HSEMD
- Clinton County
- Scott County

List of Iowa ORO Functions to be Deferred to 2021

| ID | EP Function | HSEMD | Clinton County | Scott County |
|-----------|--|--------------|-----------------------|---------------------|
| 1.a.1 | Notification and Mobilization | X | X | X |
| 1.b.1 | Facilities | | | |
| 1.c.1 | Direction and Control | X | X | X |
| 1.d.1 | Communications Equipment | X | X | X |
| 1.e.1 | Equipment and Supplies | X | X | X |
| 2.a.1 | Emergency Worker Exposure Control | | X | X |
| 2.b.1 | Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency | X | X | X |
| 2.b.2 | Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency | X | X | X |
| 2.c.1 | Protective Action Decision Consideration for the Protection of Persons with Disabilities and Access/Functional Needs | | X | X |
| 3.a.1 | Implementation of Emergency Worker Exposure Control | X | X | X |
| 3.b.1 | Implementation of KI Decision for Institutionalized and the General Public | | X | X |
| 3.c.1 | Implementation of Protective Actions for Persons with Disabilities and Access/Functional Needs | | X | X |
| 3.c.2 | Implementation of Protective Actions for Schools | | X | X |

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| ID | EP Function | HSEMD | Clinton County | Scott County |
|-------|--|-------|----------------|--------------|
| 3.d.1 | Implementation of Traffic and Access Control | X | X | X |
| 3.d.2 | Implementation of Traffic and Access Control – Impediments to Evacuation | X | X | X |
| 5.a.1 | Activation of the Prompt Alert and Notification System | | X | X |
| 5.b.1 | Subsequent Emergency Information and Instructions for the Public and the Media | | X | X |
| 6.a.1 | Monitoring, Decontamination and Registration of Evacuees | | | |
| 6.b.1 | Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles | | | |
| 6.c.1 | Temporary Care of Evacuees | | | |
| 6.d.1 | Transportation and Treatment of Contaminated Injured Individuals | | | |

Justification for the Exemption

In accordance with 10 CFR 50.12(a)(1), the NRC may grant exemptions from certain requirements of the 10 CFR 50 regulations that are authorized by law, will not present undue risk to the public health and safety, and are consistent with the common defense and security.

1. This exemption request is authorized by law:

In accordance with 10 CFR 50.12, the NRC may grant an exemption from the requirements of 10 CFR 50 if the exemption is authorized by law. The proposed exemption is authorized by law in that no other prohibition of law exists to preclude the activities which would be authorized by the exemption. The underlying purpose for conducting a biennial exercise is to test the adequacy of emergency plans, to ensure that emergency response organization personnel are familiar with their duties, and to identify and correct weaknesses. The activities performed during the last QCNPS biennial exercise in 2018, along with out-of-sequence drills and training demonstrate that the underlying purpose of conducting an exercise with participation from state and county authorities has been maintained. Therefore, the proposed exemption will continue to serve the underlying purpose of the regulation.

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2. This exemption request will not present an undue risk to the public health and safety:

Adequate emergency response capabilities have been maintained and demonstrated including satisfactory performance during the last QCNPS biennial exercise on December 4, 2018 and through the conduct of out-of-sequence training and activities. Since the last biennial exercise in 2018, QCNPS has conducted a number of training drills, exercises, and demonstrations that have involved actual and/or simulated interface with the state and county authorities. While these drills and training sessions did not exercise all of the proposed rescheduled offsite functions, they do provide indication that QCNPS has maintained a continuing level of engagement with the state and county authorities to maintain interfaces.

December 4, 2018 QCNPS Exercise

The FEMA Region VII evaluation of the December 4, 2018 exercise concluded that, "the offsite radiological emergency response plans and preparedness for the State of Iowa and affected local jurisdictions are deemed adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public in the event of the radiological emergency." There were no Level 1 or Level 2 issues identified during this exercise for the State of Iowa, Clinton or Scott County.

State of Iowa Extent of Play and Results

2018 QCNPS Exercise Participant and Functions

| ID | EP Function | State of Iowa | Clinton County | Scott County |
|-----------|--|----------------------|-----------------------|---------------------|
| 1.a.1 | Notification and Mobilization | M | M | M |
| 1.b.1 | Facilities | | | |
| 1.c.1 | Direction and Control | M | M | M |
| 1.d.1 | Communications Equipment | M | M | M |
| 1.e.1 | Equipment and Supplies | M | M | M |
| 2.a.1 | Emergency Worker Exposure Control | M | M | M |
| 2.b.1 | Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency | M | M | M |
| 2.b.2 | Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency | M | M | M |
| 2.c.1 | Protective Action Decision Consideration for the Protection of Persons with Disabilities and Access/Functional Needs | | M | M |

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2018 QCNPS Exercise Participant and Functions

| ID | EP Function | State of Iowa | Clinton County | Scott County |
|---|--|----------------------|-----------------------|---------------------|
| 3.a.1 | Implementation of Emergency Worker Exposure Control | M | M | M |
| 3.b.1 | Implementation of KI Decision for Institutionalized and the General Public | | M | M |
| 3.c.1 | Implementation of Protective Actions for Persons with Disabilities and Access/Functional Needs | | | |
| 3.c.2 | Implementation of Protective Actions for Schools | | M | M |
| 3.d.1 | Implementation of Traffic and Access Control | M | M | M |
| 3.d.2 | Implementation of Traffic and Access Control – Impediments to Evacuation | M | M | M |
| 5.a.1 | Activation of the Prompt Alert and Notification System | | M | M |
| 5.b.1 | Subsequent Emergency Information and Instructions for the Public and the Media | | M | M |
| 6.a.1 | Monitoring, Decontamination and Registration of Evacuees | | | M |
| 6.b.1 | Monitoring and Decontamination of Emergency Workers and their Equipment and Vehicles | | | M |
| 6.c.1 | Temporary Care of Evacuees | | | M |
| 6.d.1 | Transportation and Treatment of Contaminated Injured Individuals | | | M |
| key: M= met criteria, blank = not evaluated during this exercise | | | | |

Since the 2018 exercise, the following out of sequence FEMA evaluations for QCNPS involving Clinton and Scott Counties took place.

| Date | Out of Sequence | FEMA Evaluated function | Location |
|-------------|------------------------|--------------------------------|---------------------------------|
| 10/8/19 | | Medical Services Drill | Genesis Medical Center - DeWitt |

Exercises/Drills 2018-2020

In addition to the evaluations described above, the table below lists the drills that have been performed since the December 4, 2018 QCNPS Exercise. Not all of the drills listed below have exercised the functions proposed for deferral; however, the list is provided to show the

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continuing level of engagement in EP activities for QCNPS and the actual and/or simulated participation with the State of Iowa, Clinton and Scott Counties.

| Date | Drills/Exercises |
|------------|---|
| 02/13/2019 | Simulator/Technical Support Center (TSC)/ Operation Support Center (OSC) Focus Area Drill (FAD) |
| 05/21/2019 | Off-Year Exercise |
| 06/12/2019 | TSC/ OSC FAD |
| 06/28/2019 | Health Physics Drill |
| 07/09/2019 | Health Physics/ Medical Emergency Drill |
| 08/21/2019 | Environmental Drill |
| 10/10/2019 | OSC/TSC/Simulator FAD |
| 11/22/2019 | TSC Tabletop exercise |
| 02/18/2020 | OSC/ TSC FAD |
| 06/12/2020 | Health Physics Drill |
| 07/07/2020 | QCNPS Pre-Exercise |

Training

In addition to exercises/drills performed since the last biennial exercise at QCNPS, the following training has been accomplished with the State of Iowa, Clinton and Scott Counties, and supporting organizations.

| Date | Activity | Group |
|---------|---|---|
| 1/15/19 | Emergency Worker, EOC Operations, Traffic and Access Control | Clinton County Sheriff's Office |
| 2/6/19 | Emergency Worker, Bus Driver Training | Camanche School District, Clinton School District |
| 2/13/19 | Emergency Worker, Radiation Medical | Camanche Fire Department |
| 2/26/19 | Emergency Worker, Radiation Monitoring & Decon | Clinton Fire Department |
| 4/17/19 | Emergency Worker, Traffic and Access Control, Bus Driver Training | Clinton Municipal Transit |
| 6/10/19 | EOC Operations, Traffic and Access Control, EAS | Clinton County Emergency Management Agency |
| 6/10/19 | Emergency Worker, Radiation Monitoring & Decon | Clinton County EMA, Low Moor Fire Dept., Charlotte Fire Dept., Goose Lake Fire Dept., Preston Fire Dept., Delmar Fire Dept., Andover Fire Dept., Gateway Area Chapter-ARC, Northeast Community School |
| 8/6/19 | Emergency Worker, Radiation Medical | MEDIC Ambulance Service |

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| Date | Activity | Group |
|----------|--|---|
| 8/6/19 | Emergency Worker, EOC Operations, Traffic and Access Control, Rad Monitor & Decon, Bus Driver Training | Eldridge Fire Dept., Davenport Fire Dept., Donahue Fire Dept., Long Grove Fire Dept., American Red Cross, Salvation Army, Eldridge Police Dept., N. Scott Comm. School Dist. |
| 9/25/19 | Emergency Worker, Radiation Monitoring & Decon | Genesis Medical Center – Davenport |
| 10/7/19 | Emergency Worker, Radiation Monitoring & Decon | Genesis Medical Center – DeWitt |
| 10/10/19 | Emergency Worker, EOC Operations, Traffic and Access Control, EAS | Scott County Administrator, Scott County Emergency Management Agency, Scott County Communications, Scott County Health Dept., Scott County Engineer, Scott County Schools, Scott County PIO |
| 11/20/19 | EAS Training | National Weather Service - Davenport |

3. This exemption request is consistent with the common defense and security:

This exemption requests NRC approval to defer certain offsite functions for the State of Iowa and Clinton and Scott County offsite response organizations (OROs) to be deferred into CY 2021 and completed no later than November 30, 2021. This deferral request is the result of the COVID-19 national PHE and the specific circumstances impacting the State of Iowa since March 9, 2020, which directly impacted the ability of Iowa OROs to participate in the QCNPS exercise held on August 11, 2020. The proposed deferral aligns with the September 2, 2020 NRC position to consider, on an expedited basis, requests for exemption from the 10 CFR 50, Appendix E, Section IV.F.2.c requirement for offsite biennial exercises due in CY 2020, with the next performance of the exercise to be completed no later than the end of CY 2022.

Pursuant to 10 CFR 50.12(a)(2), the NRC will consider granting an exemption from the requirements when special circumstances are present. This exemption request meets this requirement since special circumstances involving the state's response to the COVID-19 public health emergency are present.

Additionally, the exemption would provide only one-time relief from the 10 CFR 50, Appendix E, Section IV.F.2.c requirements. Specifically, the exempted offsite functions for the Iowa and associated county OROs will be next evaluated no later than November 30, 2021.

Therefore, the common defense and security are not affected by this exemption request.

III. ENVIRONMENTAL ASSESSMENT

EGC has determined that the requested exemption meets the categorical exclusion in 10 CFR 51.22(c)(25), as the requested licensing action is an exemption from the requirements of the Commission's regulations and (i) there is no significant hazards consideration; (ii) there is no significant changes in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) there is no significant increase in individual or cumulative public or occupational radiation exposure; (iv) there is no significant construction impact; and (v) there is no significant increase in the potential for or consequences from radiological accidents. Therefore, in accordance with 10 CFR 51.22(b), no environmental assessment or environmental impact statement needs to be prepared in connection with the proposed exemption request.

If the requested exemption is approved by the NRC, certain offsite functions for the State of Iowa and related counties not conducted on August 11, 2020 will be deferred to CY 2021 and completed no later than November 30, 2021. The specific date of conduct of these functions would not have an effect on the environment since any outdoor activity during an exercise is limited to minimal use of roads and highways. The proposed action would not significantly increase the probability or consequences of an accident, change the types or quantities of radiological effluents that may be released offsite, or result in a significant increase in public or occupational radiation exposure since there would be no change to facility operations that could create a new accident or affect a previously analyzed accident or release path.

Since the proposed action would not have any adverse environmental effects, there are no alternatives necessary for reducing or avoiding adverse environmental effects. With regard to non-radiological impacts, no changes would be made to non-radiological plant effluents or activities that would adversely affect the environment. Therefore, no significant non-radiological impacts would be associated with the proposed action.

There are no federal permits, licenses, approvals or other entitlements which must be obtained in connection with the proposed action. The proposed action is not subject to any environmental quality standards or requirements imposed by federal, state, regional or local agencies having responsibility for environmental protection.

IV. CONCLUSION

As demonstrated above, EGC considers that this one-time exemption request from the requirements of Section IV.F.2.c of Appendix E to 10 CFR 50 to defer specific offsite function demonstrations to be completed no later than November 30, 2021, is in accordance with the criteria of 10 CFR 50.12. Specifically, this requested exemption is authorized by law, will not present an undue risk to the public health and safety and is consistent with the common defense and security. Also, special circumstances are present as set forth in 10 CFR 50.12(a)(2).

ATTACHMENT 2

Quad Cities Nuclear Power Station, Units 1 and 2
Docket Nos. 50-254 and 50-265

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Related to 10 CFR 50, Appendix E, Section IV.F.2.c

Supporting Correspondence Between the Iowa Department of Homeland Security and
Emergency Management and the Federal Emergency Management Agency

- a. July 10, 2020 Letter from Iowa HSEMD to FEMA
- b. August 25, 2020 FEMA Memo between Region VII and HQ (w/ enclosure)
- c. September 14, 2020 letter from FEMA to Iowa HSEMD (w/o enclosure)



STATE OF IOWA

KIM REYNOLDS
GOVERNOR

ADAM GREGG
LT. GOVERNOR

IOWA DEPARTMENT OF HOMELAND SECURITY
AND EMERGENCY MANAGEMENT
V. JOYCE FLINN, HOMELAND SECURITY ADVISOR
AND EMERGENCY MANAGEMENT DIRECTOR

July 10, 2020

Mr. Paul Taylor
Regional Administrator
DHS-FEMA Region VII
11224 Holmes Road
Kansas City, MO 64131

Dear Mr. Taylor,

Iowa is requesting relief from the FEMA Radiological Emergency Preparedness (REP) biennial exercise frequency requirements for the Duane Arnold Energy Center (DAEC) and the Quad Cities Generating Station (QCGS) due to hardship caused by the response efforts to the COVID-19 pandemic. As a result of the ongoing response to the COVID-19 pandemic, the emergency preparedness off-site response organizations (ORO's) that support DAEC including, Benton, Buchanan, Johnson, Linn, Marshall, and Scott counties, and the those that support QCGS including Clinton and Scott counties, as well as the State of Iowa have been greatly impacted. The previous QCGS REP evaluated exercise was held on December 4, 2018, and the next exercise is scheduled for August 11, 2020. The previous DAEC REP evaluated exercise was held on May 15, 2018, and the next exercise is scheduled for September 2, 2020.

The response to the COVID-19 pandemic has been unprecedented. On March 9, 2020 Governor Kim Reynolds issued the first Proclamation of Disaster Emergency activating the disaster response and recovery aspects of the Iowa Department of Homeland Security and Emergency Management's Iowa Emergency Response Plan and those additional response plans applicable to all of Iowa's 99 counties. The Proclamation authorized the use and deployment of all available resources, supplies, equipment, and material as are reasonably necessary to assist the citizens of Iowa. Since the COVID-19 pandemic was first detected, over 32,800 Iowans have tested positive, and there have been 739 deaths. Iowa has implemented a very aggressive testing program with over 350,000 Iowans tested for COVID-19.

The Iowa State Emergency Operations Center (SEOC) and the County Emergency Operations Centers have been activated responding to the pandemic for over four months. First responders, health care workers, state and county officials, and volunteers, and have been taking actions to protect the health and safety of Iowans by taking the following measures:

- Implementing COVID-19 testing and contact tracing
- Providing personal protective equipment (PPE) to local and state jurisdictions. Currently there have been over 1500 missions for distribution of PPE
- Setting limitations on public gatherings
- Implementing social distancing policies

- School closures
- Non-essential business closures

Implementing these measures has been demanding on the ORO's. All organizations have been working tremendous hours coordinating emergency response measures. Specifically, first responders and hospital staff have been doing an extraordinary job in providing health care services to their communities. Although these individuals are unwavering in protecting the citizens of their communities, there is a systemic fatigue present among the ORO's. Given the potential of ongoing impacts from the COVID-19 pandemic, coupled with the current increase in the number of cases which poses a significant risk for community spread of COVID-19, I believe conducting full-scale exercises for DAEC and QCGS during this pandemic would not only add a burden to the over-taxed ORO's, but could put exercise participants at risk of contracting COVID-19.

Iowa has also seen civil unrest across the state to include violent protests, vandalism, and violence towards law enforcement. Two individuals were fatally shot, and a police officer was wounded as shooting and property destruction occurred in Scott County. These incidents have been another operational impact to the emergency responders.

To further aid you in making a determination on our request for relief from exercise demonstration, I want to highlight the continuous success and achievements of the Iowa REP program. I believe these measures will provide FEMA reasonable assurance that Iowa can protect the public health and safety if a radiological emergency were to occur at the DAEC or QCGS nuclear power plants.

1. The success and high standards of the Iowa REP Program have been demonstrated to FEMA during recent evaluated exercises. FEMA has determined no deficiencies have been identified that would impact the capability to protect the health and safety of citizens that live within the emergency planning zones of the DAEC or QCGS nuclear power plants. Iowa is recognized as a leader within the REP community, demonstrating innovative practices and successful operation of the program through frequent presentations at various professional organizations, i.e. National Radiological Emergency Preparedness Conference, the Conference of Radiation Control Program Directors, and the Health Physics Society. Iowa continues to have a high level of radiological emergency preparedness. The Iowa REP program has a depth of knowledge with an experienced offsite response organizations. Many individuals have over 25 years of involvement and expertise in radiological emergency preparedness at both the county and state level.
2. Iowa has developed and implemented an Enhanced Exercise Initiative (EEI) to improve collaboration between offsite response organizations and FEMA. The EEI is a collaborative departure from the traditional FEMA-only evaluation of REP exercises and places a greater emphasis on the ORO to self-identify, document and openly critique their own performance; as well as provide FEMA opportunities to shed light on the all hazards, whole government concepts the REP program provides. The EEI seeks to transform the exercise component of the REP program into one of greater federal, state, local, tribal, and private sector partnership and to foster continuous improvement for the betterment of the REP program as a whole. Iowa has conducted several exercises using the EEI successfully at both QCGS and DAEC.

3. Iowa has a Type-1 Radiological Operations Support Specialist (ROSS). The ROSS program is a means for local health physicists and other personnel with radiological knowledge to support radiological response operations in an emergency. The ROSS can assist response organizations in interpretation and application of data products, provide just in time training to responders, provide tools and resources to facilitate response activities, and put radiological risks in perspective for an incident. The Iowa ROSS representative has provided support and training to several states (most recently Arizona and Michigan) during drills for nuclear detonation response and RadResponder implementation. The Iowa ROSS representative continually coordinates with the ROSS and dose assessment community to develop new training opportunities. The ROSS representative then shared those developed resources with Iowa's dose assessment team to support and implement best practices for Iowa REP's protective action recommendation and protective action decision planning.

4. Recently my office completed a capability assessment of the ORO's for the State of Iowa, DAEC, and the QCGS. This assessment provided assurance to FEMA that during the current COVID-19 pandemic, the State of Iowa continues to have the ability to competently operate response facilities, communications systems, and alert and notification systems. Currently Iowa has in place the following compensatory actions related to the Iowa REP Program for response to a nuclear power plant incident while community mitigation and social distancing measures are required:
 - Shelter in Place as the most effective public protective action to a release exceeding EPA Protective Action Guidelines.
 - Hospitals and nursing homes should be directed to preferentially shelter in place as the preferred protective action. Evacuation of critical populations in hospitals and nursing home should not be considered for doses less than 50 rem or implemented until projected dose exceeds 100 rem.
 - In the event of a radiological release, the Emergency Response Joint Information Center should clearly articulate the difference between shelter in place and stay at home or shelter in place orders issued for COVID-19 pandemic mitigation.
 - The Iowa radiological response organization will maximize remote capabilities to reduce the risk for transmission of COVID-19 and the subsequent impact to radiological assessment capabilities with the following compensatory actions:
 - Only the Iowa Department of Public Health (IDPH) Dose Assessment Lead and IDPH Plant Liaison/ERDS will report to the SEOC
 - Offsite Dose Assessment will be conducted remotely
 - Field Teams will deploy with one member when possible and will employ source control equipment practices when multiple team members are necessary
 - Field Monitoring Team Coordinators response will be conducted remotely

5. Every year my office submits to FEMA an Annual Letter of Certification, which outlines actions and provides concurrence that all requisite activities have been undertaken or completed, as appropriate, by the Iowa ORO's. Iowa certifies and documents that all items listed below are accomplished:

- Certification of 24-hour staffing
 - Public Education and Information
 - Emergency Facilities and Equipment
 - Exercises to test all major elements conducted
 - Drills conducted
 - Radiological Emergency Response Training conducted
 - Plan, procedures, and letters of agreements are current and have been reviewed with appropriate changes made
 - Alert and Notification testing and capability
6. In the first few months of 2020, and prior to COVID-19 Impacting Iowa, several REP preparedness events were conducted, including:
- An Ingestion Pathway Workshop provided training to radiological monitoring and sampling teams. FEMA representatives attended this workshop and provided staff assistance in the delivery of this training.
 - In preparation for the DAEC 2020 exercise, Iowa fully participated in the March 4, 2020 dress rehearsal exercise. FEMA representatives did observe at this exercise in Linn County, Benton County, Iowa Radiological Field Team Coordination, Iowa Radiological Field Teams, as well as the 211 Call Center. The feedback from FEMA included comments such as "Excellent Leadership", "Command and Control was concise, effective and EOC briefings were thorough", "Excellent demonstration by the Field Team Coordinator", "Kudos for making sure the field teams always had an exit route", "Outstanding job by United Way of Central Iowa demonstrating rumor control and handling of calls to 211". "The staff was very engaged throughout, with call center supervisor directly engaged." FEMA also provided suggestions for improvement.
 - Linn and Benton Counties updated the DAEC off-site transportation plan.
 - Linn and Benton Counties conducted annual training for their emergency operations center responders.
 - Linn and Benton Counties updated their Emergency Alert System message database.
 - Annual training was conducted for the Iowa City Fire Department.
 - The State of Iowa conducted annual training for SEOC responders.
 - Emergency response training was provided to Scott County transportation providers.
 - Monthly communications/notification tests were conducted with both DAEC and QCGS.
 - Monthly REP coordination meetings were conducted in support of DAEC with utility, state and local officials.
 - Quarterly REP coordination meetings were conducted in support of QCGS with utility, state and local officials.
7. Iowa can validate for FEMA how several of the exercise criteria that are typically demonstrated during a REP exercise at both the state and county level were implemented during the COVID-19 pandemic and civil unrest response. If needed, my staff can provide detailed documentation that these real world events can meet REP evaluation criteria to include:

- Mobilization of emergency response personnel and activation of facilities
- Direction and control by key personnel and leadership
- Emergency response coordination between state and local jurisdictions
- Communications systems were established, maintained, and operable
- Traffic Control and directional changes
- Protective actions for persons with access/function needs, specifically schools and daycare centers
- Emergency information and instructions for the public and news media
- Notification to the public for emergency protective measures
- Transportation of patients
- Long term housing, sheltering, feeding and medical screening of patients

My office has coordinated with the Benton, Clinton, Linn, and Scott County emergency management officials, the Iowa Department of Public Health, the Iowa State Hygienic Laboratory, as well as the NextEra Energy and Exelon Generation in providing this information to request relief from demonstrating the DAEC and QCGS 2020 REP exercises.

Thank you for your consideration of this request. If you, or your staff, require additional information to assist you in making your decision to grant Iowa relief from conducting the 2020 biennial REP exercises with DAEC and QCGS, please do not hesitate to contact me, or Jeremy Sroka, the Iowa REP Program Manager, at 515-323-4324 or at jeremy.sroka@iowa.gov.

Sincerely,



V. Joyce Flinn
Director



FEMA

August 25, 2020

MEMORANDUM FOR: Michael S. Casey, PhD, Director, Technological Hazards Division
National Preparedness Directorate
U.S. Department of Homeland Security-FEMA

FROM: Thomas Morgan, Chief, Technological Hazards Branch/RAC Chair
National Preparedness Division, FEMA Region VII THOMAS J
MORGAN

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MORGAN
Date: 2020.08.25 09:16:16 -05'00'

SUBJECT: Request for Relief from the Frequency Requirements for Quad Cities
Generating Station Biennial Radiological Emergency Preparedness
Program (REPP) Exercise

Pursuant to 44 CFR Part 350.9(c), "Exercises," FEMA Region VII received a request for approval for relief from the frequency requirement to conduct the Quad Cities Generating Station biennial radiological emergency preparedness exercise scheduled for August 11, 2020, from the Iowa Department of Homeland Security and Emergency Management. The relief is specifically being requested to address the concerns posed by the conduct of a biennial radiological emergency preparedness exercise while offsite response organizations (OROs) are actively responding to the ongoing public health emergency. Note that although the relief request received from the state included the biennial exercises for both Duane Arnold Energy Center and Quad Cities Generating Station, Region VII is evaluating and processing each separately.

Attachment 1 provides supporting documentation and justification for the relief request. The relief request addresses the frequency requirements of 44 CFR 350.9(c) and adheres to guidance set forth in the "Framework for Processing Relief from the Frequency Requirements for Radiological Emergency Preparedness Program (REPP) Exercises".

This request was reviewed by FEMA Region VII REPP staff. The Regional Administrator recommends that this request for relief be approved for the Quad Cities Generating Station biennial exercise and associated out of sequence evaluations. If you have any further questions, please contact the Region VII Regional Assistance Committee Chairperson Thomas Morgan at Thomas.Morgan5@fema.dhs.gov or (816) 808-2756.

FEMA Region VII

Attachment 1

Justification for Relief Request

Reference: Letter from V. Joyce Flinn, Director, Iowa Department of Homeland Security and Emergency Management to Paul Taylor, Regional Administrator, FEMA Region VII dated July 10, 2020 (attached).

As noted in the attached letter, the State of Iowa and Offsite Response Organizations that support offsite emergency preparedness and response for Quad Cities Generating Station (QCGS) have been activated and responding to the COVID-19 public health emergency since March 9, 2020, when the governor issued a statewide emergency declaration. The number of positive cases and other indicators continue to fluctuate throughout the state, indicating a continued significant risk for community spread for an undetermined period. Conducting a full-scale exercise in this environment would not only add a burden to the already fatigued OROs but would put both exercise participants and FEMA evaluation staff at higher risk of contracting COVID-19.

The affected site and OROs are the Quad Cities Generating Station, the State of Iowa, and Clinton and Scott counties in Iowa. The last evaluated biennial exercise was conducted on December 4, 2018 with no findings or issues noted. A Medical Services Drill was conducted with Genesis Medical Center on October 8, 2019 with no findings or issues noted.

The current biennial exercise was scheduled for August 11, 2020. The Iowa offsite portion was postponed by FEMA RVII on July 16, 2020. The exercise will be rescheduled within 35 months (no later than November 2021) of the previous evaluated exercise.

In addition to the activities and assessments noted in the attached letter, the state and OROs are currently responding to a derecho that caused widespread and devastating damage through central and eastern Iowa, including Clinton and Scott counties. Most if not all non-radiation specific emergency management functions were implemented, including emergency operations management, communications and emergency public information, traffic and access control, shelter management, and others. A Preliminary Capability Assessment was conducted by FEMA RVII following this storm for the State of Iowa and OROs associated with the Duane Arnold Energy Center. Region VII concluded that offsite emergency preparedness remains adequate to provide reasonable assurance that the State of Iowa can implement appropriate measures to protect the health and safety of the public.



STATE OF IOWA

KIM REYNOLDS
GOVERNOR

ADAM GREGG
LT. GOVERNOR

IOWA DEPARTMENT OF HOMELAND SECURITY
AND EMERGENCY MANAGEMENT
V. JOYCE FLINN, HOMELAND SECURITY ADVISOR
AND EMERGENCY MANAGEMENT DIRECTOR

July 10, 2020

Mr. Paul Taylor
Regional Administrator
DHS-FEMA Region VII
11224 Holmes Road
Kansas City, MO 64131

Dear Mr. Taylor,

Iowa is requesting relief from the FEMA Radiological Emergency Preparedness (REP) biennial exercise frequency requirements for the Duane Arnold Energy Center (DAEC) and the Quad Cities Generating Station (QCGS) due to hardship caused by the response efforts to the COVID-19 pandemic. As a result of the ongoing response to the COVID-19 pandemic, the emergency preparedness off-site response organizations (ORO's) that support DAEC including, Benton, Buchanan, Johnson, Linn, Marshall, and Scott counties, and the those that support QCGS including Clinton and Scott counties, as well as the State of Iowa have been greatly impacted. The previous QCGS REP evaluated exercise was held on December 4, 2018, and the next exercise is scheduled for August 11, 2020. The previous DAEC REP evaluated exercise was held on May 15, 2018, and the next exercise is scheduled for September 2, 2020.

The response to the COVID-19 pandemic has been unprecedented. On March 9, 2020 Governor Kim Reynolds issued the first Proclamation of Disaster Emergency activating the disaster response and recovery aspects of the Iowa Department of Homeland Security and Emergency Management's Iowa Emergency Response Plan and those additional response plans applicable to all of Iowa's 99 counties. The Proclamation authorized the use and deployment of all available resources, supplies, equipment, and material as are reasonably necessary to assist the citizens of Iowa. Since the COVID-19 pandemic was first detected, over 32,800 Iowans have tested positive, and there have been 739 deaths. Iowa has implemented a very aggressive testing program with over 350,000 Iowans tested for COVID-19.

The Iowa State Emergency Operations Center (SEOC) and the County Emergency Operations Centers have been activated responding to the pandemic for over four months. First responders, health care workers, state and county officials, and volunteers, and have been taking actions to protect the health and safety of Iowans by taking the following measures:

- Implementing COVID-19 testing and contact tracing
- Providing personal protective equipment (PPE) to local and state jurisdictions. Currently there have been over 1500 missions for distribution of PPE
- Setting limitations on public gatherings
- Implementing social distancing policies

- School closures
- Non-essential business closures

Implementing these measures has been demanding on the ORO's. All organizations have been working tremendous hours coordinating emergency response measures. Specifically, first responders and hospital staff have been doing an extraordinary job in providing health care services to their communities. Although these individuals are unwavering in protecting the citizens of their communities, there is a systemic fatigue present among the ORO's. Given the potential of ongoing impacts from the COVID-19 pandemic, coupled with the current increase in the number of cases which poses a significant risk for community spread of COVID-19, I believe conducting full-scale exercises for DAEC and QCGS during this pandemic would not only add a burden to the over-taxed ORO's, but could put exercise participants at risk of contracting COVID-19.

Iowa has also seen civil unrest across the state to include violent protests, vandalism, and violence towards law enforcement. Two individuals were fatally shot, and a police officer was wounded as shooting and property destruction occurred in Scott County. These incidents have been another operational impact to the emergency responders.

To further aid you in making a determination on our request for relief from exercise demonstration, I want to highlight the continuous success and achievements of the Iowa REP program. I believe these measures will provide FEMA reasonable assurance that Iowa can protect the public health and safety if a radiological emergency were to occur at the DAEC or QCGS nuclear power plants.

1. The success and high standards of the Iowa REP Program have been demonstrated to FEMA during recent evaluated exercises. FEMA has determined no deficiencies have been identified that would impact the capability to protect the health and safety of citizens that live within the emergency planning zones of the DAEC or QCGS nuclear power plants. Iowa is recognized as a leader within the REP community, demonstrating innovative practices and successful operation of the program through frequent presentations at various professional organizations, i.e. National Radiological Emergency Preparedness Conference, the Conference of Radiation Control Program Directors, and the Health Physics Society. Iowa continues to have a high level of radiological emergency preparedness. The Iowa REP program has a depth of knowledge with an experienced offsite response organizations. Many individuals have over 25 years of involvement and expertise in radiological emergency preparedness at both the county and state level.
2. Iowa has developed and implemented an Enhanced Exercise Initiative (EEI) to improve collaboration between offsite response organizations and FEMA. The EEI is a collaborative departure from the traditional FEMA-only evaluation of REP exercises and places a greater emphasis on the ORO to self-identify, document and openly critique their own performance; as well as provide FEMA opportunities to shed light on the all hazards, whole government concepts the REP program provides. The EEI seeks to transform the exercise component of the REP program into one of greater federal, state, local, tribal, and private sector partnership and to foster continuous improvement for the betterment of the REP program as a whole. Iowa has conducted several exercises using the EEI successfully at both QCGS and DAEC.

3. Iowa has a Type-1 Radiological Operations Support Specialist (ROSS). The ROSS program is a means for local health physicists and other personnel with radiological knowledge to support radiological response operations in an emergency. The ROSS can assist response organizations in interpretation and application of data products, provide just in time training to responders, provide tools and resources to facilitate response activities, and put radiological risks in perspective for an incident. The Iowa ROSS representative has provided support and training to several states (most recently Arizona and Michigan) during drills for nuclear detonation response and RadResponder implementation. The Iowa ROSS representative continually coordinates with the ROSS and dose assessment community to develop new training opportunities. The ROSS representative then shared those developed resources with Iowa's dose assessment team to support and implement best practices for Iowa REP's protective action recommendation and protective action decision planning.
4. Recently my office completed a capability assessment of the ORO's for the State of Iowa, DAEC, and the QCGS. This assessment provided assurance to FEMA that during the current COVID-19 pandemic, the State of Iowa continues to have the ability to competently operate response facilities, communications systems, and alert and notification systems. Currently Iowa has in place the following compensatory actions related to the Iowa REP Program for response to a nuclear power plant incident while community mitigation and social distancing measures are required:
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- Long term housing, sheltering, feeding and medical screening of patients

My office has coordinated with the Benton, Clinton, Linn, and Scott County emergency management officials, the Iowa Department of Public Health, the Iowa State Hygienic Laboratory, as well as the NextEra Energy and Exelon Generation in providing this information to request relief from demonstrating the DAEC and QCGS 2020 REP exercises.

Thank you for your consideration of this request. If you, or your staff, require additional information to assist you in making your decision to grant Iowa relief from conducting the 2020 biennial REP exercises with DAEC and QCGS, please do not hesitate to contact me, or Jeremy Sroka, the Iowa REP Program Manager, at 515-323-4324 or at jeremy.sroka@iowa.gov.

Sincerely,



V. Joyce Flinn
Director



FEMA

September 14, 2020

V. Joyce Flinn, Director
Iowa Department of Homeland Security and Emergency Management
7900 Hickman Road, Suite 500
Windsor Heights, IA 50324

Dear Ms. Flinn:

Pursuant to 44 CFR Part 350.9(c), "Exercises," FEMA Region VII received your request for relief from the frequency requirement to conduct the biennial radiological emergency preparedness exercise for the Quad Cities Generating Station scheduled for August 11, 2020. The relief was specifically requested to address the concerns posed by the conduct of a biennial radiological emergency preparedness exercise while offsite response organizations (OROs) are actively responding to the ongoing public health emergency.

The relief request and supporting documents were reviewed by FEMA Region VII Radiological Emergency Preparedness Program (REPP) staff, and several coordination calls were conducted with your REP Program staff and other stakeholders. A recommendation from the Regional Administrator was provided to the Deputy Administrator of Resilience for final approval through the Director of the Technological Hazards Division. Based on the documentation provided and recommendation from the Regional Administrator, the Deputy Administrator of Resilience has approved the request for relief to postpone the Quad Cities Generating Station biennial emergency preparedness exercise, and associated out of sequence evaluations, until no later than November 2021.

This one-time relief approval is provided specifically to address the concerns posed by the conduct of a biennial radiological emergency preparedness exercise while OROs are actively responding to the ongoing public health emergency. FEMA will continue to monitor the response and preparedness capabilities of OROs to assure the response to the current public health emergency does not adversely impact the ability to protect public health and safety in the event of an emergency at a commercial nuclear power plant.

Sincerely,
**PAUL J
TAYLOR**
Paul J. Taylor
Regional Administrator
Region VII

Digitally signed by
PAUL J TAYLOR
Date: 2020.09.14
14:41:31 -05'00'

Enclosures: Attachment 1, Request for relief received from IA HSEMD