

From: [Andrea Sterdis](#)
To: [Snyder, Amy](#)
Cc: [Dave Noyes](#)
Subject: [External_Sender] Supplemental Information to Support 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
Date: Thursday, December 10, 2020 11:17:08 AM

December 10, 2020

HDI-PIL-20-092

10 CFR 73.5

Attn: U.S. Nuclear Regulatory Commission, Project Manager, NMSS – Pilgrim Nuclear Power Station

Pilgrim Nuclear Power Station
Renewed Facility License No. DPR-35
NRC Docket No. 50-293 and 72-1044

Subject: Supplemental Information to Support 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

Reference: 1. Letter from Andrea L. Sterdis (Holtec Decommissioning International) to U.S. Nuclear Regulatory Commission, "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 20, 2020 (ML20325A342)

By letter dated November 20, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20325A342), Holtec Decommissioning International, LLC (HDI) requested an exemption from Title 10 of the Code of Federal Regulations (10 CFR) Part 73, Appendix B, Section VI, subsection C.3.(I)(1), regarding the annual force-on-force (FOF) exercises for calendar year 2020 at Pilgrim Nuclear Power Station (PNPS).

The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the request and has determined that additional information is needed to complete its review.

This letter provides the additional information to support why Pilgrim Nuclear Power Station (PNPS) is unable to conduct the calendar year 2020 FOF exercises due to the continuing COVID-19 Public Health Emergency (PHE) and Commonwealth of Massachusetts emergency declaration.

PNPS is unable to conduct the 2020 CY FOF exercises due to: Holtec infectious disease transmission prevention strategies, Commonwealth of Massachusetts restrictions, and CDC recommendations. Specifically, drill and exercise evolutions require three teams, along with personnel from other sites, to be onsite and within close proximity during briefings, conduct of the drills, and critiques. Examples of individuals in close proximity are personnel collocated in Bullet Resistant Enclosures (BREs) and Alarm Stations that do not lend themselves to adequate social distancing for the on-duty officer, drill play officer, and the controller.

This letter contains no new regulatory commitments.

Should you have any questions or require further information, please contact me at (856) 797-0900, x3813.

Respectfully,

Andrea L. Sterdis

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