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Cc: richard.e.hanson@dominionenergy.com
Subject: Response to North Anna Hardship (Temporary Staff Guidance – Additional Guidance for FOF Inspections During the PHE)
Date: Thursday, May 20, 2021 3:06:00 PM

Dear Mr. Hayden,

The U.S. Nuclear Regulatory Commission (NRC) developed the Temporary Staff Guidance (TSG) TSG-NSIR-2021-01, “Additional Guidance for Force-on-Force Inspections During the Public Health Emergency” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21043A259), criteria to evaluate if there is an unreasonable burden on the licensee’s ability to staff positions required for conduct of Inspection Procedure (IP) 71130.03, “Contingency Response Force-on-Force Testing,” during the Coronavirus Disease of 2019 (COVID-19) Public Health Emergency (PHE). The NRC plans to use IP 71130.03 with Addendum 5 (ADAMS Accession No. ML21012A329), which provides interim guidance related to the implementation of Inspection Procedure 71130.03 during the COVID-19 PHE; however, when conditions do not permit use of IP 71130.03, due to hardship, the NRC would use revised IP 92707, “Security Inspection of Facilities Impacted by a Local, State, or Federal Emergency Where the NRC’s Ability to Conduct Triennial Force-on-Force is Limited” (ADAMS Accession No. ML21019A452).

The NRC staff reviewed the hardship information provided in your email dated 5/19/21, as well as the further the discussions that you had with the inspection team on-site on 5/20/21, and the team lead recommended based on the information presented to conduct the Exercise Week utilizing the revised IP 92707. After reviewing the information and considering the team lead’s recommendation, the request for hardship for the conditions “that the use of certain positions would create an undue burden on the licensee and conflict with site protocols” is approved. The NRC determined that the scenario developed during Planning Week cannot successfully be conducted within the objectives of the IP 71130.03 (with Addendum 5) to mitigate COVID impacts, thus the NRC will conduct the revised IP 92707 inspection during the scheduled Exercise Week (week of June 7th).

Please feel free to contact me at (301) 807-2928 or Terrence Barry, the inspection team lead, at (301) 287-3617 with any questions you have regarding this.

Thanks,

Josh

Joshua K. Berry

Team Leader

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