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10 CFR 50.12  
10 CFR 50, Appendix E

RBG-48061

December 3, 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

River Bend Station, Unit 1  
NRC Docket No. 50-458  
Renewed Facility Operating License No. NPF-47

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 River Bend Station (RBS). Specifically, Entergy requests a one-time scheduling exemption to postpone the onsite portion of the full-participation biennial emergency preparedness exercise until calendar year (CY) 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 COVID-19 pandemic a national emergency. In addition, the State of Louisiana has declared a public health emergency and issued restrictions put in place to prevent the spread of the virus as well as measures to reduce the amount of interaction between personnel.

In response to these declarations, and in accordance with the Entergy Pandemic Response Plan, Entergy initiated isolation activities at RBS (e.g., social distancing, group size limitations, self-quarantining, etc.) on March 16, 2020. These isolation activities caused the biennial exercise originally scheduled for June 24, 2020 to be rescheduled to December 1, 2020 in an effort to complete the biennial exercise in CY 2020 and to avoid the need for an exemption from the NRC. Entergy sought and received a temporary exemption (Reference 6) from the requirements of 10 CFR 50, Appendix E, Section IV.F.2.c regarding the performance of the CY 2020 biennial exercise for responsible offsite response organizations (ORO) in order to protect

required ORO personnel in response to the COVID-19 PHE. The ongoing threat of COVID-19 spread resulted in the inability to safely conduct the biennial exercise that was rescheduled from June 24, 2020 to December 1, 2020. Based on the threat to the health of plant personnel including emergency planning, operations, maintenance and security, and the uncertainty of how long the impacts of the COVID-19 PHE will continue, the need to seek a one-time exemption regarding onsite participation in the CY 2020 River Bend biennial exercise was determined to be the most appropriate action. Due to the limited amount of available time between the rescheduled date of December 1, 2020 and the end of CY 2020, and the continued impact of the COVID-19 PHE, Entergy was unable to reschedule the biennial exercise prior to the end of CY 2020.

Conducting the RBS biennial exercise in CY 2021, rather than CY 2020, places the exercise outside of 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.

The proposed exemption is requested by December 31, 2020, in order to maintain compliance with 10 CFR 50, Appendix E. Entergy requests that the duration of the exemption be until December 31, 2022 or until the biennial exercise is performed, whichever occurs first.

A similar request has been made by Entergy for Indian Point Nuclear Generating Unit Nos. 2 and 3 in Reference 5.

No new regulatory commitments are included in this request.

If there are any questions or if additional information is needed, please contact Tim Schenk, Manager, Regulatory Assurance, River Bend Station, at (225) 381-4177.

Respectfully,

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

Ron Gaston

RWG/chm

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

Attachment to Enclosure:

RBS Emergency Response Organization Training and Drills Performed

- 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
  - 5) Entergy letter to NRC, IPEC, "One-time Scheduling Exemption Request from 10 CFR 50, Appendix E Biennial Emergency Preparedness Exercise Requirements due to COVID-19 Public Health Emergency," (ML20282A612), dated October 8, 2020
  - 6) NRC letter to Entergy, "River Bend Station, Unit 1 – Temporary Exemption from Biennial Emergency Preparedness Exercise Frequency Requirements of 10 CFR Part 50, Appendix E, Section IV.F (EPID L-2020-LLE-0163 [COVID-19])," (ML20315A345), dated November 25, 2020

cc: NRC Regional Administrator - Region IV  
NRC Project Manager – River Bend Station  
NRC Senior Resident Inspector – River Bend Station  
Louisiana Department of Environmental Quality  
Public Utility Commission of Texas

**Enclosure**

**RBG-48061**

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

**ONE-TIME SCHEDULAR EXEMPTION REQUEST FROM 10 CFR 50, APPENDIX E  
BIENNIAL EMERGENCY PREPAREDNESS EXERCISE REQUIREMENTS**

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## **ONE-TIME SCHEDULAR 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 schedular exemption for River Bend Station (RBS) from the requirement to conduct the onsite portion of 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 the listed References.

This one-time schedular exemption to allow Entergy to conduct the onsite portion of the RBS full-participation biennial EP exercise in calendar year (CY) 2021 supports continued implementation of the isolation activities (e.g., social distancing, group size limitations, self-quarantining, etc.) to protect plant personnel responsible for emergency response and safe plant operation 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 RBS 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 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 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 COVID-19 pandemic a national emergency. In addition, the State of Louisiana has declared a public health emergency and issued restrictions put in place to prevent the spread of the virus as well as measures to reduce the amount of interaction between personnel.

In response to the COVID-19 PHE, 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. Moving forward with the completion of the exercise on December 1, 2020 presented a potential health risk for participants as well as controllers and evaluators who may be exposed to COVID-19 and potentially affect their ability to perform their duties during a real-life emergency.

The RBS CY 2020 biennial emergency preparedness exercise with offsite response organization (ORO) participation was originally scheduled for June 24, 2020. Due to the impacts of COVID-19, the biennial emergency preparedness exercise was rescheduled to December 1, 2020 and a one-time scheduler exemption from the requirements of Section IV.F.2.c was obtained on November 25, 2020 to perform the exercise without ORO participation (Reference 7). This was done in an effort to complete the biennial exercise in CY 2020 and to avoid the need for an exemption from the NRC for the onsite portions of the exercise. Based on the limited amount of available time between the rescheduled date and the end of 2020, and the continued impact of the COVID-19 PHE, Entergy was unable to reschedule the biennial exercise prior to the end of 2020. Entergy has made a reasonable effort to reschedule the exercise at RBS during CY 2020 but has been unsuccessful.

### **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 Louisiana 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.

RBS's last biennial EP exercise was conducted on June 27, 2018. This exercise successfully demonstrated the capability of the OROs to respond to an event at the site. Since that time, Entergy has conducted numerous drills, exercises, and other training activities at RBS that have exercised its emergency response strategies. A list of drills, exercises, and other training opportunities that have occurred since June 2018 are tabulated and listed in the Attachment to this Enclosure.

In addition to the drills identified in the attachment, RBS also conducted Medical Drills with its health care partners in Baton Rouge, LA (Our Lady of the Lake Regional Medical Center) and in St. Francisville, LA (West Feliciana Parish Hospital), in 2018 and 2019. Staffing drills on a quarterly basis, health physics drills, and sampling drills as well as fire drills and focused area drills in the RBS Emergency Operations Facility (EOF) have been performed during this time frame as well. These elements are driven by RBS procedural guidance to ensure RBS and Entergy continue to demonstrate completion of essential elements of the RBS Emergency Plan and applicable regulatory requirements. Entergy will conduct exercises, drills and training consistent with limitations that may be prudent to address the ongoing COVID-19 PHE.

Entergy will reschedule the onsite portion of the biennial RBS EP Exercise to occur prior to May 27, 2021, which is within 35 months from the month of the previously evaluated exercise (i.e., June 27, 2018). If this exemption request is granted to allow Entergy to conduct the RBS CY 2020 biennial exercise in CY 2021, future biennial EP exercises (both onsite and offsite) will continue to be held in even years.

#### 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 RBS 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. Entergy has concluded that these measures have adequately exercised the principle functional areas of emergency response at RBS and will maintain an acceptable level of emergency preparedness during the exemption, thus satisfying the underlying purpose of the rule.

Postponing the on-site portion of the Exercise from the previously scheduled date of December 1, 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 December. 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 rescheduled date of December 1, 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, 10 CFR 50.12(a)(2) states that the NRC will not consider granting an exemption unless special circumstances are present.

Under 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 granting the exemption. Onsite personnel are currently dealing with COVID-19 in their daily duties. Participation in the biennial exercise presented a potential health risk for those concerned who may become exposed to COVID-19. Through this exposure, they could have become unable to perform their duties during a real-life emergency.

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 RBS since the last evaluated biennial EP exercise;
- Entergy's efforts to coordinate a rescheduled date that is agreeable with FEMA, NRC Region IV inspectors, the State Louisiana, and local parishes. This is documented in the NRC approval of the RBS exemption request from 10 CFR 50, Appendix E, Section IV.F.2.c. Specifically, Entergy received a one-time schedular exemption to exclude the participation of the offsite response organizations (ORO) in the biennial emergency preparedness exercise for CY 2020 (Reference 7).
- Entergy rescheduled the biennial exercise originally scheduled for June 24, 2020 to December 1, 2020 in an effort to complete the biennial exercise in CY 2020 and avoid the need for an exemption from the NRC.

## **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 RBS. 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 in CY 2020. 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 PRECEDENCE**

A similar request has been made by Entergy for Indian Point Nuclear Generating Unit Nos. 2 and 3 on October 8, 2020 (Reference 5).

## **8.0 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. Entergy letter to NRC, IPEC "One-time Scheduling Exemption Request from 10 CFR 50, Appendix E Biennial Emergency Preparedness Exercise Requirements due to COVID-19 Public Health Emergency," (ML20282A612), dated October 8, 2020
6. NRC letter to Entergy, "Updated Inspection Plan for River Bend Station (Report 05000458/2020005)," (ML20240A331), dated September 1, 2020
7. NRC letter to Entergy, "River Bend Station, Unit 1 – Temporary Exemption from Biennial Emergency Preparedness Exercise Frequency Requirements of 10 CFR Part 50, Appendix E, Section IV.F (EPID L-2020-LLE-0163 [COVID-19])," (ML20315A345), dated November 25, 2020

## **9.0 ATTACHMENTS**

RBS Emergency Response Organization Training and Drills Performed

**Enclosure, Attachment**

**RBG-48061**

**RBS Emergency Response Organization Training and Drills Performed**

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
OSC, TSC, EOF Tabletop Drill July 26, 2018	ERO Team B	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>
Full-Scale ERO Drill August 21, 2018	OSC, TSC, EOF and JIC ERO Team B Members	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
OSC, TSC, EOF, JIC Tabletop Drill September 11, 2018	ERO Team D	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, JIC and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
OSC, TSC, EOF Tabletop Drill September 18, 2018	ERO Team A	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
Full-Scale ERO Drill September 25, 2018	OSC, TSC, EOF and JIC ERO Team A and D Members, Operations Crew	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Ability of the normal staff complement to perform the functions of the on-shift ERO</li> <li>• Shift Manager has the ability to immediately and unilaterally initiate any emergency response action, including onsite and offsite assessment and protective response measures</li> <li>• Transfer command and control of the emergency response</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
Health Physics – In Plant Monitoring Drill September 25, 2018	Radiation Protection Personnel	<ul style="list-style-type: none"> <li>• Response and analysis of simulated airborne and liquid samples and direct radiation measurements in the environment</li> <li>• Availability and use of respiratory protections and protective clothing for onsite emergency response personnel</li> <li>• Contamination control practices</li> </ul>
MS-1 Medical Drill October 31, 2018	Local Hospital and Ambulance Service, East Baton Rouge Parish EOC	<ul style="list-style-type: none"> <li>• Radiological capabilities of local hospitals to treat contaminated patients</li> <li>• Setup the radiological emergency area (REA) properly</li> <li>• Properly assess, treat and decontaminated radiologically contaminated victims</li> <li>• Capability to transport a contaminated injured person</li> </ul>
Onsite Medical Drill December 6, 2018	RBS On-Shift ERO	<ul style="list-style-type: none"> <li>• Demonstrate the ability to provide first aid treatment onsite</li> <li>• Appropriate contamination controls and/or decontamination practices were employed</li> <li>• Communications between the injury scene and control room were effectively maintained</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
Accountability and Assembly Drill December 14, 2018	Full station participation	<ul style="list-style-type: none"> <li>• Demonstrate the ability to perform accountability for all individuals in the protected area within 30 minutes of declaration.</li> </ul>
OSC, TSC, EOF, JIC Tabletop Drill February 21, 2019	ERO Team C	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, JIC and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
Full-Scale ERO Drill March 12, 2019	OSC, TSC, EOF and JIC ERO Team C Members, Operations Crew	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Ability of the normal staff complement to perform the functions of the on-shift ERO</li> <li>• Shift Manager has the ability to immediately and unilaterally initiate any emergency response action, including onsite and offsite assessment and protective response measures</li> <li>• Transfer command and control of the emergency response</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
Health Physics – In Plant Monitoring Drill June 12, 2019	Radiation Protection Personnel	<ul style="list-style-type: none"> <li>• Response and analysis of simulated airborne and liquid samples and direct radiation measurements in the environment</li> <li>• Availability and use of respiratory protections and protective clothing for onsite emergency response personnel</li> <li>• Contamination control practices</li> </ul>
OSC, TSC Tabletop Drill June 18, 2019	ERO Team A	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC and TSC to support emergency response activities</li> <li>• Accident Assessment</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Protective Action Decision-making</li> </ul>
JIC Tabletop Drill June 20, 2019	ERO Team A	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the JIC to support emergency response activities</li> <li>• Public Alerting and Notification procedures</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
OSC, TSC, JIC Tabletop Drill September 12, 2019	ERO Team A, JIC Team B	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the JIC, OSC and TSC to support emergency response activities</li> <li>• Accident Assessment</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
EOF Tabletop Drill September 18, 2019	ERO Team B	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the EOF to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>
EOF Tabletop Drill September 19, 2019	ERO Team A	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the EOF to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
Full-Scale JIC Drill September 24, 2019	ERO Teams A and B	<ul style="list-style-type: none"> <li>• Joint Information Center Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
Full-Scale ERO Drill October 8, 2019	OSC, TSC, and EOF ERO Team A and B Members	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
Emergency Worker Monitoring and Decontamination Station Demonstration October 15, 2019	Port Allen Fire Department	<ul style="list-style-type: none"> <li>• Demonstrate the ability to monitor emergency worker vehicles and emergency workers to identify contamination and decontaminate as necessary</li> </ul>
MS-1 Medical Drill October 16, 2019	Local Hospital and Ambulance Service	<ul style="list-style-type: none"> <li>• Radiological capabilities of local hospitals to treat contaminated patients</li> <li>• Setup the radiological emergency area (REA) properly</li> <li>• Properly assess, treat and decontaminated radiologically contaminated victims</li> <li>• Capability to transport a contaminated injured person</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
OSC, TSC, EOF, JIC Tabletop Drill October 31, 2019	ERO Team D	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, JIC and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
Full-Scale ERO Drill November 12, 2019	OSC, TSC, EOF and JIC ERO Team D Members	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
Radiological Monitoring Drill November 13, 2019	Radiological Monitoring Team	<ul style="list-style-type: none"> <li>• 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.</li> </ul>
Health Physics – In Plant Monitoring Drill November 13, 2019	Radiation Protection Personnel	<ul style="list-style-type: none"> <li>• Response and analysis of simulated airborne and liquid samples and direct radiation measurements in the environment</li> <li>• Availability and use of respiratory protections and protective clothing for onsite emergency response personnel</li> <li>• Contamination control practices</li> </ul>
Accountability and Assembly Drill December 16, 2019	Full station participation	<ul style="list-style-type: none"> <li>• Demonstrate the ability to perform accountability for all individuals in the protected area within 30 minutes of declaration</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
Onsite Medical Drill December 17, 2019	RBS On-Shift ERO	<ul style="list-style-type: none"> <li>• Demonstrate the ability to provide first aid treatment onsite</li> <li>• Appropriate contamination controls and/or decontamination practices were employed</li> <li>• Communications between the injury scene and control room were effectively maintained</li> </ul>
OSC, TSC, EOF, JIC Tabletop Drill February 27, 2020	ERO Team D	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, JIC and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
Full-Scale ERO Drill March 10, 2020	OSC, TSC, EOF and JIC ERO Team D Members, Operations Crew	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Ability of the normal staff complement to perform the functions of the on-shift ERO</li> <li>• Shift Manager has the ability to immediately and unilaterally initiate any emergency response action, including onsite and offsite assessment and protective response measures</li> <li>• Transfer command and control of the emergency response</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
Health Physics – In Plant Monitoring Drill April 28, 2020	Radiation Protection Personnel	<ul style="list-style-type: none"> <li>• Response and analysis of simulated airborne and liquid samples and direct radiation measurements in the environment</li> <li>• Availability and use of respiratory protections and protective clothing for onsite emergency response personnel</li> <li>• Contamination control practices</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
OSC, TSC, EOF, JIC Tabletop Drill October 1, 2020	ERO Team D	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC, EOF, JIC and TSC to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>
Full-Scale ERO Drill October 13, 2020	OSC, TSC, EOF and JIC ERO Team D Members, Operations Crew	<ul style="list-style-type: none"> <li>• Accident Assessment and Classification</li> <li>• Ability of the normal staff complement to perform the functions of the on-shift ERO</li> <li>• Shift Manager has the ability to immediately and unilaterally initiate any emergency response action, including onsite and offsite assessment and protective response measures</li> <li>• Transfer command and control of the emergency response</li> <li>• Command and Control Direction and coordination of the emergency response</li> <li>• EOF, JIC, OSC, and TSC Operations</li> <li>• Public Alerting and Notification procedures</li> <li>• Radiological Monitoring and Dose Assessment</li> <li>• Protective Action Decision Making</li> <li>• Ability to augment the on-shift (on-site) response capabilities within a short period of time</li> <li>• Develop and release information to the media/public for a declared emergency</li> <li>• Activate emergency response facilities in a timely manner</li> <li>• Conduct drills which evaluate key skills, overall emergency response capabilities and formal critiques to identify weaknesses or deficiencies requiring action</li> </ul>
OSC, TSC Tabletop Drill October 15, 2020	ERO Team	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC and TSC to support emergency response activities</li> <li>• Accident Assessment</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Protective Action Decision-making</li> </ul>
JIC Tabletop Drill October 21, 2020	ERO Teams A, B, C	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the JIC to support emergency response activities</li> <li>• Public Alerting and Notification procedures</li> <li>• Develop and release information to the media/public for a declared emergency</li> </ul>

**RBS Emergency Response Organization Training and Drills Performed**

<b>Training or Evaluations</b>	<b>RBS Participation</b>	<b>Integrated Capability and Functions Tested during this Drill/Training</b>
OSC, TSC Tabletop Drill October 29, 2020	ERO Team	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC and TSC to support emergency response activities</li> <li>• Accident Assessment</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Protective Action Decision-making</li> </ul>
OSC, TSC Tabletop Drill November 16, 2020	ERO Team	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the OSC and TSC to support emergency response activities</li> <li>• Accident Assessment</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Protective Action Decision-making</li> </ul>
EOF Tabletop Drill November 18, 2020	ERO Teams C and D	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the EOF to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>
EOF Tabletop Drill November 19, 2020	ERO Team A and B	<ul style="list-style-type: none"> <li>• Demonstrate the adequacy of the EOF to support emergency response activities</li> <li>• Accident Assessment and Classification</li> <li>• Command and Control Direction and Coordination of the Emergency response</li> <li>• Public Alerting and Notification Procedures</li> <li>• Protective Action Decision-making</li> </ul>