



Jaime H. McCoy
Site Vice President

July 29, 2021
WO 21-0027

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

- Reference:
- 1) NRC letter dated May 14, 2020, "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," [ML20120A003]
 - 2) NRC letter dated November 10, 2020, "U. S. Nuclear Regulatory Commission Updated Planned Actions Related to Certain Requirements for Operating and Decommissioning Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency" [ML20261H515]

Subject: Docket No. 50-482: One-Time Request for Exemption from the Biennial Emergency Preparedness

Commissioners and Staff:

In accordance with 10 CFR 50.12, Wolf Creek Nuclear Operating Corporation (WCNOC) hereby submits the enclosed request for a one-time exemption from certain 10 CFR 50, Appendix E requirements regarding biennial emergency preparedness exercises at Wolf Creek Generating Station (WCGS) due to the Coronavirus Disease 2019 (COVID-19) pandemic.

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency for the United States to aid the nation's healthcare community in responding to the COVID-19 pandemic. On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization and, on March 13, 2020, President Donald Trump declared the COVID-19 pandemic a national emergency.

In response to the declarations, WCNOC in order to maintain a healthy work force, implemented practices recommended by the Centers for Disease Control and Prevention (CDC) to limit the spread of COVID-19 by implementing strict isolation protocols (e.g., social distancing, group size limitations, self-quarantining, etc.) and work-from-home requirements at WCNOC. In addition, ongoing efforts to vaccinate the population have further limited the availability of offsite resources needed to adequately schedule, perform, and evaluate the required biennial exercises. Offsite response organizations (ORO) have requested and received relief from the frequency requirement to conduct the biennial radiological emergency preparedness exercise for WCGS.

In accordance with the provisions of 10 CFR 50.12, "Specific exemptions," paragraph (a)(2)(v), WCNO requests a temporary exemption from the requirements of 10 CFR Appendix E, Sections IV.F.2.b. and IV.F.2.c., as meeting these requirements would conflict with the isolation practices recommended by the CDC. Specifically, WCNO requests a one-time exemption to postpone the joint, full participation biennial emergency preparedness exercise until calendar year (CY) 2022.

WCGS will conduct the CY 2022 exercise within 35 months from the performance of the previous full-participation exercise conducted on December 3, 2019.

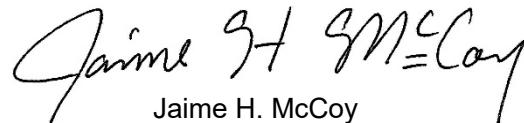
If exemptions are granted to allow the CY 2021 exercise to be conducted in CY 2022, future biennial exercises will continue to be held in odd years, beginning in CY 2023.

The attached request provides justification for the one-time exemption.

WCNO requests approval by August 31, 2021.

This letter contains no new commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204, or Ron Benham at (620) 364-4204.

Sincerely,



Jaime H. McCoy

JHM/rlt

Attachment: WCGS 2021 Biennial Emergency Preparedness Exercise Exemption Request

- Enclosures:
- I. FEMA Request for Exemption Letter from: Chad Gorman
Acting Assistant Administrator, National Preparedness Directorate
 - II. FEMA Approval of Relief Request for Exemption Letter from: Kathy Fields
Acting Regional Administrator, FEMA Region IV
 - III. ORO Letter of support from: Kimberly Steves
Director, Radiation Control Program
Kansas Department of Health and Environment
 - IV. ORO Letter of Support from: Jonathan York
Response & Recovery Branch Director
Kansas Division of Emergency Management
 - V. ORO Letter of Support from: Carl Lee
Director Coffey County Emergency Management

cc: S. S. Lee (NRC), w/a, w/e
S. A. Morris (NRC), w/a, w/e
N. O'Keefe (NRC), w/a, w/e
Senior Emergency Preparedness Inspector (NRC), w/a, w/e
Senior Resident Inspector (NRC), w/a, w/e

WCGS 2021 Biennial Emergency Preparedness Exercise Exemption Request

1.0 SUMMARY DESCRIPTION

In accordance with 10 CFR 50.12, "Specific exemptions," Wolf Creek Nuclear Operating Corporation (WCNOC) requests a one-time schedular exemption for Wolf Creek Generating Station (WCGS) from the requirement to conduct onsite and offsite full-participation biennial emergency preparedness (EP) exercises specified in 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," sections IV.F.2.b and IV.F.2.c. This one-time exemption is in response to the isolation activities (e.g., social distancing, group size limitations, self-quarantining) that have been necessary to protect required WCGS site personnel in response to the Coronavirus Disease 2019 (COVID-19) pandemic. These restrictions were needed to protect plant personnel responsible for emergency response and safe plant operation.

This one-time exemption also serves to protect supporting state and local government emergency management personnel and federal evaluators from transmission of the COVID-19 virus to ensure they remain capable of executing their emergency response functions in the event of an actual WCGS emergency or in response to other non-nuclear health and safety functions for the broader benefit of the public, including the current efforts to vaccinate the public against the COVID-19 virus.

As a result of discussions between WCGS, State and local officials, the Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA), WCNOC has concluded that scheduling the biennial exercise in calendar year (CY) 2021 would not be reasonable during the current COVID-19 public health emergency (PHE). Upon exemption approval, WCNOC will continue to support the isolation protocols necessary to protect essential site personnel during the transition period to normal operations. WCNOC continues to coordinate with responsible organizations to schedule onsite and offsite emergency preparedness exercises during the summer of 2022 – an exercise date has been tentatively proposed for June-August 2022. WCGS will continue to coordinate an acceptable time with NRC, FEMA and affected offsite response organizations (ORO).

2.0 BACKGROUND

10 CFR 50, Appendix E, Section IV.F.2.b states in part:

Each licensee at each site shall conduct a subsequent exercise of its onsite emergency plan every 2 years.

10 CFR 60, Appendix E, Section IV.F.2.c. states in part:

Offsite plans for each site shall be exercised biennially with full participation by each offsite authority having a role under the radiological response plan. Where the offsite authority has a role under a radiological response plan for more than one site, it shall fully participate in one exercise every two years and shall, at least, partially participate in other offsite plan exercises in this period.

On January 31, 2020, the U.S. Department of Health and Human Services declared a PHE for the United States to aid the nation's healthcare community in responding to the COVID-19 pandemic. On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization and, on March 13, 2020, President Donald Trump declared the COVID-19 pandemic a national emergency. WCNOC implemented isolation restrictions for site personnel on March 16, 2020.

In response to the PHE, the NRC issued a letter May 14, 2020, *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* [ML20120A003] (Reference 1). This letter provided information regarding licensee requests for exemptions from certain parts of 10 CFR 50, Appendix E, Section IV requirements during the COVID-19 PHE, and the process that the NRC planned to use when reviewing such requests.

The NRC issued a letter dated November 10, 2020, titled, *U.S. Nuclear Regulatory Commission Updated Planned Actions Related to Certain Requirements for Operating and Decommissioning Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency* (Reference 2). This letter provides guidance on the continued use of expedited processes needed for submitting exemption requests beyond December 31, 2020. Enclosure 6 of this letter, titled, *Title 10 of the Code of Federal Regulations (10 CFR) Emergency Plan Requirements*, further describes the exemption process for licensees with 2021 exercise dates that need to seek exemptions from the biennial exercise requirements in 10 CFR Part 50, Appendix E, Section IV.

Because of the COVID-19 PHE, WCNO has determined that an exemption is needed from the biennial emergency plan exercise requirements specified in 10 CFR 50, Appendix E, Section IV.F.2.b. and IV.F.2.c., as meeting these requirements would conflict with practices recommended by the CDC, KDHE and WCNO's pandemic response plan to limit the spread of COVID-19. In order to fulfill the exercise requirements of Section IV.F.2.b., WCGS would need to staff emergency facilities in a manner that would compromise current social distancing best practices. This would occur in multiple locations and unnecessarily increase the risk of exposure to personnel responsible for safe plant operation and emergency response.

Additionally, required OROs have determined conducting an exercise during 2021 to fulfill 10 CFR 50, Appendix E, Section IV.F.2.c. would compromise social distancing practices and would be inconsistent with pandemic response protocols for The State of Kansas. Coffey County emergency responders and KDHE are leading COVID-19 vaccination distribution efforts for the area. Redirecting the personnel needed to perform an exercise during this ongoing vaccination effort is not feasible with limited rural county staffing and would jeopardize the prioritization off the health and welfare of their community members.

3.0 TECHNICAL JUSTIFICATION OF ACCEPTABILITY

WCNO along with state and local emergency management organizations have implemented isolation activities recommended by the CDC such as social distancing, group size limitations and self- quarantining to limit the spread of the COVID-19 virus through 2020 and 2021. These restrictions have been necessary to protect plant personnel and off-site personnel needed for emergency response. While these restrictions continue to roll back as vaccination rates improve, significant preparation and development time have been lost while focusing resources and efforts battling the COVID-19 pandemic.

WCNO provides the following information in support of an expedited review per the references in Section 7.0:

- Regulatory basis for the exemption;
 - Per 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption unless special circumstances are present. Under 10 CFR 50.12(a)(2)(v), special circumstances include when the exemption would provide only temporary relief from the applicable regulation. The requested exemption to not conduct the biennial exercise in CY 2021 would provide only temporary relief from the applicable regulations.

- The last biennial exercise date;
 - The last WCNOc biennial exercise was conducted on December 3, 2019
- Current biennial exercise scheduled date;
 - November 16, 2021
- A statement the licensee has made a reasonable effort to reschedule the exercise during CY 2021, but was unsuccessful;
 - WCNOc has been in communication with NRC Region IV, FEMA Region VII, the state of Kansas and the local offsite organizations concerning availability and exercise preparation. The isolation protocols have only recently started to relax at WCGS and remain in place at the offsite agencies.
 - FEMA has provided WCGS's OROs with relief from participation in the 2021 biennial exercise and has been awarded partial Real World Credit for their efforts in pandemic response.
 - Letters from offsite agencies in support of rescheduling the biennial exercise to a 2022 date are attached to this request.
- A statement the rescheduled biennial exercise will be conducted within 35 months from the month in which the previously evaluated exercise was conducted in CY 2019;
 - The next full participation exercise is tentatively scheduled for summer, 2022. WCGS will work with the State, local OROs, FEMA and NRC Region IV to ensure the finalized exercise date is within 35 months of the December 2019 date of the last evaluated exercise.
- A statement that if an exemption is granted to allow WCGS to conduct the exercise in CY 2022, that future biennial exercises will continue to be held in odd years;
 - WCGS will continue to hold both onsite and offsite exercises in odd years. The 2023 full participation biennial exercise is currently scheduled November 14, 2023.
- A statement that WCGS has conducted drills, exercises, and other training activities that exercised its emergency response strategies, in coordination with offsite authorities, since the previous biennial exercise;
 - Since the last biennial EP exercise on December, 2019, WCNOc has conducted numerous drills, exercises, and other training activities that have exercised the emergency response strategies and demonstrated proficiency. State and local agencies have participated at various levels in these activities, exercising various EP program elements during the following months:
 - June 2020
 - August 2020
 - September 2020
 - October 2020
 - March 2021
 - June 2021

Activities conducted since March 2020 involve various levels of staffing due to COVID-19 protocols.

WCGS will continue to conduct drills, tabletops, and other training activities that exercise the emergency response plan and demonstrate proficiency to the extent reasonable during the PHE. The associated OROs will continue to maintain their current emergency plans and ability to respond to an actual emergency during the pandemic. These state and local authorities will participate in limited-scope drills

and training activities to the extent practical while also complying with the CDC isolation activity recommendations to limit the spread of COVID-19. The extension afforded by an exemption would not hinder the ability to respond should an actual emergency occur.

- A statement that the rescheduled biennial exercise has been, or will be, coordinated with the applicable offsite response organizations, NRC Region, and the applicable FEMA Region;
 - The tentative summer, 2022 date for the next full participation exercise has been discussed with the OROs, NRC and FEMA. WCNO will continue to coordinate with those organizations concerning the scheduling and logistics of the 2022 biennial exercise.
- A statement from responsible OROs that they agree with the exemption request and they are committed to maintaining their radiological emergency plans;
 - The OROs agree with WCNO's exemption request and are committed to maintaining their radiological emergency plans. Enclosed with this attachment are letters from Coffey County, KDHE, and KDEM in support of the exemption.
- A statement from the responsible OROs that they are not impacted in a manner that would adversely affect their ability to maintain response capability to support emergency response activities to actual nuclear power plant radiological emergencies.
 - As described in the enclosed letters, the OROs continue to work closely with WCNO and the state to maintain response capabilities in the event of an actual emergency at WCGS.

4.0 JUSTIFICATION OF EXEMPTION

10 CFR 50.12, "Specific exemptions," states that the NRC may grant exemptions from the requirements of the regulations provided three conditions are met:

- (1) The exemptions are authorized by law.
- (2) The exemptions will not present an undue risk to the public health and safety, and
- (3) The exemptions are consistent with the common defense and security.

WCGS has evaluated the requested exemption against the criteria of 10 CFR 50.12 and determined the criteria are satisfied as described below.

1. This exemption is authorized by law

The biennial emergency preparedness exercise specified in 10 CFR 50, Appendix E, Sections IV.F.2.b and IV.F.2.c is not required by any statute. The requested exemption is authorized by law in that no law precludes the activities covered by this exemption request. Granting of the request does not result in a violation of the Atomic Energy Act of 1954, as amended.

2. This exemption will not present an undue risk to the public health and safety

The regulations in 10 CFR Part 50, Appendix E, Section IV.F.2.b and Section IV.F.2.c, concern requirements for licensees to conduct biennial EP exercises at their facilities. No new accident precursors are created by allowing WCNO to postpone the biennial EP exercise from CY 2021 to CY 2022. Thus, the probability and consequences of postulated accidents are not increased. Therefore, the requested exemption will not present an undue risk to the public health and safety.

3. This exemption is consistent with the common defense and security

This requested exemption for a one-time change to the biennial EP exercise schedule has no relation to security issues. Therefore, the requested exemption is consistent with the common defense and security.

5.0 CONCLUSION

As demonstrated above, WCNOc considers this exemption request to be in accordance with the criteria of 10 CFR 50.12. Specifically, the requested exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. A temporary exemption from the biennial EP exercise requirements of 10 CFR 50, Appendix E, Section IV.F.2.b and IV.F.2.c due to the COVID-19 PHE is therefore warranted.

6.0 ENVIRONMENTAL ASSESSMENT

WCNOc is requesting a one-time schedular exemption from the requirements of 10 CFR 50, Appendix E, Sections IV.F.2.b and IV.F.2.c for conducting biennial EP exercises. The following information is provided in support of a determination that no environmental assessment or an environmental impact statement is required in accordance with 10 CFR 51.22(b) and 10 CFR 51.22(c)(25) to grant the requested exemption.

The exemption does not make any changes to the facility or operating procedures and does not:

- a) involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), in that it does not:
 - alter the design, function or operation of any plant equipment. Therefore, granting this exemption would not increase the probability or consequence of any evaluated accident.
 - create any new accident initiators. Therefore, granting this exemption does not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - exceed or alter a design basis or safety limit. Therefore, granting this exemption does not involve a significant reduction in a margin of safety.

Therefore, a finding of “no significant hazards considerations” is justified.

- b) involve any changes that would introduce any change to effluent types, affect any plant radiological or non-radiological effluent release quantities, or affect any effluent release paths or the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed exemption does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.
- c) affect any plant radiation zones, nor change any controls required under 10 CFR Part 20 that preclude a significant increase in occupational radiation exposure. Therefore, it is concluded that the proposed exemption does not involve a significant increase in individual or cumulative occupational radiation exposure.
- d) involve any facility changes or change any construction activities. Therefore, there is no significant construction impact.

- e) alter the design, function, or operation of any plant equipment. Therefore, there is no significant increase in the potential for or consequences from radiological accidents.

Finally, the requirements to which the exemption applies involve biennial EP exercise scheduling and therefore meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25)(vi)(G).

Accordingly, the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(25). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this exemption.

7.0 REFERENCES

1. NRC letter, "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," dated May 14, 2020 [ML20120A003]
2. NRC Letter, "U.S. Nuclear Regulatory Commission Updated Planned Actions Related to Certain Requirements for Operating and Decommissioning Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency," dated November 10, 2020 [ML20261H515]
3. Regulatory Issue Summary (RIS) 2006-003, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006 [ML053390039]
4. Temporary Staff Guidance TSG-NSIR-2020-01, "COVID-19 Related Exemptions from NRC Regulations – Emergency Preparedness Exercises," dated September 11, 2020 [ML20196M030]
5. Interim Guidance for Businesses and Employers, retrieved from <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>, on March 17, 2020.
6. NEI 06-03, "Pandemic Threat Planning, Preparation, and Response Reference Guide," Revision 2, February 2020.

8.0 ENCLOSURES

- I. FEMA Request for Exemption Letter from: Chad Gorman
Acting Assistant Administrator, National Preparedness Directorate
- II. FEMA Approval of Relief Request for Exemption Letter from: Kathy Fields
Acting Regional Administrator, FEMA Region IV
- III. ORO Letter of support from: Kimberly Steves
Director, Radiation Control Program
Kansas Department of Health and Environment
- IV. ORO Letter of Support from: Jonathan York
Response & Recovery Branch Director
Kansas Division of Emergency Management
- V. ORO Letter of Support from: Carl Lee
Director Coffey County Emergency Management

**FEMA**

May 21, 2021

MEMORANDUM FOR: Kathy Fields
Acting Regional Administrator
FEMA Region VII

FROM: Chad Gorman
Acting Assistant Administrator
National Preparedness Directorate

SUBJECT: Request for Exemption from the Frequency Requirements for
Wolf Creek Generating Station Biennial Radiological Emergency
Preparedness Program (REPP) Exercise

Pursuant to 44 C.F.R. § 350.9(c), “Exercises,” FEMA Region VII received a request from the Kansas Division of Emergency Management (KDEM) for relief from the frequency requirement to conduct the Wolf Creek Generating Station (WCGS) biennial radiological emergency preparedness exercise scheduled for November 16, 2021. The relief is specifically being requested to address the concerns posed by the development and conduct of a biennial radiological emergency preparedness exercise while offsite response organizations (OROs) are still actively responding to the ongoing public health emergency and vaccination efforts.

The relief request addresses the frequency requirements of 44 C.F.R. § 350.9(c) and adheres to guidance set forth in the “Updated Framework for Processing Relief from Frequency Requirements”. Based on the justification provided by KDEM, I am approving this relief request contingent on the exercise being rescheduled within 35 months (no later than November 2022) of the previous evaluated exercise.

If you have any further questions, please contact the Radiological Emergency Preparedness Program Branch Chief (HQ), Thomas Warnock at Thomas.Warnock@fema.dhs.gov or (202) 657-2301.

cc: Tom Morgan, RAC Chair, R7
Tom Warnock, Branch Chief, HQ REP
Kerris Bates, HQ REP
Allan Barker, NRC R3
Harral Logaras, NRC R3

ENCLOSURE II

U.S. Department of Homeland Security
FEMA Region VII
11224 Holmes Road
Kansas City, MO 64131



FEMA

May 24, 2021

Angelynn Morgan
Deputy Director
Kansas Division of Emergency Management
2800 SW Topeka Blvd.
Topeka, KS 66611

Subject: Approval of Relief from the Frequency Requirement for Biennial Radiological Emergency Preparedness Exercise for Kansas (Wolf Creek Generating Station)

Dear Ms. Morgan:

Pursuant to 44 CFR Part 350.9(c), “Exercises,” FEMA Region VII received a request from the Kansas Division of Emergency Management (KDEM) for relief from the frequency requirement to conduct the biennial radiological emergency preparedness exercise for the Wolf Creek Generating Station (WCGS) scheduled for November 16, 2021. The relief was specifically requested to address the concerns posed by the development and conduct of a biennial radiological emergency preparedness exercise while offsite response organizations (OROs) are actively responding to the ongoing public health emergency.

The request and supporting documents were reviewed by FEMA Region VII Radiological Emergency Preparedness Program (REPP) staff and a recommendation from the Regional Administrator was provided to the Assistant Administrator of the National Preparedness Directorate (NPD) for final approval through the Director of the Technological Hazards Division. Based on the documentation provided and recommendation from the Regional Administrator, the Assistant Administrator of NPD has approved the request for relief to postpone the WCGS biennial emergency preparedness exercise until no later than November 2022.

This one-time relief approval is provided specifically to address the concerns posed by the development and conduct of a biennial radiological emergency preparedness exercise while OROs are actively responding to the ongoing public health emergency.

FEMA will continue to monitor the capabilities of OROs to assure that the response to the current public health emergency does not adversely impact the ability to protect public health and safety in the event of an emergency at a commercial nuclear power plant.

Sincerely,

Kathy D. Fields
Regional Administrator, Region VII (Acting)
Federal Emergency Management Agency

Enclosures: Attachment 1, Request for relief received from KDEM
Attachment 2, Approval of request for relief received from FEMA NPD

Cc: Tom Warnock, FEMA HQ
Craig Fiore, FEMA HQ
Darren Bates, FEMA HQ
Bill Maier, NRC Region 4
Matt Dekat, Evergy

Division of Public Health
Curtis State Office Building
1000 SW Jackson St., Suite 330
Topeka, KS 66612-1365



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www.kdheks.gov/radiation

Lee A. Norman, M.D., Secretary

Laura Kelly, Governor

July 7, 2021

Mr. Matt Dekat, Manager
Emergency Planning
Wolf Creek Generating Station
P.O. Box 411
Burlington, KS 66839

Dear Mr. Dekat:

The purpose of this letter is to provide support from the Kansas Department of Health and Environment (KDHE) for the Wolf Creek Generating Station request to the U.S. Nuclear Regulatory Commission (NRC) to postpone until 2022 the evaluated emergency preparedness exercise currently scheduled for November 16, 2021. Kansas has received approval from the Federal Emergency Management Agency (FEMA) to postpone the offsite portion of the evaluated emergency preparedness exercise until 2022. The Kansas request to postpone the offsite portion of this exercise was due to the continuing impact of COVID response upon our state and local agencies and facilities. We believe that postponing the NRC-evaluated part of the Wolf Creek exercise until it can be performed in conjunction with the Offsite Response Organizations' (OROs) exercise in 2022 is the best plan for all involved. If the NRC-evaluated exercise was still held in November, there would be limited to no participation by OROs, which will limit the ability of the Wolf Creek personnel to demonstrate fully their capabilities without a large amount of simcell activity.

Please do not hesitate to contact me by E-mail at kim.steves@ks.gov if you have additional questions or need more information.

Sincerely,

A handwritten signature in black ink that reads "Kimberly Steves".

Kimberly Steves
Director, Radiation Control Program
Kansas Department of Health and Environment

2800 SW Topeka Blvd.
Topeka, KS 66611-1287



Major General David A. Weishaar
The Adjutant General and Director of
Emergency Management & Homeland Security

phone: 785-646-0001
fax: 785-646-0004
www.kansastag.gov

Laura Kelly, Governor

July 8, 2021

Mr. Matt Dekat, Manager
Emergency Planning
Wolf Creek Generating Station
P.O. Box 411
Burlington, KS 66839

Dear Mr. Dekat:

The purpose of this letter is to provide support from Kansas Division of Emergency Management (KDEM) for the Wolf Creek Generating Station request to the U.S. Nuclear Regulatory Commission (NRC) to postpone the evaluated emergency preparedness exercise currently scheduled for November 16, 2021 until 2022.

As you're aware, Kansas has received approval from the Federal Emergency Management Agency (FEMA) to postpone the offsite portion of the evaluated emergency preparedness exercise until 2022 due to a continuing active response to COVID-19 in the State. The current response is the primary focus for KDEM and other offsite response organizations (OROs) that would be involved in coordinating response and recovery for a radiological event.

KDEM believes that postponing the NRC evaluated portion of the Wolf Creek Generating Station exercise until it can be performed in conjunction with the OROs exercise in 2022 would be the most positive approach. If the NRC-evaluated exercise were held in November, there will be limited to no participation by KDEM and other OROs which will limit the ability of the Wolf Creek Generating Station personnel to demonstrate their capabilities without a large amount of simulated activity.

Please do not hesitate to contact me by e-mail at jonathan.r.york5.nfg@mail.mil for additional information.

Sincerely,

Jonathan York
Response & Recovery Branch Director
Kansas Division of Emergency Management



Coffey County Emergency Management

110 S. 6th Street,
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Phone 620-364-2721
800-947-4685

Fax 620-364-8643
www.coffeycountyks.org

July 9, 2021

Matt Dekat
Emergency Planning
Wolf Creek Generating Station
PO Box 411
Burlington, Ks 66839

Dear Mr. Dekat

This letter is to support Wolf Creek Generating Station request to the US Nuclear Regulatory Commission (NRC) to postpone until 2022 the radiological emergency preparedness exercise requirement schedule for November 16, 2021. Kansas received approval from the Federal Emergency Management Agency (FEMA) May 24, 2021 to postpone the radiological emergency preparedness exercise until 2022. The Kansas request to postpone the offsite portion of the radiological exercise was due to the continuing impact of the COVID response upon our state and local agencies. The following is the list of activities that have been and continued to implemented at the local level to slow the spread of the COVID Virus:

- Public Information
- Delivery of Vaccine to the Community
- Implementation of Non-Pharmaceutical Interventions (isolation, quarantine, promotion infection control practices in the community)
- Distribution of PPE to healthcare workers and response partners

It is believed that delaying the NRC evaluated part of the radiological exercise until it can be performed in conjunction with the Offsite Response Organizations (OROs) in 2022 is the best plan for all involved. If the NRC evaluated exercise was still held in November of 2021, there would be limited to no participation by the OROs, which will limit the ability of the Wolf Creek personnel to demonstrate fully their capabilities without a large amount of simcel activity.

Should there be any questions please contact me.

Sincerely,

Carl Lee
Director Coffey County Emergency Management