



May 13, 2020

To: Mr. X. Yin, License R-110 Project Manager, NRC  
Subject: Request for Exemption to License R-110 Requirements  
Reference: NRC Letter from H. Nieh to NEI, *"U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for Operator Licensing During the Coronavirus Disease 2019 Public Health Emergency,"* dated April 14, 2020

On January 31, 2020, the U.S. Department of Health and Human Services declared a public health emergency (PHE) for the United States to aid the nation's healthcare community in responding to the Coronavirus Disease 2019 (COVID-19). As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) Idaho State University requests an exemption from certain 10 CFR Part 55 Operator Licensing requirements for ISU AGN-201m as documented in this exemption request. By submitting this exemption request, ISU AGN-201m is proactively taking steps to implement interim actions during the exemption period that supports the health and safety of both worker and medical personnel to limit the spread of the COVID-19 virus. This request is being made to support the ISU AGN-201m efforts to maintain Centers for Disease Control and Prevention (CDC) recommendations related to social distancing, worker screening, and limiting close-proximity work.

Idaho State University considers reliable operator performance to be essential to safe operations, and in accordance with the reference letter, requests exemption from the requirements of the regulations identified in this document.

**It is requested to be exempted from the minimum of four operating hours per calendar quarter requirement normally needed to maintain active status under 10 CFR 55.53(e).**

The ISU AGN-201m Qualification Plan Section IV.C. states, "As a minimum, to demonstrate proficiency at manipulating the reactor facility controls, each operator will perform at least one complete Operating Procedure #1 (OP 1) startup and shutdown per quarter . . ." (The Qualification Plan is included as an attachment to this letter for your reference.)

The alternate measures being taken during this exemption period include the following:

ISU AGN-201m Operators will participate in monthly refresher training sessions to ensure they maintain familiarity with the facility. These training sessions will cover updates to procedures, console changes, facility updates and other emergent topics. They will continue until the end of the PHE or the expiration of this exemption, whichever comes first.

The records of attendance will be maintained by the Reactor Administrator or Reactor Supervisor and included in the requalification training records when the exemption expires. Any operator who does not complete the training will become inactive and need to follow 10 CFR 55.53(f) before being reactivated.

Idaho State University understands that, if approved, this exemption will be in effect until 90 days after the PHE is ended, or December 31, 2020, whichever occurs first.

Respectfully,

A handwritten signature in black ink, appearing to read "Scott Snyder", with a long horizontal stroke extending to the right.

Scott Snyder  
Interim Vice President for Research

cc. NRC Document Control Desk  
Mary Lou Dunzk-Gougar, Reactor Administrator and Supervisor  
Jonathan Scott, Reactor Supervisor in Training

Attachment: ISU AGN-201m Operator Requalification Plan