

Brown, Katie-Elizabeth Rosser

From: Jurek, Shane
Sent: Friday, October 9, 2020 4:23 PM
To: Goetz, Sue (NRC PM)
Cc: Krick, Melisa; Gorman, James A; Brown, Katie-Elizabeth Rosser; szalesny@energyharbor.com; nicholas.alexakos@exeloncorp.com
Subject: Submittal of Pennsylvania Letter Requesting Exemption from Biennial Exercise Requirements for Pennsylvania Nuclear Power Plants in Calendar Year 2020
Attachments: Add'tl Information for NRC Exemption Req 09-Oct-2020.pdf

Sue,

On October 6, 2020, a clarification call was held between the Nuclear Regulatory Commission (NRC) and Susquehanna Nuclear, LLC (Susquehanna) regarding the exemption request submitted by Susquehanna on September 28, 2020 (ADAMS Accession No. ML20272A020). The NRC requested clarification as to whether the Commonwealth of Pennsylvania was included in the Offsite Response Organizations (OROs) seeking exemption from the 10 CFR Part 50, Appendix E, Section IV.F.2.c requirement for offsite biennial exercises in calendar year 2020. In the attached letter, the Commonwealth of Pennsylvania clearly identifies themselves as a Susquehanna Steam Electric Station (SSES), Beaver Valley Power Station (BVPS), and Peach Bottom Atomic Power Station (PBAPS) ORO seeking exemption from the 10 CFR Part 50, Appendix E, Section IV.F.2.c requirement for offsite biennial exercises in calendar year 2020. This attached letter also covers the exemption requests submitted by Energy Harbor Nuclear Corporation and Exelon Corporation for their Pennsylvania stations. As requested by NRC staff, representatives from Energy Harbor Nuclear Corporation and Exelon Corporation are on copy for awareness.

Thank you

Shane

Shane Jurek, PE

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October 9, 2020

Ms. Megean M. Brown
Emergency Preparedness Supervisor
Susquehanna Steam Electric Station
Susquehanna Nuclear, LLC.
769 Salem Boulevard
Berwick, Pennsylvania 18603

Dear Ms. Brown,

On October 6, 2020, the Pennsylvania Emergency Management Agency (PEMA) was made aware of a clarification call held between the Nuclear Regulatory Commission (NRC) and Susquehanna Nuclear, LLC (Susquehanna) representatives regarding the exemption request submitted by Susquehanna on September 28, 2020. The NRC requested clarification as to whether the Commonwealth of Pennsylvania was included in the Offsite Response Organizations (OROs) seeking exemption from the 10 CFR Part 50, Appendix E, Section IV.F.2.c requirement for offsite biennial exercises in calendar year 2020. This letter is intended to clearly identify the Commonwealth of Pennsylvania as a Susquehanna Steam Electric Station (SSES), Beaver Valley Power Station (BVPS), and Peach Bottom Atomic Power Station (PBAPS) ORO seeking exemption from the 10 CFR Part 50, Appendix E, Section IV.F.2.c requirement for offsite biennial exercises in calendar year 2020. This letter also covers the exemption requests submitted by Energy Harbor Nuclear Corporation on September 22, 2020 and Exelon Corporation on September 25, 2020.

As the Commonwealth continues to respond to the COVID-19 pandemic, we have significant concerns regarding the calendar year federally-evaluated exercises at SSES, BVPS, and PBAPS. PEMA and the OROs are prepared to respond to an actual incident at the aforementioned stations, but participation in an exercise, with the current COVID-19 mitigation measures and anticipation of continuing precautions, puts an undue burden on our staff and volunteers.

While we have made reasonable effort towards rescheduling the exercises during the calendar year 2020, we have been unsuccessful with the continued number of COVID-19 cases remaining steady within our Commonwealth. According to the Center for Disease Control and Prevention (CDC) COVID Data Tracker, Pennsylvania ranks twelfth in the United States regarding the amount of new cases within the last seven days. Additionally, Governor Tom Wolf's restrictions and guidelines have not yet been lifted (e.g., social distancing, masks, gatherings). Due to these restrictions and guidelines, PEMA, on behalf of the OROs associated with SSES, BVPS, and PBAPS, continues to work with the Federal Emergency Management Agency (FEMA) to coordinate request for exercise credit for calendar year 2020.

PEMA, in conjunction with the OROs, is in agreement with the exemption requests submitted by Susquehanna, Energy Harbor Nuclear Corporation, and Exelon Corporation, and all remain committed to maintaining our radiological emergency plans. The stations' requests for exemption

Ms. Megean M. Brown

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will not adversely affect PEMA's and the OROs' ability to maintain response capability to support emergency response activities. As stated above, we are fully prepared for and can handle any emergency throughout this pandemic, including an actual incident at SSES, BVPS, and PBAPS. Our main focus is protecting and keeping our citizens safe, and an exercise would only further put our staff, counties, and volunteers in unnecessary danger of potentially contracting COVID-19.

This letter serves as clarification for all exemption requests from the offsite biennial exercises in calendar year 2020 (BVPS, SSES, and PBAPS). Please accept this clarification for all three nuclear power plants.

Should you have any questions or concerns, please contact Mr. Stephen Bekanich, Deputy Director for Preparedness, at 717-651-2231 or via email at sbekanich@pa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Padfield", written in a cursive style.

David R. Padfield

Director, PA Emergency Management Agency

cc: Mr. Nicholas Alexakos, Exelon Corporation
Mr. Sean Zalesny, Energy Harbor Nuclear Corporation