



September 15, 2021

LES-21-119-NRC

Attn: Document Control Desk  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC  
NRC Docket Number: 70-3103

Subject: Regulatory Relief Request for Conducting the Biennial Evaluated Exercise

Reference: 1) NRC License SNM-2010, Docket 70-3103  
2) Emergency Plan, Revision 27a, Section 7.3.1, Biennial Exercises  
3) NRC Temporary Staff Guidance No. TSG-DFM-2020-01, "Fuel Facility Requests for Regulatory Relief Related to COVID-19", 4/21/20

In accordance with the Reference 2 Emergency Plan, Louisiana Energy Services, LLC, dba Urenco USA (UUSA), performs a Biennial Evaluated Emergency Exercise.

Pursuant to guidance in Reference 3, UUSA hereby requests a one-time extension for conducting the 2021 Biennial Evaluated Emergency Exercise. If this request is granted and contingent on local COVID-19 conditions, UUSA plans to conduct the exercise on or before June 30, 2022. UUSA is requesting immediate evaluation for approval of this request in order to have sufficient time to notify the participating offsite agencies.

UUSA's Emergency Plan Section, 7.3.1, requires that a major exercise be conducted on a biennial basis in order to exercise coordination with offsite assistance organizations, including the testing of procedures and equipment for notifying and communicating with local and state agencies. The last UUSA biennial evaluated exercise was conducted in October, 2019.

Lea County and neighboring Chaves County are classified as Severe Risk Level, the highest in NM, based on daily new cases, infection rates and positivity test rates. Recently CDC, New Mexico State, Les County, and the UUSA facility have reinstated several COVID-19 protective measures for individuals regardless of vaccination status.

Due to rising number of positive COVID-19 cases in the local area and the increased number of personnel involved in an evaluated exercise, UUSA concludes that an evaluated exercise cannot be conducted as scheduled in October without unnecessarily increasing the risk of exposing UUSA staff, offsite responders, and members of the public to the COVID-19 virus. Approval of this temporary relief request will continue to support facility workplace protocols necessary to protect essential site personnel. UUSA will continue to perform other periodic emergency drills, training and surveillances that allow personnel to stay within COVID-19 protocols and maintain emergency response proficiency.

There is no undue risk to public health and safety from granting the requested regulatory relief. The relief is otherwise in the public interest because it will minimize the risk of exposure to the COVID-19 virus. The requested relief also does not decrease the effectiveness of the Emergency Plan, nor involve changes to security at the facility. Therefore, there is no impact on common defense and security from granting the requested regulatory relief.

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We appreciate the NRC's consideration of this request. Should there be any questions regarding the exercise, or if you would like to discuss your organization's level of interaction, please contact me at 575.394.5257.

Respectfully,

**Wyatt**

**Padgett**

Wyatt Padgett

Compliance and Licensing Manager

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