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10 CFR 50.12
10 CFR 50, Appendix E

NL-20-069

October 8, 2020

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

Subject: One-time Scheduling Exemption Request from 10 CFR 50, Appendix E
Biennial Emergency Preparedness Exercise Requirements due to
COVID-19 Public Health Emergency

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

In accordance with 10 CFR 50.12, "Specific exemptions," paragraph (a)(2)(v), Entergy Nuclear Operations, Inc. (Entergy) requests an exemption from the requirements of 10 CFR 50, Appendix E, Section IV.F.2.b for Indian Point Nuclear Generating Unit Nos. 2 and 3 (IP2 and IP3, collectively referred to as IPEC). Specifically, Entergy requests a one-time scheduling exemption to postpone the onsite portion of the full-participation biennial emergency preparedness exercise until calendar year 2021.

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency (PHE) for the United States to aid the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19). On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization and, on March 13, 2020, President Donald Trump declared the Coronavirus (COVID-19) pandemic a national emergency.

In March 7, 2020, the Governor of New York issued Executive Order 202, "Declaring a Disaster Emergency in the State of New York," to combat the spread of the COVID-19 virus. Specifically, the Governor imposed sweeping measures to protect public health and safety, including restrictions on businesses and gatherings through Executive Orders. These measures, together known as "New York State on PAUSE" directed all non-essential businesses to close their in-person operations and banned all non-essential gatherings of individuals of any size for any reason.

In response to the COVID-19 public health emergency, as well as the New York Executive Orders, Entergy implemented protective health measures at all its facilities. These measures include social distancing, group size limitations, mandatory use of face masks, pre-entry temperature checks, and various other COVID-19 mitigation strategies. At the present time, these protective health measures significantly impact Entergy's ability to conduct a biennial exercise of its onsite emergency plan.

In response to these declarations, and in accordance with the Entergy Pandemic Response Plan, Entergy initiated isolation activities at IPEC (e.g., social distancing, group size limitations, self-quarantining, etc.) on March 16, 2020. These isolation activities have resulted in the inability to complete the full onsite emergency preparedness biennial exercise that is scheduled for November 17, 2020. In addition, based on the limited amount of available time between the originally scheduled date and the end of 2020, and the continued impact of the COVID-19 PHE, Entergy is unable to reschedule the biennial exercise prior to the end of 2020.


Conducting the IPEC biennial exercise in calendar year (CY) 2021, rather than CY 2020, places the exercise outside the required biennium. Consequently, Entergy requests a one-time schedular exemption to postpone the onsite portion of the biennial emergency preparedness exercise until CY 2021, but prior to expiration of the 35-month interval. This request represents a Special Circumstance, as specified in 10 CFR 50.12(a)(2)(v).

In accordance with the provisions of 10 CFR 50.12, Entergy is submitting a one-time schedular exemption request for 10 CFR 50, Appendix E, Section IV.F.2.b. Justification for the issuance of an exemption is provided in the Enclosure to this letter and is based on guidance provided in References 1 through 4. Entergy requests authorization by December 31, 2020, in order to maintain compliance with 10 CFR 50, Appendix E.

There are no regulatory commitments contained in this request.

Should you have any questions concerning this letter, or require additional information, please contact Mahvash Mirzai at 914-254-7714.

Respectfully,

A handwritten signature in black ink, appearing to read "Ron J. Gaston", with a long horizontal flourish extending to the right.

Ron Gaston

RWG/trj

Enclosure: One-Time Scheduling Exemption Request from 10 CFR 50, Appendix E Biennial
Emergency Preparedness Exercise Requirements

Attachment: IPEC Emergency Response Organization Training and Drills
Performed and Scheduled

- References:
- 1) NRC Regulatory Issue Summary 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," (ADAMS Accession No. ML053390039), dated February 24, 2006
 - 2) U.S. Nuclear Regulatory Commission (NRC) letter to Entergy Nuclear Operations, Inc (Entergy), "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," (ADAMS Accession No. ML20120A003), dated May 14, 2020
 - 3) NRC letter to Entergy, "Addendum to 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," (ADAMS Accession No. ML20223A152), dated September 2, 2020
 - 4) NRC Office of Nuclear Security and Incident Response (NSIR) Temporary Staff Guidance (TSG) TSG-NSIR-2020-01, "COVID-19 Related Exemptions from NRC Regulations - Emergency Preparedness Exercises," (ML20196M030), dated September 11, 2020

cc: Regional Administrator, NRC Region I
NRC Senior Project Manager, NRC NRR DORL
NRC Senior Resident Inspector, Indian Point Energy Center
President and CEO, NYSERDA
New York State (NYS) Public Service Commission

Enclosure

NL-20-069

One-Time Scheduling Exemption Request from 10 CFR 50, Appendix E
Biennial Emergency Preparedness Exercise Requirements

One-Time Scheduling Exemption Request from 10 CFR 50, Appendix E Biennial Emergency Preparedness Exercise Requirements

1.0 SUMMARY DESCRIPTION

In accordance with 10 CFR 50.12, "Specific exemptions," Entergy Nuclear Operations, Inc. (Entergy) requests a one-time scheduling exemption for the Indian Point Nuclear Generating Units Nos. 2 and 3 (IP2 and IP3, collectively referred to as IPEC) from the requirement to conduct the onsite portion a full-participation biennial emergency preparedness (EP) exercise specified in 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Section IV.F.2.b. Justification for the issuance of an exemption is provided below, and is based on guidance provided in References 1 through 5.

This one-time scheduling exemption to allow Entergy to conduct the onsite portion of the IPEC full-participation biennial EP exercise in calendar year 2021 supports continued implementation of the isolation activities (e.g., social distancing, group size limitations, self-quarantining, etc.) to protect required emergency response organization personnel in response to the Coronavirus Disease 2019 (COVID-19). These activities are needed to ensure emergency response organization personnel are isolated from the COVID-19 virus and remain capable of executing the functions of the emergency response organization, as described in the IPEC Emergency Plan.

2.0 BACKGROUND

10 CFR 50, Appendix E, Section IV.F.2.b states:

"Each licensee at each site shall conduct a subsequent exercise of its onsite emergency plan every 2 years."

10 CFR 50, Appendix E, Section IV.F.2.c states:

"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."

On March 7, 2020, the Governor of New York issued Executive Order 202, "Declaring a Disaster Emergency in the State of New York," to combat the spread of the COVID-19 virus. Specifically, the Governor imposed sweeping measures to protect public health and safety, including restrictions on businesses and gatherings through Executive Orders. These measures, together known as "New York State on PAUSE" directed all non-essential businesses to close their in-person operations and banned all non-essential gatherings of individuals of any size for any reason.

In response to the COVID-19 public health emergency, as well as the New York Executive Orders, Entergy implemented protective health measures at all its facilities. These measures include social distancing, group size limitations, mandatory use of face masks, pre-entry temperature checks, and various other COVID-19 mitigation strategies. At the present time, these protective health measures significantly impact Entergy's ability to conduct a biennial exercise of its onsite emergency plan. In addition, based on the limited amount of available time between the originally scheduled date and the end of 2020, and the continued impact of the COVID-19 PHE, Entergy is unable to reschedule the biennial exercise prior to the end of 2020.

3.0 TECHNICAL JUSTIFICATION OF ACCEPTABILITY

The U.S. Centers for Disease Control (CDC) has issued recommendations advising social distancing to prevent the spread of the COVID-19 Virus. Entergy and the State of New York have implemented pandemic plans which include social distancing, group size limitations and self-quarantine. Ideally, this will limit the spread of the virus among the station staff and off-site personnel.

IPEC's last biennial EP exercise was conducted on September 25, 2018. Since that time, Entergy has conducted numerous drills, exercises, and other training activities at IPEC that have exercised its emergency response strategies. These are tabulated and listed in the Attachment to this Enclosure. In addition, New York State officials have participated, or are scheduled to participate in the following:

- January 23, 2019 – Limited state and local participation
- May 22, 2019 – Limited state and local participation
- September 10, 2019 – Full state and local participation
- November 20, 2019 – Full state and local participation
- January 29, 2020 – Limited state and local participation
- September 23, 2020 - Limited state and local participation
- November 17, 2020 – Full state and local participation

Entergy will continue to conduct drills, exercises, and other training activities at IPEC that exercise its emergency response strategies, as tabulated in the Attachment to this Enclosure.

New York State and local authorities recently participated in a September 23, 2020 limited participation drill, and are expected to participate in a full off-site state and local participation exercise on November 17, 2020. Entergy has shown a good faith effort to comply with the regulation by committing to support the November off-site exercise to ensure that New York State and the surrounding four counties can demonstrate objectives to FEMA for evaluation. The demonstration criteria that cannot be observed by FEMA during this exercise, due to COVID-19 restrictions, will be demonstrated out of sequence, prior to December 31, 2020. Upon completion of the November 17th exercise and out-of-sequence FEMA evaluations, all offsite criteria will be satisfactorily demonstrated, thus fulfilling the requirements of 10 CFR 50, Appendix E, Section IV.F.2.c.

Entergy will reschedule the onsite portion of the biennial IPEC EP Exercise to occur prior to August 25, 2021, which is within 35 months from the month of the previously evaluated exercise (i.e., September 25, 2018). If this exemption request is granted to allow Entergy to conduct the

IPEC CY 2020 biennial exercise in CY 2021, future biennial EP exercises will continue to be held in even years.

In addition, NRC Region I has indicated to Entergy that, if IPEC receives approval to reschedule the onsite portion of the currently scheduled biennial exercise until 2021, the scope of the planned EP Program inspection in November 2020, as documented in Reference 5, will be expanded to include the following additional NRC Inspection Procedures. This expanded EP Program Inspection will confirm, with reasonable assurance, Entergy's maintenance of an acceptable level of emergency preparedness during the exemption period.

- IP 71114.02, "Alert and Notification System Testing"
- IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"
- IP 71114.05, "Maintenance of Emergency Preparedness"

4.0 JUSTIFICATION OF EXEMPTION

10 CFR 50.12, "Specific exemptions," states that the NRC may grant exemptions from the requirements of the regulations of this part provided three conditions are met. They are:

1. The exemptions are authorized by law.
2. The exemptions will not present an undue risk to the public health and safety, and
3. The exemptions are consistent with the common defense and security.

The justifications to allow an exemption to the onsite portion of a full-participation biennial EP exercise of 10 CFR 50, Appendix E, Section IV.F.2.b at IPEC are described below.

1. This exemption is authorized by law

The biennial EP exercise for the emergency response organization specified in 10 CFR 50, Appendix E, Section IV.F.2.b is not required by any statute. The requested exemption is authorized by law in that no law precludes the activities covered by this exemption request. Granting of the request does not result in a violation of the Atomic Energy Act of 1954, as amended.

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

The underlying purpose of 10 CFR 50, Appendix E, Section IV.F.2.b requiring licensees to conduct a biennial EP exercise is to ensure that the Emergency Response Organization (ERO) personnel are familiar with their duties and to test the adequacy of the emergency plan. In addition, 10 CFR 50, Appendix E Section IV.F.2.b also requires licensees to maintain adequate emergency response capabilities during intervals between biennial EP exercises by conducting drills to exercise the principal functional areas of emergency response. Consistent with this requirement, Entergy has conducted numerous drills, exercises, and other training activities since the last evaluated biennial EP exercise, including activation of all onsite emergency response facilities during those drills with State participation. Most recently, these activities included a drill with State participation that was conducted on September 23, 2020, as well as the commitment to support a full off-site state and local participation exercise on November 17, 2020. Entergy has concluded that these measures have adequately exercised the principle functional areas of emergency response

at IPEC, and will maintain an acceptable level of emergency preparedness during the exemption, thus satisfying the underlying purpose of the rule.

In addition, NRC Region I has indicated to Entergy that, if IPEC receives approval to defer the onsite portion of the currently scheduled biennial exercise until 2021, the scope of the planned EP Program inspection in November 2020, as documented in Reference 5, will be expanded to include the following additional NRC Inspection Procedures. This expanded EP Program Inspection will confirm, with reasonable assurance, Entergy's maintenance of an acceptable level of emergency preparedness during the exemption period.

- IP 71114.02, "Alert and Notification System Testing"
- IP 71114.03, "Emergency Response Organization Staffing and Augmentation System"
- IP 71114.05, "Maintenance of Emergency Preparedness"

Postponing the on-site portion of the Exercise from the previously scheduled date of November 17, 2020 to CY 2021 does not create any new accident precursors. The ability to reschedule the exercise in CY 2020 was not feasible due to the Exercise currently being scheduled in the month of November. The probability and consequences of postulated accidents are not increased, and an acceptable level of emergency preparedness is maintained. Therefore, there is no undue risk to public health and safety.

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

The proposed exemption would allow rescheduling of the onsite portion of the biennial EP exercise from the previously scheduled date of November 17, 2020, to CY 2021. This change to the EP exercise schedule has no relation to security issues. The common defense and security are not impacted by this exemption.

In addition to the three conditions discussed above, paragraph (a)(2) of the regulation states that the NRC will not consider granting an exemption unless special circumstances are present. Under 10 CFR 50.12(a)(2)(v), special circumstances are present whenever the exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation. The requested exemption to conduct the onsite EP exercise in CY 2021 instead of CY 2020 would grant only temporary relief from the applicable regulation. Entergy has made good faith efforts to comply with the regulation based on:

- The drills, exercises, and training activities conducted at IPEC since the last evaluated biennial EP exercise;
- Completion of a limited state and local participation training drill on September 23, 2020;
- Entergy's efforts to coordinate a rescheduled date that is agreeable with FEMA, NRC Region I inspectors, the State of New York, and local counties;
- Entergy's planned support of the offsite portion (i.e., full state and local participation) of the November 2020 Exercise; and
- Entergy's planned support of an expanded NRC EP Program Inspection in 2020.

5.0 CONCLUSION

As demonstrated above, Entergy considers that this exemption request is in accordance with the criteria of 10 CFR 50.12. Specifically, the 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. A one-time schedular exemption from the biennial EP exercise requirements of 10 CFR 50, Appendix E, Section IV.F.2.b is required during the 2020 COVID-19 Pandemic.

6.0 ENVIRONMENTAL ASSESSMENT

Entergy is requesting an exemption from certain requirements of 10 CFR 50, Appendix E, for IPEC. Specifically, Entergy is requesting a one-time schedular exemption from the requirements of 10 CFR 50, Appendix E, Section IV.F.2.b for conducting a biennial EP exercise. The following information is provided in support of an environmental assessment and finding of no significant impact for the proposed exemption.

Entergy has determined that the exemption involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite; that there is no significant increase in individual or cumulative public or occupational radiation exposure; that there is no construction impact; and there is no significant increase in the potential for or consequences from a radiological accident. Accordingly, the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this proposed exemption request.

7.0 REFERENCES

1. NRC Regulatory Issue Summary 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," (ADAMS Accession No. ML053390039), dated February 24, 2006
2. U.S. Nuclear Regulatory Commission (NRC) letter to Entergy Nuclear Operations, Inc (Entergy), "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," (ML20120A003), dated May 14, 2020
3. NRC letter to Entergy, "Addendum to 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," (ML20223A152), dated September 2, 2020
4. NRC Office of Nuclear Security and Incident Response (NSIR) Temporary Staff Guidance (TSG) TSG-NSIR-2020-01, " COVID-19 Related Exemptions from NRC Regulations - Emergency Preparedness Exercises," (ML20196M030), dated September 11, 2020
5. NRC letter to Entergy, "Updated Inspection Plan for Indian Point Energy Center, Unit 3 (Inspection Report 05000286/2020005)," (ML20237F429), dated August 31, 2020

Attachment to Enclosure

NL-20-069

IPEC Emergency Response Organization
Training and Drills Performed and Scheduled

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	Offsite Response Organization (ORO) Participation
Radiological Environmental Monitoring Program Drill October 17, 2018	Radiological Monitoring Teams	<ul style="list-style-type: none"> • Demonstrate the ability of a Field Monitoring Team (FMT) to support emergency operations through the response to and analysis of simulated elevated airborne/liquid samples following a simulated emergency event involving the release of radioactive material. 	N/A
Accountability and Assembly Drill November 5, 2018	Full station participation	<ul style="list-style-type: none"> • Demonstrate the ability to perform accountability for all individuals in the protected area within 30 minutes of declaration. 	N/A
Training Drill December 12, 2018	"C" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Alternate Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operation • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the Offsite Monitoring Teams (OMTs) to support emergency response activities. 	No ORO participation was received for this training drill. Entergy Offsite Liaisons reported to the State and County Emergency Operations Centers.
SAMG Training January 2019	Engineering, Operations personnel; SAMG decision makers	<ul style="list-style-type: none"> • Implementation of Beyond Design Bases strategies, procedures, and guidance and integration of offsite resources with onsite response. 	N/A

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Training Drill January 23, 2019	"B" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Alternate Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	State and Local Governments for Communications and Notifications. Emergency Offsite Liaisons reported to the State and County Emergency Operations Centers.
Training Drill May 22, 2019	"C" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations/ Health Physics Drill (in-plant monitoring) • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Accountability and Assembly Drill • SAMG drill (Demonstrated the ability to implement Beyond Design Bases Mitigating Strategies) • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	State and Local Governments for Communications and Notifications. Emergency Offsite Liaisons reported to the State and County Emergency Operations Centers.
Offsite Monitoring Team Training July 2019	FMTs/Offsite Team Coordinators	<ul style="list-style-type: none"> • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	N/A

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Dose Assessment Training August 2019	Dose Assessors and Radiological Assessment Coordinators	<ul style="list-style-type: none"> • Demonstrate the capability to determine the magnitude of radioactive releases or perform dose assessments based on plant parameters, effluent monitors, field data and meteorological conditions. • Demonstrate the ability to determine the release rate and projected dose when effluent monitors are off-scale or inoperable. 	N/A
WANO Drill August 20, 2019	"D" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	No ORO participation was received for this training drill. Entergy Offsite Liaisons reported to the State and County Emergency Operations Centers.
Limited Scope Drill September 10, 2019	"A" Team EOF and JIC facilities only	<ul style="list-style-type: none"> • REMP Drill (Demonstrate the ability of an FMT to support emergency operations) • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Emergency Operations Facility Operations • Joint Information Center Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate the adequacy of OMTs to support emergency response activities. 	Full State and Local Government participation. This demonstrated Communication between the nuclear facility, state and local emergency operations centers and field assessment teams. Entergy Offsite Liaisons reported to the State and County Emergency Operations Centers.

IPEC Emergency Response Organization
Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Training Drill November 20, 2019	"A" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations/ Health Physics Drill (in-plant monitoring) • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Health Physics In-Plant Monitoring • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	Full State and Local Government participation. This demonstrated Communication between the nuclear facility, state and local emergency operations centers and field assessment teams. Emergency Offsite Liaisons reported to the State and County Emergency Operations Centers.
SAMG Training January 2020	Engineering and Operations/SAMG decision makers	<ul style="list-style-type: none"> • Implementation of Beyond Design Bases strategies, procedures, and guidance and integration of offsite resources with onsite response. 	N/A
Training Drill January 29, 2020	"D" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations/ Health Physics Drill (in-plant monitoring) • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Health Physics In-Plant Monitoring • Radiological Monitoring and Dose Assessment • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	State and Local Governments for Communications and Notifications. Emergency Offsite Liaisons reported to the State and County Emergency Operations Centers.

IPEC Emergency Response Organization
Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
TSC/OSC Tabletop Drill June 22-25, 2020	All TSC/OSC Participants	<ul style="list-style-type: none"> • Demonstrate the adequacy of the OSC to support emergency response activities. • Demonstrate the adequacy of the TSC to support emergency response activities. 	No ORO participation was received for this training drill.
(A)EOF Tabletop Drill July 20-24, 2020	All (A)EOF Participants	<ul style="list-style-type: none"> • Demonstrate the adequacy of the EOF to support emergency response activities. • Accident Assessment and Classification • Command and Control Direction and Coordination of the Emergency response • Public Alerting and Notification Procedures Protective Action Decision-making 	No ORO participation was received for this training drill.
Offsite Monitoring Team Training August 2020	FMTs/Offsite Team Coordinators	<ul style="list-style-type: none"> • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	N/A
JIC Tabletop Drill August 17-21, 2020	All JIC Participants	<ul style="list-style-type: none"> • JIC Support of Emergency Operations • Media Briefings • Exchange of Public Information • Public Inquiry (Rumor Control) • Release of Information 	No ORO participation was received for this training drill.
Limited Scope Drill September 23, 2020	"B" Team ERO-minimum Staffing in all ERF's (COVID-19 controls)	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations/ Health Physics Drill (in-plant monitoring) • Alternate Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making 	State & local Governments for Communications, PIO and participation in OMT Teams. This demonstrates Communication between the nuclear facility, state & local EOCs and OMT teams. Entry Offsite Liaisons reported to the State and County Emergency Operations Centers.
Accountability and Assembly Drill October 2020	Full station participation	<ul style="list-style-type: none"> • Demonstrate the ability to perform accountability for all individuals in the protected area within 30 minutes of declaration 	N/A

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Training Drill January 20, 2021 Post Shut down ERO	"D" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations/ Health Physics Drill (in-plant monitoring) • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Health Physics In-Plant Monitoring • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD
Training Drill February 3, 2021 Post Shut down ERO	"B" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD

IPEC Emergency Response Organization
Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Training Drill February 24, 2021 Post Shut down ERO	"A" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD
Training Drill March 10, 2021 Post Shut down ERO	"C" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
NRC Evaluated Exercise-Reduced Staffing ERO (proposed dates) March 17, 2021 or April 14, 2021	"D" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD
Training Drill September 1, 2021 Post Shut down ERO	"D" Team ERO-Full station participation including all ERF's	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD

IPEC Emergency Response Organization
 Training and Drills Performed and Scheduled

Training or Evaluations	IPEC Participation	Integrated Capability and Functions Tested during this Drill/Training	ORO Participation
Training Drill November 3, 2021 Post Shut down ERO	"A" Team ERO-EOF/JIC participation only	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD
Training Drill December 1, 2021 Post Shut down ERO	"A" Team ERO-EOF/JIC participation only	<ul style="list-style-type: none"> • Accident Assessment and Classification • Command and Control Direction and coordination of the emergency response • Technical Support Center Operations • Operations Support Center Operations • Emergency Operations Facility Operations • Joint Information Center Operations • Control Room Operations • Incident Command Post Operations • Public Alerting and Notification procedures • Radiological Monitoring and Dose Assessment • Protective Action Decision Making • Demonstrate ability to monitor radiological releases to the environment in the field • Demonstrate adequacy of the OMTs to support emergency response activities. 	TBD