



October 6, 2021

Dear Mr. Downs:

By our letter dated September 14, 2021, BWXT Nuclear Operations Group, Inc. – Lynchburg (BWXT NOG-L) requested approval for regulatory relief - a onetime extension to conducting the calendar year (CY) 2021 Biennial Evaluated Emergency Exercise for license SNM-42. In response to the NRC Request for Additional Information received on September 29, 2021, BWXT NOG-L is providing the following responses:

- a. *The currently scheduled biennial exercise date for CY 2021.*

**The current scheduled date for the biennial exercise is October 27, 2021.**

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

**Preparation efforts for the October 27, 2021 drill began in June 2021 in anticipation of a biennial drill that would be held in the fall of 2021, approximately two years since the 2019 biennial drill. Once a drill date was finalized, a drill team was established and efforts began to create the drill package, invitations to outside agencies, and other ancillary planning to ensure a successful drill. BWXT NOG-L has been closely monitoring the national, local, and internal pandemic levels. Once an increase was noted and with the current case rate and projected increases (holiday surge, current geographical surge in Central Virginia, etc.) in the COVID-19 cases in the Commonwealth of Virginia it was decided that it was in the best interest of all organizations to request an exemption and reschedule the drill. With the upcoming holidays and potential for further increases in COVID-19 rates, rescheduling the biennial drill in CY 2021 would not be prudent due to the potential negative impact of community spread to the participating community responders. BWXT NOG-L has communicated with NRC Region II Division of Fuel Facility Inspection (DFFI) management and staff on the need to reschedule the drill in accordance with the requirements of the SNM-42 License Application, and we are committed to coordinating with DFFI to conduct the drill at mutually agreeable date during the first half of CY 2022 should the exemption be granted.**

- c. *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.*

**If the exemption is granted, BWXT NOG-L will schedule future biennial emergency exercises in odd years beginning in CY 2023.**

- d. *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.*

**BWXT NOG-L resumed the Quarterly Emergency Exercise program in the 3<sup>rd</sup> Quarter 2021 after the expiration of the USNRC Regulatory Relief on July 1, 2021. This program was limited to the onsite Emergency Organization. BWXT NOG-L has utilized the mutual aid response with Concord Rescue Squad (CRS) for emergency medical transport. BWXT NOG-L also partnered with CRS during the multiple COVID-19 vaccination clinics by having one of their Medic Units staged onsite for use in the event of a medical emergency involving the vaccination distribution.**

**BWXT NOG-L held an offsite responders training event on September 26, 2021 at the Concord Volunteer Fire Department for Campbell County Sheriff's Department, Concord Rescue Squad, Concord Volunteer Fire Department, and Campbell County Public Safety. The topics of the training included facility familiarization, radiation safety, and nuclear criticality safety in firefighting. The BWXT NOG-L Emergency Response organization has multiple members that service their community as members of Concord Rescue Squad and Concord Volunteer Fire Department. BWXT NOG-L will also be reinstating our previous semiannual meetings with the mutual aid agency leadership. These meetings include a site briefing and will be held in December 2021 and in the first quarter of 2022.**

- e. *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.*

**In accordance with our NRC-Approved Mount Athos Site Emergency Plan, BWXT NOG-L will coordinate with our offsite response organizations/mutual aid partners and NRC Region II to schedule and conduct the biennial emergency exercise by June 30, 2022.**

If you have any questions regarding this matter, please contact me at 434-522-5202, or via e-mail to: [CTTerry@bwxt.com](mailto:CTTerry@bwxt.com).

Sincerely,

*Christopher T. Terry*  
Manager, Licensing and Safety Analysis  
BWXT NOG-Lynchburg