

From: Chawla, Mahesh
Sent: Thursday, November 19, 2020 4:15 PM
To: 'Garcia, Richard M.'
Cc: Lee, Pete; Bowers, Anthony; Dixon-Herrity, Jennifer
Subject: DRAFT - Request for Additional Information - Columbia Generating Station - One -Time Exemption From 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force -On-Force Exercises Due To COVID-19 Pandemic - EPID L-2020-LLE-0172

Dear Mr. Garcia,

By letter dated October 29, 2020, (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20303A286), Energy Northwest requests a one-time exemption from the annual force-on-force (FOF) requirement of Title 10 of the *Code of Federal Regulations* (CFR) Part 73, Appendix B, Section VI, subsection C.3.(I)(1) for Columbia Generating Station (Columbia). The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review of the subject exemption request. Please arrange a clarification teleconference with the NRC staff to discuss the requested information:

Request For Additional Information

Basis:

By letter dated October 29, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20303A286), Energy Northwest requests a one-time exemption from the annual force-on-force (FOF) requirement of Title 10 of the *Code of Federal Regulations* (CFR) Part 73, Appendix B, Section VI, subsection C.3.(I)(1) for Columbia Generating Station (Columbia). Appendix B to 10 CFR Part 70, Section VI.C.3.(I)(1) states:

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) tactical response drill on a quarterly basis and one (1) force-on-force exercise on an annual basis.

In response to the ongoing COVID-19 public health emergency (PHE), many licensees requested and was granted a temporary exemption from requirements of 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1), regarding annual FOF exercises. Energy Northwest indicated that it did not request a temporary exemption, as Energy Northwest's FOF was not scheduled until October 2020 and the duration of the PHE was unknown. Therefore, Energy Northwest's decision was made not to pursue the temporary exemption at that time. Energy Northwest states that "[t]he PHE has not ended and Energy Northwest's ability is challenged to safely conduct annual FOF exercises within the perimeters of the isolation protocols which are still in place nationally and in the State of Washington. Energy Northwest requests approval of this exemption to 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, and the health and safety of the public Issue.

On October 13, 2020, the NRC issued updated guidance for licensees that require exemptions from CY 2020 annual FOF exercises during the COVID-19 PHE (ADAMS Accession No. ML20273A058). The guidance states, in part:

. . . Since the NRC issued the April 2020 letter, some licensees have taken measures recommended by Federal, State, and local authorities to help protect their personnel, including security personnel, from exposure to COVID-19. These measures include the implementation of COVID-19-related controls such as the widespread use of face coverings for site personnel, frequent surface sanitization and handwashing, and social distancing (i.e., maintaining 6 feet of separation between individuals where practical). Accordingly, some of these licensees have been able to resume many routine activities with little or no disruption or with the use of other controls, to accomplish the same tasks safely. In addition, due to site-specific configurations and implementation of certain safety measures, some commercial power reactor and material licensees have successfully conducted their required annual FOF exercises during the PHE without adversely impacting the sites' security staffing or operations.

Nevertheless, the impacts of COVID-19 are still ongoing for some licensees and will likely extend beyond December 31, 2020. These circumstances may prevent licensees from completing their missed CY 2020 FOF exercises by December 31, 2020. To address this situation, the NRC is prepared to expedite consideration of requests for an exemption that would relieve licensees from making up any missed CY 2020 annual FOF exercises.

This updated guidance also requests that licensees should, in addition to describing how they intend to maintain contingency response readiness, submit the following information:

- For licensees that have not previously been granted a temporary exemption from the annual FOF exercise requirement, a discussion as to why the licensee is unable to perform a CY 2020 FOF exercise before December 31, 2020, due to continuing COVID-19 PHE impacts. In support of the new exemption request, these licensees should include the information requested in Enclosure C to the April 20, 2020, letter.
- In addition to the information above, licensees requesting an exemption from the CY 2020 annual FOF exercise requirement, whether previously granted an exemption for the annual FOF exercise requirement or not, should provide a description of how they intend to maintain contingency response readiness.

RAI

Describe the site-specific condition(s), including site-specific COVID-19-related impacts, that will prevent Energy Northwest from completing its CY 2020 annual FOF exercise prior to December 31, 2020.

If you have any further question, please feel free to contact me. Thanking you,

Sincerely,

Mahesh Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission

ph: 301-415-8371
Docket No. 50-397

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11/19/2020	11/19/2020

Hearing Identifier: NRR_DRMA
Email Number: 902

Mail Envelope Properties (DM8PR09MB68537A22610AFBB07787C711F1E00)

Subject: DRAFT - Request for Additional Information - Columbia Generating Station - One
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Sent Date: 11/19/2020 4:15:24 PM

Received Date: 11/19/2020 4:15:00 PM

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Tracking Status: None

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Tracking Status: None

Post Office: DM8PR09MB6853.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	5800	11/19/2020 4:15:00 PM

Options

Priority: Normal

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date: