



September 22, 2021

LES-21-139-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 Information Addendum

- 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
 - 4) LES-21-119-NRC, Regulatory Relief Request for Conducting the Biennial Evaluated Exercise, September 15, 2021

UUSA has requested a one-time extension for conducting the 2021 Biennial Evaluated Emergency Exercise per LES-21-119-NRC, Regulatory Relief Request for Conducting the Biennial Evaluated Exercise. In addition to that letter, UUSA is providing additional information.

a. A statement that the licensee has made a reasonable effort to reschedule the exercise during CY 2021, but was unsuccessful.

Lea County is currently classified as Severe Risk Level, the highest in NM, based on daily new cases, infection rates and positivity test rates. The current new case rate is 87.6 per 100k for Lea County. UUSA concludes that an evaluated exercise cannot be conducted in 2021 without unnecessarily increasing the risk of exposing UUSA staff, offsite responders, and members of the public to the COVID-19 virus. UUSA has been unsuccessful in rescheduling the evaluated exercise for CY2021.

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.

UUSA's last biennial evaluated exercise was conducted in October, 2019. UUSA plans to conduct an Evaluated Emergency Exercise on or before June 30, 2022. Future Evaluated Emergency Exercises will continue to be conducted on odd years. UUSA will conduct an Evaluated Emergency Exercise for 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.

UUSA provides offsite agencies an annual Emergency Planning update. This training was last conducted on Dec 7th, 2020. This year's annual Emergency Planning update is scheduled for December 9th, 2021. Additionally, Annual Memorandums of Understanding were reviewed with all offsite agencies on August on 31st, 2021.

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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.

UUSA will conduct an evaluated exercise, which will be coordinated and scheduled with the applicable offsite response organizations and NRC Region II. This exercise will be scheduled when conditions and state mandates allow for safe participation without unnecessarily increasing the risk of exposure to UUSA staff, offsite responders, and members of the public to the COVID-19 virus.

Should there be any questions regarding the exercise, the relief request or this additional information, please contact Barry Love at 575.394.4482.


Respectfully,

Wyatt

Padgett

Wyatt Padgett

Compliance and Licensing Manager

 Digitally signed by Wyatt
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