

Global Nuclear Fuel Americas (GNF-A) Response to Request for Additional Information

As described in the May 14, 2020 (revised with 2021 information) letter, to receive expedited review of an exemption request, a licensee should submit a request that contains the following information:

- a. A statement that the licensee has made a reasonable effort to reschedule the exercise during calendar year (CY) 2021 but was unsuccessful.

GNF-A Response

GNF-A has made a reasonable effort to reschedule the original exercise date of October 20, 2021 to another date during the remainder of calendar year (CY) 2021 and was unsuccessful due to: (1) offsite agency resource/schedule conflicts with other planned training and drills outside of GNF-A; (2) personnel unavailability around the upcoming holiday season; and (3) continued resource challenges and safety protocols associated with COVID. On September 16, 2021, New Hanover County reported a record-high 37 COVID-19 deaths and 467 new COVID-19 cases in the past week.

- b. A statement that if an exemption is granted to allow the licensee to conduct the CY 2021 biennial exercise in CY 2022, that future biennial exercises will continue to be held in odd years.

GNF-A Response

If the one-time exemption request is granted to allow GNF-A to conduct its CY 2021 biennial exercise in CY 2022, GNF-A will continue to hold future biennial exercises in odd years starting in CY 2023.

- c. A statement that the licensee conducted drills, exercises, and other training activities that exercised its emergency response strategies, in coordination with offsite authorities, since the previous biennial exercise.

GNF-A Response

Since the last biennial exercise on October 30, 2019, GNF-A has continued to conduct drills, surveillances and other training activities that exercise our emergency response strategies internally and with offsite agencies as described in our Radiological Contingency & Emergency Plan (RC&EP). Where COVID protocols allowed, examples included: (1) weekly, monthly, and quarterly equipment surveillances both on and offsite to ensure resources are maintained in a ready state; (2) quarterly emergency communication equipment functional tests, (3) 19 drills to maintain emergency response proficiency, (4) OSHA evacuations of site personnel, and (5) initial and requalification training of internal emergency organization and offsite agency response personnel.

- d. A statement that the rescheduled biennial exercise will be coordinated with the applicable offsite response organizations (if offsite response organization participation is required) and the applicable NRC Region.

GNF-A Response

Once GNF-A determines COVID protocols can be safely met to ensure the safety of all personnel (participants, controllers, evaluators, observers, etc.) within the confines of the site's small Emergency Control Center (ECC), the rescheduled biennial exercise will be coordinated with the applicable offsite response organizations and NRC Region II personnel. GNF-A will follow the same 60-day and 20-day exercise submittals to NRC prior to the rescheduled exercise date.