

From: [Poole, Justin](#)
To: [Browne, Kenneth](#); [Haidul W, Meghan](#); [Greene, Joshua](#)
Cc: [Danna, James](#)
Subject: Request for Additional Information Regarding Seabrook [COVID-19] Part 73 Force-on-Force Exemption Request (L-2020-LLE-0219)
Date: Thursday, December 03, 2020 3:58:00 PM
Attachments: [L-2020-LLE-0219 RAI FOF Exemption Request.pdf](#)

Ken,

By letter dated November, 23, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20329A205), NextEra Energy (NextEra) requested an 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.(l)(1) for Seabrook Station, Unit No. 1 (Seabrook). This exemption would supersede the previously approved FOF exemption dated June 8, 2020 (ADAMS Accession No. ML20143A273) to restore compliance with 10 CFR Part 73, Appendix B, and the Seabrook Training and Qualification Plan 90 days after the public health emergency (PHE) has ended or prior to December 31, 2020, whichever occurred first. In reviewing the submitted information, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is necessary to complete its review.

On December 3, 2020, the NRC staff sent NextEra the DRAFT RAI to ensure that the question is understandable, the regulatory basis is clear, there is no proprietary information contained in the RAI, and to determine if the information was previously docketed. On December 3, 2020, the NRC and NextEra held a clarifying call. During the call, NextEra requested a response date of December 9, 2020. The NRC staff informed NextEra that this timeframe is acceptable. The attached is the final version of the RAIs. These RAIs will be put in ADAMS as a publicly available document.

Justin C. Poole
Project Manager
NRR/DORL/LPL I
U.S. Nuclear Regulatory Commission
(301)415-2048

REQUEST FOR ADDITIONAL INFORMATION

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

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

By letter dated November, 23, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20329A205), NextEra Energy (NextEra) requested an 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 Seabrook Station, Unit No. 1 (Seabrook). This exemption would supersede the previously approved FOF exemption dated June 8, 2020 (ADAMS Accession No. ML20143A273) to restore compliance with 10 CFR Part 73, Appendix B, and the Seabrook Training and Qualification Plan 90 days after the public health emergency (PHE) has ended or prior to December 31, 2020, whichever occurred first. Subsection C.3.(I)(1) requires that:

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.

NextEra stated that the PHE has not ended and continues to impact Seabrook's ability to conduct annual FOF exercises. Approval 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.

Issue

On October 13, 2020, the NRC issued updated guidance for licensees that require exemptions from calendar year (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 fuel cycle facility

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.

Request

1. Provide information on the site-specific condition(s), including site-specific COVID-19-related impacts, that will prevent Seabrook from completing its CY 2020 annual FOF exercise prior to December 31, 2020.