



Nuclear Fuel Services, Inc.

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

21G-21-0153  
GOV-01-55  
ACF-21-0275

October 7, 2021

Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
ATTN: Document Control Desk

- REFERENCES:
- 1) NRC License SNM-124, Docket 70-143
  - 2) NFS Emergency Plan, Chapter 7, Revision 27, September 2021
  - 3) NFS Letter, S.E. Barron to J. Rivera-Ortiz, NRC, Submittal of 2021 Exercise Objectives and Scenario Detail, dated August 31, 2021 (21G-21-0141)
  - 4) NRC Temporary Staff Guidance No. TSG-DFM-2020-01, "Fuel Facility Requests for Regulatory Relief Related to COVID-19", 4/21/20
  - 5) NFS Letter, Exemption Request for Conducting the Nuclear Fuel Services, Inc. Biennial Evaluated Emergency Exercise Required By 10 CFR 70.22 (I)(3)(Xii), dated September 17, 2021 (21G-21-0144)
  - 6) NRC Email, J. Downs to D. Rogers, Request for Additional Information on the NFS Request for Exemption from the Biennial Emergency Preparedness Exercise, dated September 29, 2021 (EPID L-2021-EPR-0003)

**SUBJECT: Response to NRC Request for Additional Information (RAI) Concerning the NFS Request for Exemption from the Biennial Emergency Preparedness Exercise**

Dear Mr. Downs:

By our letter dated September 17, 2021, Nuclear Fuel Services, Inc. (NFS) requested approval for regulatory relief via a onetime extension to conducting the calendar year (CY) 2021 Biennial Evaluated Emergency Exercise for License SNM-124. In response to the NRC Request for Additional Information (Reference 6) received on September 29, 2021, NFS is providing the following responses in the Attachment.

If you or your staff have any questions, require additional information, or wish to discuss this matter further, please contact me at (423) 743-1705, or Mrs. Danielle Rogers, Nuclear Safety and Licensing Section Manager, at (423) 735-5475. Please

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reference our unique document identification number (21G-21-0153) in any correspondence concerning this letter.

Sincerely,

**NUCLEAR FUEL SERVICES, INC.**

A handwritten signature in cursive script that reads "Tim Knowles".

Tim Knowles, Director  
Safety and Safeguards

Attachment: Response to NRC Request for Additional Information (RAI) Concerning the NFS Request for Exemption from the Biennial Emergency Preparedness Exercise

SEB/smd

Copies:

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Mr. Larry Harris  
NRC Senior Resident Inspector

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**Attachment A**

**Response to NRC Request for Additional Information (RAI) Concerning the NFS  
Request for Exemption from the Biennial Emergency Preparedness Exercise**

**(2 pages to follow)**

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

Nuclear Fuel Services, Inc. (NFS) anticipated conducting its biennial drill on November 9, 2021 with preparation efforts beginning in July 2021. Preparation efforts included establishing a controller/evaluator team, creating a drill scenario, finalizing a drill date, and inviting offsite agencies to participate. The date of November 9 was selected with the expectation that COVID-19 conditions would be improved but since then Northeast Tennessee has experienced a severe surge in new COVID-19 cases. Between August 1 and September 30, 25,550 new cases, 281 deaths, and record hospitalizations have been reported. Due to the significant increase in COVID-19 transmission in the community and with offsite agencies continuing to be taxed, NFS requested a onetime extension for conducting the 2021 biennial exercise and the rescheduling/conduct of the exercise by June 30, 2022. With the potential for new surges during the holidays as was seen in 2020, rescheduling the biennial drill in CY 2021 would not be prudent due to the risk of community spread to the already stressed participating offsite agencies.

**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 numbered years.**

If the exemption is granted, NFS will conduct future biennial emergency exercises in odd numbered years beginning 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.**

NFS has conducted training, hands on activities and briefings with the offsite agencies using COVID-19 mitigation guidelines including breaking down the sessions into individual agencies and maintaining small group sizes. The agencies included the Erwin Fire Department (December 7, 2020); South Unicoi County Volunteer Fire Department (December 9, 2020); Unicoi County Emergency Medical Services (December 7 and 17, 2020); Unicoi County Hospital (March 3 and September 9, 2021); and Unicoi County Emergency Management Director (August 19, 2021). The topics included updates to the Emergency Preparedness Program, radiation safety, contamination control protocols, nuclear criticality safety in firefighting and EMS/hospital management of radiation emergencies.

NFS has maintained its quarterly ERO and Fire Brigade drills/training using social distancing, multiple smaller group sizes and other COVID-19 mitigation practices.

- 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.***

In accordance with our NRC-Approved Emergency Plan, NFS will coordinate with our offsite response organizations and NRC Region II to schedule and conduct the biennial emergency exercise by June 30, 2022.