



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

April 30, 2020

MEMORANDUM TO: Michael T. Markley, Chief  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Michael Mahoney, Project Manager /RA/  
Plant Licensing Branch II-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF APRIL 15, 2020, PUBLIC MEETING WITH  
NUCLEAR INDUSTRY TO DISCUSS COVID-19 REGULATORY  
IMPACTS RELATED TO 10 CFR PART 20

On April 15, 2020, the U.S. Nuclear Regulatory Commission (NRC) staff held a public teleconference with representatives from the nuclear industry, including the Nuclear Energy Institute (NEI), NextEra, and Entergy. The purpose of the meeting was to discuss Title 10 of the *Code of Federal Regulations* (10 CFR), Part 20, "Standards for Protection Against Radiation," regulatory impacts due the COVID-19 public health emergency (PHE). The meeting notice can be found in Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20104C010, and additional information related to the meeting can be found in ADAMS at Accession No. ML20106E970.

At the start of the meeting, the NRC staff stated that the meeting was an information gathering dialogue only and as with all NRC public meetings, no regulatory decisions will be made. Additionally, the NRC stated that none of the information provided in today's meeting should be taken to be a request by any licensee or a decision by the NRC.

After Andrea Veil, Deputy Director for Engineering, in the Office of Nuclear Reactor Regulation (NRR) made opening remarks, the meeting was turned over to Janet Schlueter of NEI, Ron Gaston of Entergy, and Chris Martin of NextEra to make opening remarks.

After opening remarks, Dave Garmon, a health physicist in the Division of Risk Assessment in NRR discussed details of an NRC letter in development, regarding potential expedited 10 CFR, Part 20 exemption requests from licensees, and NRC review of the 10 CFR Part 20 exemption requests. Items discussed included:

- Draft criteria for expedited reviews for exemption from medical evaluations.
  - Statement that the licensee cannot meet medical examination evaluation requirements of 10 CFR 20.1703(c)(5)(iii).
  - Statement that licensee will manage personnel with overdue medical evaluations.
  - Estimate of number of impacted personnel, including positions.

- Estimate of date and time which the licensee will no longer be able to comply with regulatory requirements.
  - Statement that the licensee has completed or will complete all applicable respiratory protection program medical evaluation requirements, with exception to the physical medical evaluation at medical facilities.
  - Statement that a license physician has reviewed the medical history questionnaire prior to expiration of the current medical evaluation and determines the wearer remains qualified to use assigned respiratory protection equipment during the proposed exemption period.
  - A statement that impacted employees have been informed of the general risks of wearing respiratory protection.
- Draft criteria for expedited reviews for exemption from respirator fit-testing requirements.
  - A statement that the licensee cannot meet the meet the fit-testing requirements of 10 CFR 20.1703(c)(6).
  - Statement that licensee will manage personnel with overdue respiratory protection fit-tests.
  - Estimate of number of impacted personnel, including positions.
  - Estimate of date and time which the licensee will no longer be able to comply with regulatory requirements.
  - Statement that employees covered by the exemption would receive refresher training on donning their assigned respirator.
- NRC staff stated that, in considering exemption requests from 10 CFR Part 20, additional requirements may be imposed to provide continued reasonable assurance of public health and safety.

Janet Schlueter of NEI lead a discussion of industry questions to the NRC related to the following:

- What nuclear power plant personnel or working groups would the expedited exemption process be expected to address (i.e. fire brigade)?
- Possible templates and formats licensee exemption requests might be expected to follow.

No regulatory decisions were made in the meeting.

During the public question and answer session of the meeting, NRC staff addressed questions on the following topics:

- Applicability for outage workers,
- Cleaning techniques for respiratory protection masks at nuclear power plants,
- Number of respiratory protection masks at nuclear power plants,
- Use of voluntary dusk masks and related requirements to dusk masks,
- Does the current 90-grace period for respiratory protection mask fit tests require NRC verbal approval,
- Potential NRC correspondence related to 10 CFR Part 20 to include decommissioned facilities and fuel facilities,
- Recording of NRC public meetings, and
- Respiratory mask fit test applicability with masks of various material.

M. Markley

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Enclosure:  
List of Attendees

## List of Attendees

April 15, 2020, Public Meeting with the Nuclear Industry

Regarding COVID-19 Regulatory Impacts Related to 10 CFR, Part 20

Name	Organization
Andrea Veil	NRC
Mirela Gavrilas	NRC
Craig Erlanger	NRC
Mohamed Shams	NRC
Scott Burnell	NRC
Ed Miller	NRC
Greg Bowman	NRC
Mike Franovich	NRC
Dave Garmon	NRC
Maggie O'Banion	NRC
Nathan Sanfilippo	NRC
Juan Peralta	NRC
Michael Markley	NRC
Michael Mahoney	NRC
Harold Anagnostopoulos	NRC
Adam Gendleman	NRC
Matt Young	NRC
Jim Danna	NRC
Bernadette Baca	NRC
Jonathan Rowley	NRC
Janet Schlueter	NEI
Hillary Lane	NEI
Tom Basso	NEI
Marty Phalen	NEI
Ron Gaston	Entergy
Brad Cole	Entergy
Chris Martin	NextEra
Steve Catron	NextEra
Doug Jones	Cooper Nuclear Station
Betsy Langille	TVA
Janise Stoliarova	FEMA
Daniel Cronin	University of Florida
Clinton Gross	WCNOC
Erica Gray	Individual
Bob Porter	Individual
Bill Bullard	Individual
Brian Henderson	Individual
Paul Gunter	Beyond Nuclear
Scot Wright	Individual

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TO DISCUSS COVID-19 REGULATORY IMPACTS RELATED TO 10 CFR,  
PART 20 DATED APRIL 30, 2020

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RidsOpaMail Resource

**Meeting Notice: ML20104C010****Additional Meeting Information: ML20106E970****ADAMS Accession No.: ML20113E972****\*via e-mail**

OFFICE	NRR/DORL/LPL2-1/PM	NRR/DORL/LPL2-1/LA	NRR/DORL/LPL2-1/BC
NAME	MMahoney	KGoldstein	MMarkley
DATE	04/23/2020	04/23/2020	04/29/2020
OFFICE	NRR/DORL/LPL2-1/PM		
NAME	MMahoney		
DATE	04/30/2020		

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