



December 08, 2020

NRC 2020-0044

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Point Beach Nuclear Plant, Units 1 and 2  
Dockets 50-266 and 50-301  
Renewed License Nos. DPR-24 and DPR-27

Response to Request for Additional Information  
Request for Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1)  
Regarding Annual Force-On-Force Exercise

Reference:

1. NextEra Energy Point Beach, LLC letter "Request for a One-Time Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force-on-Force (FOF) Exercises, Due to COVID 19 Pandemic", November 19, 2020 (ML20324A693 non-public).
2. NRC "Request for Additional Information Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force-on-Force (FOF) Exercises, Due to COVID 19 Pandemic", December 03, 2020 (ML20339A003).

In Reference 1, NextEra Energy Point Beach, LLC (NextEra) requested a One-Time Exemption from 10 CFR 73, Appendix B, Section VI, Subsection C.3.(I)(1) Regarding Annual Force-on-Force (FOF) Exercises, Due to COVID 19 Pandemic. This exemption would supersede the previously approved FOF exemption dated June 15, 2020 (ADAMS Accession No. ML20153A011) to restore compliance with 10 CFR Part 73, Appendix B, and the Point Beach Training and Qualification Plan 90 days after the public health emergency (PHE) has ended or prior to December 31, 2020, whichever occurred first.

In Reference 2, the NRC requested additional information to complete the review of the 10 CFR 73, Appendix B, Section VI, subsection C.3.(I)(1) exemption request.

The enclosure to this letter provides NextEra's response to the request for additional information.

This letter contains no new regulatory commitments.

Should you have any questions regarding this submission, please contact Ms. Kim Locke, Principal Licensing Analyst, at 920-755-7655.

Sincerely,



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Eric Schultz  
Licensing Manager  
NextEra Energy Point Beach, LLC

Enclosure – Response to Request for Additional Information

## ENCLOSURE

### RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

#### REQUEST FOR EXEMPTION FROM 10 CFR 73, APPENDIX B, SECTION VI,

#### SUBSECTION C.3.(I)(1) REGARDING ANNUAL FORCE-ON-FORCE EXERCISE

#### NEXTERA ENERGY POINT BEACH, LLC POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

#### DOCKET NOS. 50 266 AND 50 301

By letter dated November 19, 2020 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML20324A693, non-public), NextEra Energy Point Beach, LLC. (NextEra) submitted an one-time exemption request to the Nuclear Regulatory Commission (NRC), regarding the 2020 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 Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). This exemption would supersede the previously approved exemption dated June 15, 2020 (ADAMS Accession No. ML20153A011) requirement to complete the 2020 annual FOF exercises, as required by 10 CFR Part 73, Appendix B, Section VI, Subsection C.3.(I)(1), within 90 days after the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) has ended, or by December 31, 2020, whichever occurred first.

The NRC staff has reviewed the submittal and determined that additional information is needed to complete its review.

#### **NRC RAI #1**

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

#### **NextEra Response:**

The threat of the Coronavirus Disease 2019 (COVID-19) spread has resulted in the inability to safely conduct the annual force on force (FOF) exercise at Point Beach within calendar year (CY) 2020 as required by Title 10 of the Code of Federal Regulations (CFR) Part 73, Appendix B, Section VI, subsection C.3.(I)(1). As noted by the Centers for Disease Control and Prevention (CDC), COVID-19 may spread between people who are in close contact with one another (within 6 feet), through respiratory droplets produced when an infected person coughs, breathes, sings, or talks, by airborne transmission under certain circumstances (e.g. enclosed spaces with poor ventilation) or by individuals who are infected but do not have symptoms.

Performance of FOF exercises requires significant site resources that will result in exposing multiple individuals to conditions of close contact with others. Those scenarios

would conflict with CDC guidance and NextEra policy for maintaining separation of 6 feet between personnel, and many of these situations would also be in enclosed areas. Areas where public health measures cannot be followed due to the performance of an FOF exercise would be the inside of bullet resistant enclosures and alarm stations as they do not provide adequate social distancing capability for the increased FOF staffing.

The annual FOF exercises require approximately 75% of the security staff to be onsite and within close proximity during the exercise. In addition, there is a potential for security staff exposure risks as Point Beach security staff is required to participate in the exercise, briefings, and critiques.

Modifications to the drill and exercise program to accommodate the PHE, State, and NextEra Guidelines would jeopardize the effectiveness of the safety protocols in place to run a full-scale FOF exercise in accordance with station procedures and regulatory guidelines.

Continued implementation of public health measures (for example, social distancing, group size limitations, remote working, etc.) taken at Point Beach remain necessary to protect the health and safety of essential site personnel during the COVID-19 public health emergency (PHE). Participation in the annual FOF exercise with the current, rapidly increasing rate of COVID-19 infections in the towns and communities surrounding Point Beach in eastern Wisconsin, (See References below), exposes additional COVID-19 risk to Security, as well as site personnel that are necessary to participate in the FOF exercise.

#### References:

Centers for Disease Control and Prevention, How to Protect Yourself and Others; retrieved from <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/prevention.html#:~:text=%2D%20Some%20people%20without%20symptoms,%20from%20other%20people>, Accessed December 04, 2020.

Wisconsin COVID-19 Coronavirus Information, Executive and Emergency Orders; retrieved from <https://govstatus.egov.com/wi-covid-19>, Accessed December 04, 2020.

Manitowoc County, Wisconsin, Critical Information Regarding the Coronavirus (COVID-19); retrieved from <https://www.co.manitowoc.wi.us/departments/health-department/covid-19-information/> Accessed December 04, 2020.

Brown County, Wisconsin, COVID-19 Dashboard and Data; retrieved from <https://www.browncountywi.gov/community/covid-19/dashboard-data/> Accessed December 07, 2020.