



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 27, 2021

Mr. Kenneth Ohr, Site Vice President
Quad Cities Nuclear Power Station
22710 206th Ave. North
Cordova, IL 61242

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO EXELON
GENERATION COMPANY, LLC QUAD CITIES NUCLEAR POWER STATION,
UNITS 1 AND 2, 2021 FORCE-ON-FORCE HARDSHIP REQUEST

Dear Mr. Ohr:

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 letter, "Quad Cities Nuclear Power Station 2021 Force-on-Force Inspection," dated May 20, 2021 (ADAMS Accession No. ML21140A141), and has initially disapproved the request for hardship for the conditions identified, "that the use of certain positions would create an undue burden on the licensee and conflict with site protocols." It is important to clarify that the NRC's intent is that the use of this criterion as described in the TSG is predicated on the outcome from the site-specific scenario development discussions during the planning week of the inspection. This was described in further detail and depicted in a flowchart during the NRC Public Meeting held on May 10, 2021. The NRC staff will retain the Quad Cities Nuclear Power Station request for hardship letter to consider its applicability during the planning week activities. If the NRC determines 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, the NRC will conduct the revised IP 92707 inspection during the scheduled Exercise Week. In addition, should the stated hardship conditions described in the letter change, the NRC staff encourages the licensee to resubmit the request for hardship letter with updates and to continue communicating site conditions with the NRC inspection team in advance of scheduled onsite activities to facilitate optimal measures to protect the safety and wellbeing of all participants.

Please feel free to contact me at (301) 287-3666 or Terrence Barry, the inspection team lead, at (301) 287-3617 with any questions you have regarding this response or the TSG.

Sincerely,

A handwritten signature in cursive script that reads "Joshua K. Berry".

Signed by Berry, Joshua
on 05/27/21

Joshua Berry, Acting Chief
Security Performance and Evaluation Branch
Division of Security Operations

Docket Nos.: 05000254 and 05000265

cc: John Giessner, RIII RA
Sabrina Attack, NSIR DSO
Booma Venkataraman, NRR/DORL
C. Hunt, SRI

NRC Response to Quad Cities Request for Hardship DATE May 27, 2021

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JBerry, NSIR/DSO/SPEB/ETB

ADAMS Accession No.: Ltr ML21145A102

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DATE	May 27, 2021	May 27, 2021		

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