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December 10, 2020

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: NRC Licensing Project Manager Michael Balazik/Document Control Desk

Reference: Oregon State University TRIGA Reactor (OSTR)
Docket No. 50-243, License No. R-106
Extension Request Letter dated November 3, 2020

Subject: Extension of Timeframe required to Complete Biennial Emergency Exercise
per Oregon State TRIGA Reactor Emergency Response Plan, Facility
Operating License No. R-106

This letter serves as a supplement to the extension request letter dated November 3, 2020.

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 in the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19). Because of the COVID-19 public health emergency (PHE), the Oregon State TRIGA Reactor (OSTR) hereby submits an exemption request for its Facility Operating License No. R-106 from certain biennial emergency plan exercise requirements that are specified in the OSTR Emergency Plan Section 10.2. The requested exemption is for a temporary deviation from the listed frequency of required biennial emergency exercise performance; specifically, OSTR is requesting a one-time deviation from 10 CFR 50 Appendix E IV.F.2(b), specifically the 30-month time interval between biennial emergency exercises, as described in the OSTR emergency response plan, to a 35-month interval between exercises (not to exceed August 1, 2021), as allowed per Regulatory Issue Summary (RIS) 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements" dated February 24, 2006. The reason for this deviation, as discussed in the following analysis, is to ensure that OSTR engages in activities that do not conflict with practices recommended by the Centers for Disease Control and Prevention to limit the spread of COVID-19.

As a result of the COVID-19 pandemic, the social distancing mandate that has been established by the Center for Disease Control (CDC) and the State of Oregon prevents the ability to conduct an emergency exercise with offsite authorities by the required date of 03/20/2021. Therefore, we are requesting exceptions from:

- The specific portion of 10 CFR 50 App. E IV.F.2(b) that requires deviation is as follows: each licensee at each site shall conduct a subsequent exercise of its onsite emergency plan every 2 years.
- The specific portion of the Emergency Plan that requires a deviation is Section 10.2.c "Emergency Drills: "Biennially, these drills will contain provisions for coordination with offsite emergency personnel and will test, as a minimum, the communication links and notification procedures with these offsite agencies and support organizations." Additionally, for clarification, section 2.0 of the Emergency Plan lists a definition for biennially that reads, "Every 24 months, with an interval not exceeding 30 months".

The last biennial emergency drill involving offsite organizations was conducted on September 20, 2018. The scenario for this emergency drill was a simulation of a contaminated employee falling from the reactor top, which involved the Corvallis Fire Department and the Emergency Department from Good Samaritan Regional Medical Center. There were no significant gaps or areas for improvement identified during this drill. The last annual emergency exercise was conducted on October 11, 2019. The scenario for this exercise was response to a continuously rising CAM alarm due to a simulated fuel leak, in conjunction with a contaminated SRO on the reactor top. There were no significant deficiencies identified.

By submitting this exemption request, the OSTR is proactively taking steps to implement interim actions during the deviation period that supports the health and safety of both worker and medical personnel to limit the spread of the COVID-19 virus. The interim actions (in accordance with the May 14, 2020 COVID EP NRC Letter sent from H. Nieh to NEI, "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" are as follows:

1. Follow the recommendation of scheduling an exercise within the 35-month window as described in the Regulatory Issue Summary (RIS) 2006-03, "guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements" dated February 24, 2006. This exercise will be coordinated with offsite response organizations, as appropriate. Future exercises will be held as scheduled.
2. Conduct a tabletop emergency exercise with internal OSTR personnel via a videoconference platform prior to December 30, 2020. This exercise was held on December 9, 2020.

This request is being made to support OSTR efforts to maintain CDC recommendations related to social distancing, worker screening, and limiting close-proximity work. OSTR

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staff understands that if this proposed exemption request is approved, the biennial emergency exercise must be performed as soon as practical and within the 35-month window from the last performed exercise, as specified in RIS 006-03 (the next exercise is to be performed prior to August 1, 2021).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 12/10/20

Sincerely,



Dr. Steven Reese
Director