



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 24, 2020

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 – EXEMPTION FROM ANNUAL FORCE-ON-FORCE EXERCISE REQUIREMENT OF 10 CFR PART 73, APPENDIX B, “GENERAL CRITERIA FOR SECURITY PERSONNEL,” SUBSECTION VI.C.3(I)(1) (EPID L-2020-LLE-0196 [COVID-19])

Dear Sir or Madam:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has approved an exemption from a specific requirement of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 73, Appendix B, Section VI, “Nuclear Power Reactor Training and Qualification Plan for Personnel Performing Security Program Duties,” for Grand Gulf Nuclear Station, Unit 1 (Grand Gulf, GGN) for calendar year (CY) 2020. This action is in response to the Entergy Operations, Inc. (Entergy, the licensee) application dated November 13, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20318A386), that requested an exemption from 10 CFR Part 73, Appendix B, Section VI, subsection C.3.(I)(1), regarding annual force-on-force (FOF) exercises for CY 2020 at Grand Gulf.

The requirements in 10 CFR Part 73, Appendix B, Section VI, subsection C.3.(I)(1) state, in part:

Each member of each shift who is assigned duties and responsibilities required to implement the safeguards contingency plan and licensee protective strategy participates in at least . . . one (1) force-on-force exercise on an annual basis. Force-on-force exercises conducted to satisfy the NRC triennial evaluation requirement can be used to satisfy the annual force-on-force requirement for the personnel that participate in the capacity of the security response organization.

The purpose of the annual licensee conducted FOF exercise is to ensure that the site security force maintains its contingency response readiness. Participation in the annual FOF exercises also supports the requalification of security force members.

On January 31, 2020, the U.S. Department of Health and Human Services declared the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) for the United States. Subsequently, the Centers for Disease Control and Prevention issued recommendations (e.g., social distancing, limiting assemblies) to limit the spread of COVID-19. On October 19, 2020, (ADAMS Accession No. ML20266G289), the NRC granted the licensee’s previous request for temporary exemption from 10 CFR Part 73, Appendix B, Section VI, subsection C.3.(I)(1). That exemption is set to expire on December 31, 2020. As such, the licensee is required to conduct

any missed annual licensee conducted FOF exercises by December 31, 2020.

Entergy's application dated November 13, 2020, states the following:

- The PHE is still in effect and will be for an unknown period of time. It is also unknown when vaccinations will be available to the general public or what impact the virus will have this winter. The number of COVID-19 cases in the State of Mississippi are on an upward trend. Entergy has not relaxed their requirements for social distancing, minimizing group size, self-quarantining, etc., since the onset of the PHE. Face coverings, social distancing and other protective measures are being used to minimize potential COVID-19 exposure risks. This is especially important in space limited areas, such as, bullet resistant enclosures. The annual FOF exercises require three security teams to be onsite and within close proximity during briefings, conduct of the drills and critiques. The bullet resistant enclosures don't lend themselves to adequate social distancing for the on-duty officer, drill play officer and the controller.
- Entergy had scheduled these requalification activities to comply with the regulation. However, these activities must be exempted for the year 2020 to allow continued implementation of the Entergy pandemic plan mitigation strategies. Granting of this exemption will continue to support the isolation protocols necessary to protect essential site personnel. These restrictions are needed to ensure personnel are isolated from the COVID-19 disease and remain capable of maintaining plant security.
- Maintaining a healthy workforce is preferable to having a sick workforce that is unavailable during a pandemic.
- To maintain contingency response readiness, GGN has continued to conduct quarterly tactical response drills, including tabletop, timeline, and limited-scope tactical drills. GGN also continues to conduct the following annual security requalification requirements that reinforce FOF exercise-related skills: firearms familiarization, daylight qualification course, night fire qualification course, tactical qualification course, on-the-job training, physical examination and fitness test, weapons range activity (on a 4-month periodicity), and written exam. In addition, and in accordance with the approved temporary exemption granted on October 19, 2020, GGN conducted tabletop exercises and reviewed lessons learned of past exercises with all impacted security personnel.

This exemption is specific to CY 2020 and GGN security personnel who have previously demonstrated proficiency and are currently qualified in accordance with the requirements of 10 CFR Part 73, Appendix B, Section VI. Entergy stated that given the proposed exemption does not change physical security plans or the defensive strategy; impacted security personnel continue to maintain proficiency with the knowledge, skills and abilities required to effectively implement the protective strategy to protect the station against the design basis threat because GGN has continued to conduct other training requalification requirements; and security personnel will continue to be monitored regularly by supervisory personnel and have implemented controls as identified in the temporary exemption granted on October 19, 2020,

granting the requested exemption will not endanger or compromise the common defense or security, or safeguarding GGN. Additionally, the November 13, 2020, request identified site-specific actions listed above that will be implemented at GGN to maintain contingency response readiness, consistent with the NRC staff's October 13, 2020, letter (ADAMS Accession No. ML20273A120). The licensee requested an exemption for completing its licensee-conducted FOF exercises required in CY 2020.

Pursuant to 10 CFR 73.5, "Specific exemptions," the Commission may, upon application by any interested person or on its own initiative, grant exemptions from the requirements of 10 CFR Part 73 when the exemptions are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest.

In accordance with 10 CFR 73.5, the Commission may grant an exemption from the regulations in 10 CFR Part 73 that is authorized by law. The NRC staff has reviewed the exemption request and finds that granting the proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or other laws. Therefore, the NRC staff finds that the exemption is authorized by law.

In accordance with 10 CFR 73.5, the Commission may grant an exemption from the regulations in 10 CFR Part 73 when the exemption will not endanger life or property or the common defense and security. This exemption will only apply to licensee security personnel who are already satisfactorily qualified on the security requirements in 10 CFR Part 73, Appendix B, Section VI. Based on this fact, and its review of the controls Entergy will implement to ensure contingency response readiness, including continuing to conduct quarterly tactical response drills and other security qualification requirements, the NRC staff has reasonable assurance that the security force at Grand Gulf will maintain its proficiency and readiness to implement the licensee's protective strategy and adequately protect the site. Therefore, the NRC staff concludes that the proposed exemption would not endanger life or property or the common defense and security.

In accordance with 10 CFR 73.5, the Commission may grant an exemption from the regulations in 10 CFR Part 73 when the exemption is in the public interest. The NRC staff finds that the exemption from the annual FOF requirement in 10 CFR Part 73, Appendix B, Section VI, subsection C.3.(l)(1), for CY 2020 would facilitate the licensee's efforts to maintain a healthy workforce capable of operating the plant safely and implementing the site's protective strategy reducing the likelihood of security personnel being exposed to the COVID-19 virus because of their involvement in a FOF exercise. The NRC staff concludes that granting the exemption for CY 2020 is in the public interest because it allows the licensee to maintain the required security posture at Grand Gulf, while enabling the facility to continue to provide electrical power to the Nation.

Environmental Considerations

NRC approval of this exemption request is categorically excluded under 10 CFR 51.22(c)(25), and there are no special circumstances present that would preclude reliance on this exclusion. The NRC staff determined, per 10 CFR 51.22(c)(25)(vi)(E), that the requirements from which this exemption is sought involve education, training, experience, qualification, requalification, or other employment suitability requirements. The NRC staff also determined that approval of this exemption request involves no significant hazards consideration because it does not authorize any physical changes to the facility or any of its safety systems, nor does it change any of the assumptions or limits used in the facility licensee's safety analyses or introduce any new failure modes. There is no significant change in the types or significant increase in the amounts of any

effluents that may be released offsite because this exemption does not affect any effluent release limits as provided in the facility licensee's technical specifications or by the regulations in 10 CFR Part 20, "Standards for Protection Against Radiation." There is no significant increase in individual or cumulative public or occupational radiation exposure because this exemption does not affect limits on the release of any radioactive material or the limits provided in 10 CFR Part 20 for radiation exposure to workers or members of the public. There is no significant construction impact because this exemption does not involve any changes to a construction permit; and no significant increase in the potential for or consequences from radiological accidents because this exemption does not alter any of the assumptions or limits in the facility licensee's safety analysis. In addition, the NRC staff determined that there would be no significant impacts to biota, water resources, historic properties, cultural resources, or socioeconomic conditions in the region. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the approval of this exemption request.

Conclusions

Accordingly, the NRC has determined that pursuant to 10 CFR 73.5, the exemption is authorized by law, will not endanger life or property or the common defense and security, and is otherwise in the public interest. Therefore, the Commission hereby grants the licensee's request to exempt Grand Gulf from the annual FOF exercise requalification requirement of security personnel in subsection C.3.(I)(1) of 10 CFR Part 73, Appendix B, Section VI. This exemption applies only to those FOF exercises required during CY 2020.

If you have any questions, please contact the Grand Gulf project manager, Siva P. Lingam, at 301-415-1564 or via e-mail at Siva.Lingam@nrc.gov.

Sincerely

Craig G. Erlanger, Director
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-416

cc: Listserv

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ADAMS Accession Nos. ML20323A047

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