

**From:** [Patterson, Charles](#)  
**To:** [Tiktinsky, David](#)  
**Cc:** [Siurano-Perez, Osiris](#); [Vukovinsky, Thomas](#); [Michel, Eric C.](#); [Patterson, Charles](#); [Sanders, Robert](#)  
**Subject:** [External\_Sender] RE: [External] Exercise exemption request follow-up  
**Date:** Friday, July 09, 2021 1:16:02 PM  
**Attachments:** [MTW Reponses to the NRC email - from 6-29-21 - Final-Rev B 20210709.pdf](#)

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David,

See the attached answers to the questions related to the Exercise exemption.

Contact me with any additional comments, questions, or clarifications.

Regards,

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**From:** Tiktinsky, David <David.Tiktinsky@nrc.gov>  
**Sent:** Tuesday, June 29, 2021 12:16 PM  
**To:** Patterson, Charles <Sean.Patterson@Honeywell.com>  
**Cc:** Siurano-Perez, Osiris <Osiris.Siurano-Perez@nrc.gov>; Vukovinsky, Thomas <Thomas.Vukovinsky@nrc.gov>; Michel, Eric C. <Eric.Michel@nrc.gov>  
**Subject:** [External] Exercise exemption request follow-up

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We met with the OGC lawyers that are reviewing the exemption request. They agreed that it is ok for you to go to an even year schedule after the deferred 2022 exercise (assuming granting of the exemption). They had the following questions that they wanted me to ask:

- a. The request dated April 30<sup>th</sup> cited conflicts with CDC guidance. The CDC has provided fairly substantial updates to its guidance in the intervening month and a half. Please describe how the performance of this exercise still conflicts with the guidance under the current guidelines?  
**Here's a link to the CDC guidance:** <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html>
- b. Please provide a detailed discussion of the activities that MTW will still be performing related to EP during the deferred EP time period (e.g., drills, exercises, etc.)

Please let me know how long it will take to provide this additional information. Thanks.

## Response to NRC email Questions

Metropolis works (MTW) has prepared the following responses to NRC questions regarding the Metropolis Works (MTW) request for an exemption related to the performance of the MTW graded drill for calendar year 2021. The following provides the NRC question and following the question is the MTW response:

**NRC Question:** The request dated April 30<sup>th</sup> cited conflicts with CDC guidance. The CDC has provided fairly substantial updates to its guidance in the intervening month and a half. Please describe how the performance of this exercise still conflicts with the guidance under the current guidelines? Here's a link to the CDC guidance: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html>

**MTW Response:** The current CDC guidance as described in the link to the CDC site listed above, states that fully vaccinated individuals are free to participate in most activities without social distancing or wearing face coverings. MTW is located in the state of Illinois and current guidance in the state requires that persons that are not vaccinated must wear masks and social distance. Under the HIPAA regulations MTW is prohibited from requesting information about the status of vaccinations for the first responders from outside agencies. The current Honeywell requirements for persons entering the MTW site is the same as the current Illinois requirements. Since MTW is still in an idle state MTW would have to request that outside agencies play a key role in the graded exercise, and maintain social distancing and wear face coverings during the exercise. This would add risk to Honeywell employees and diminish the effectiveness of the exercise.

Although the CDC and the Illinois Department of Public Health (IDPH) are currently aligned with regards to the guidance described above, region 5 of Illinois, which encompasses the southern twenty counties, including Massac County, has seen a 206% increase in the COVID-19 test positivity rate from June 26<sup>th</sup> thru July 5<sup>th</sup>. Should case positivity rates continue the current trend, IDPH may elect to implement additional community mitigation interventions for the region to control the further spread of COVID-19.

MTW is still requesting an exemption from the 2021 graded drill due to the above discussion. MTW anticipates the conditions would be more favorable and allow MTW to conduct a graded drill in the spring or early summer of 2022.

**NRC Question:** Please provide a detailed discussion of the activities that MTW will still be performing related to EP during the deferred EP time period (e.g., drills, exercises, etc.)

**MTW Response:** MTW is performing internal ERP activities commensurate with the idle state status as listed below:

1. Monthly Siren Tests – onsite and offsite.
2. Emergency communication equipment functional tests.
3. Census Drills – These drills test the time it takes for MTW employees and contractors to report to designated muster locations.
4. AED Drills – These drills test that an AED is available at the site of a medical emergency within five minutes.
5. Confined space rescue training/drills.
6. Patient packaging and high angle rescue training/drills.
7. First Aid/CPR/AED training/drills.
8. Transient combustible audits
9. Monthly Fire extinguisher inspections