

**Public Meeting on the Emergency  
Preparedness Biennial Exercise  
Exemption Process During the  
COVID-19 Public Health Emergency**

June 23, 2020

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# Background and Purpose

- On January 31, 2020, the U.S. Department of Health and Human Services declared a Public Health Emergency (PHE) for the United States.
- On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization.
- This meeting will be a discussion among participants regarding the EP biennial exercise requirements and guidance documents related to requesting an exemption from the performance of these exercises.
- NRC is seeking information on the impact of COVID-19 on EP biennial exercises.

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# Biennial Exercise and 8 Year Exercise Cycle Requirements

- 10 CFR 50.47(b) (14)
- Appendix E to 10 CFR 50
  - E.IV.F.2.b and 2.c
- 8-calendar-year exercise cycle as established in December 2011 EP rule
  - First 8-year exercise cycle for a site began in the calendar year in which the first hostile action based (HAB) exercise was conducted. First HAB must be performed by Dec 2015.
  - Biennial exercises shall vary the content of scenarios to provide for the ERO to demonstrate proficiency in the key skills necessary to respond to the following scenario elements over the 8-year cycle:
    - hostile action directed at the plant site,
    - no radiological release or an unplanned minimal radiological release that does not require public protective actions,
    - an initial classification of or rapid escalation to a Site Area Emergency or General Emergency,
    - implementation of strategies, procedures, and guidance under § 50.155(b)(2),
    - and integration of offsite resources with onsite response.

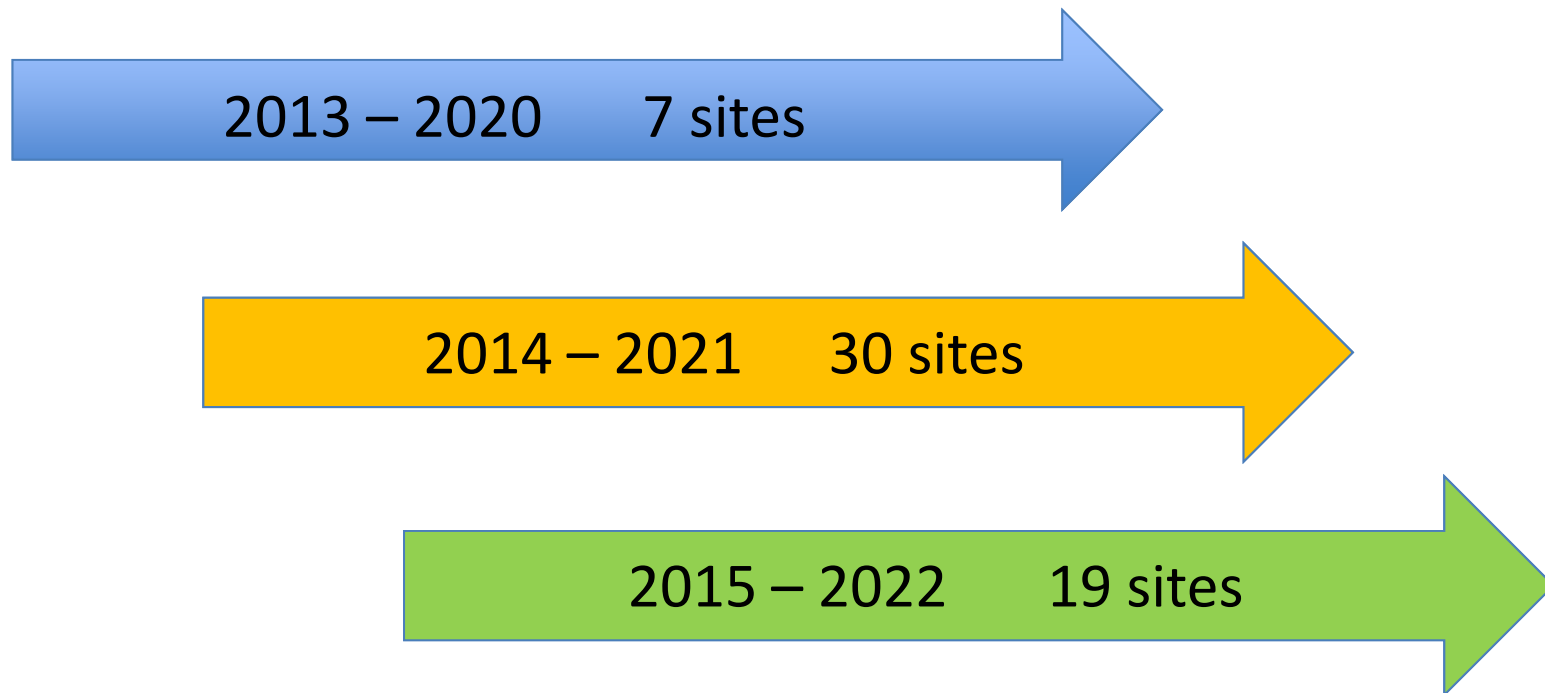
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# 8 Year Exercise Cycle Requirements

- 8-calendar-year exercise cycle as established in 2011 EP rule
  - Start a drill or exercise between 6:00 p.m. and 4:00 a.m. Some unannounced.
  - All functions in each Emergency Response Facility
  - Providing medical care for injured, contaminated personnel (every two years).
  - Response to essentially 100 % of initiating conditions for classification of emergencies.
  - All licensee ERO teams must be provided the opportunity to demonstrate key skills
    - within the scope of their duties.
    - Use of procedures developed in response to an aircraft threat
    - Use of the strategies to mitigate spent fuel pool damage scenarios
    - Use of the to mitigate reactor accidents and maintain containment

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## 8 Year Exercise Cycle



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# Biennial Exercise Requirements

- Each Biennial exercises shall demonstrate ERO proficiency in key skills:
  - Timely classification of events;
  - Timely notification of offsite authorities;
  - Assessment of radiological releases onsite and offsite;
  - Development of protective action recommendations;
  - Dissemination of information to the public via media channels;
  - Engineering assessment, repair plan development, and repair of critical equipment under emergency conditions;
  - Mitigative action implementation;
  - Protection of workers during emergency response, including medical care;
  - Response to operational transients while implementing the emergency plan; and
  - Coordination with Offsite Response Organizations.

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# 2020 / 2021 Biennial Exercises Original Schedule



2020 29 sites



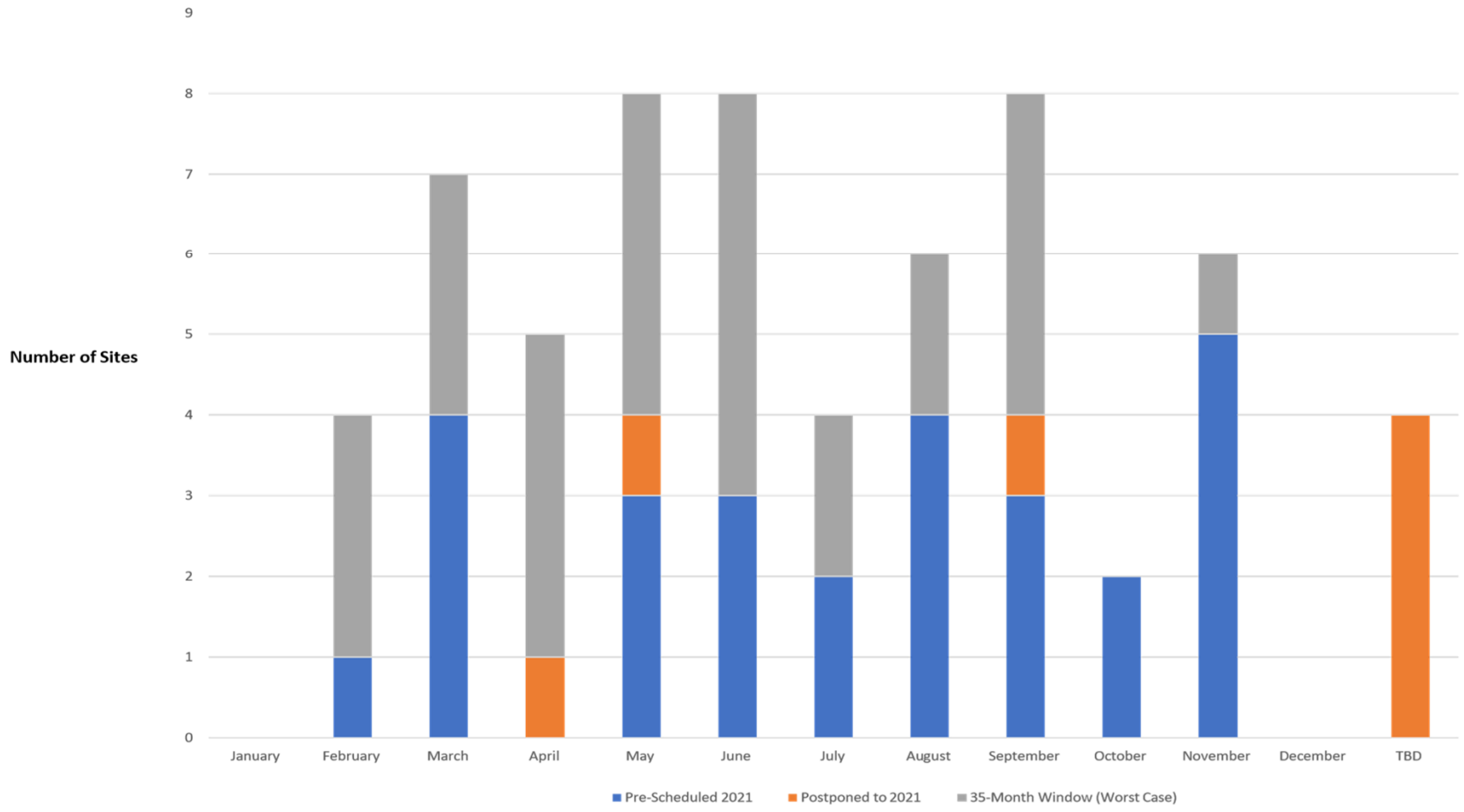
2021 27 sites

# Biennial EP Exercises as of June 22, 2020

Facility	NRC Region (host)	FEMA Region (host)	Last Biennial Exercise	35 - Month Window	Original Scheduled Date	PHE Postponement	Current Date (NRC part)	Current Date (FEMA part)	Exemption to 2021?	States	8-Year Cycle Dates
Beaver Valley	I	III	Jun-2018	May-2021	6/9/2020	X	11/10/2020	TBD		PA, WV, OH	2014-2021
Calvert Cliffs	I	III	Sep-2019	Aug-2022	9/14/2021		9/14/2021	9/14/2021		MD, PA	2015-2022
Fitzpatrick	I	II	Jun-2019	May-2022	8/9/2021		8/9/2021	N/A		NY	2015-2022
Giinna	I	II	Aug-2019	Jul-2022	8/24/2021		8/24/2021	8/24/2021		NY	2013-2020
Indian Point	I	II	Sep-2018	Aug-2021	11/17/2020		11/17/2020	11/17/2020		NY	2014-2021
Limerick	I	III	Nov-2019	Oct-2022	11/16/2021		11/16/2021	11/16/2021		PA	2013-2020
Millstone	I	I	Mar-2018	Feb-2021	6/24/2020	X	TBD	TBD	X	CT, MA, RI	2014-2021
Nine Mile Point	I	II	Oct-2019	Sep-2022	10/5/2021		10/5/2021	10/5/2021		NY	2015-2022
Peach Bottom	I	III	Apr-2018	Mar-2021	4/21/2020	X	12/8/2020	TBD		PA, MD	2014-2021
Salem/Hope Creek	I	III	May-2018	Apr-2021	5/19/2020	X	4/28/2021	4/28/2021	X	NJ, DE	2014-2021
Seabrook	I	I	Apr-2018	Mar-2021	9/29/2020	X	12/8/2020	12/8/2020		NH, MA	2014-2021
Susquehanna	I	III	Oct-2018	Sep-2021	10/20/2020		10/20/2020	10/20/2020		PA	2014-2021
Browns Ferry	II	IV	Jun-2019	May-2022	6/23/2021		6/23/2021	6/23/2021		AL	2015-2023
Brunswick	II	IV	Jul-2018	Jun-2021	7/28/2020	X	12/1/2020	12/1/2020		NC	2014-2022
Catawba	II	IX	Mar-2018	Feb-2021	4/7/2020	X	10/27/2020	10/27/2020		SC, NC	2014-2022
Farley	II	IV	Oct-2018	Sep-2021	6/30/2020	X	TBD	TBD	X	AL, GA	2014-2022
Harris	II	IV	May-2019	Apr-2022	9/14/2021		9/14/2021	9/14/2021		NC	2015-2023
Hatch	II	IV	Oct-2019	Sep-2022	11/1/2021		11/1/2021	11/1/2021		GA	2013-2021
McGuire	II	IV	Aug-2019	Jul-2022	8/3/2021		8/3/2021	8/3/2021		NC	2015-2023
North Anna	II	III	Jul-2018	Jun-2021	8/18/2020		8/18/2020	2/23/2021		VA	2014-2022
Oconee	II	IV	Aug-2018	Jul-2021	9/1/2020		9/1/2020	9/1/2020		SC	2014-2022
Robinson	II	IV	May-2019	Apr-2022	5/18/2021		5/18/2021	5/18/2021		SC	2013-2021
Saint Lucie	II	IV	Jan-2020	Dec-2022	1/14/2020	X (offsite only)	1/14/2020	11/17/2021		FL	2014-2022
Sequoyah	II	IV	Oct-2018	Sep-2021	10/14/2020		10/14/2020	10/14/2020		TN	2014-2022
Summer	II	IV	Aug-2019	Jul-2022	3/2/2021		3/2/2021	3/2/2021		SC	2013-2021
Surry	II	III	Jul-2019	Jun-2022	7/20/2021		7/20/2021	7/20/2021		VA	2015-2023
Turkey Point	II	IV	Feb-2019	Jan-2022	2/17/2021		2/17/2021	2/17/2021		FL	2015-2023
Vogtle	II	IV	May-2018	Apr-2021	5/19/2020	X (offsite only)	12/8/2020	TBD		GA, SC	2014-2022
Watts Barr	II	IV	Nov-2019	Oct-2022	11/17/2021		11/17/2021	11/17/2021		TN	2015-2023
Braidwood	III	V	Mar-2020	Feb-2023	3/2/2020		3/2/2020	3/2/2020		IL	2014-2021
Byron	III	V	Oct-2019	Sep-2022	3/23/2021		3/23/2021	3/23/2021		IL	2015-2022
Clinton	III	V	Mar-2019	Feb-2022	11/16/2021		11/16/2021	11/16/2021		OH	2014-2021
Davis Besse	III	V	Apr-2019	Mar-2022	5/4/2021		5/4/2021	5/4/2021		MI	2015-2022
DC Cook	III	V	Apr-2019	Mar-2022	6/29/2021		6/29/2021	6/29/2021		IL	2013-2020
Dresden	III	V	Jul-2019	Jun-2022	7/20/2021		7/20/2021	7/20/2021		IL	2013-2020
Duane Arnold	III	VII	May-2018	Apr-2021	4/15/2020	X	9/2/2020	9/2/2020		IA	2014-2021
Fermi	III	V	Aug-2018	Jul-2021	12/15/2020		12/15/2020	12/15/2020		MI	2014-2021
LaSalle	III	V	Jun-2018	May-2021	11/17/2020		11/17/2020	11/17/2020		IL	2014-2021
Monticello	III	V	Sep-2019	Aug-2022	8/11/2021		8/11/2021	8/11/2021		MN	2015-2022
Pallades	III	V	Apr-2018	Mar-2021	10/27/2020		10/27/2020	10/27/2020		MI	2014-2021
Perry	III	V	Sep-2018	Aug-2021	9/15/2020		9/15/2020	9/15/2020		OH	2014-2021
Point Beach	III	V	Jun-2019	May-2022	5/25/2021		5/25/2021	5/25/2021		WI	2015-2022
Prairie Island	III	V	Jul-2018	Jun-2021	7/21/2020	X (offsite only)	TBD	TBD	X	MN, WI	2014-2021
Quad Cities	III	V	Dec-2018	Nov-2021	8/11/2020		8/11/2020	8/11/2020		IL, IA	2014-2021
ANO	IV	VII	Jul-2018	Jun-2021	9/15/2020	X	TBD	TBD	X	AR	2014-2021
Callaway	IV	VII	Aug-2019	Jul-2022	9/21/2021		9/21/2021	9/21/2021		MO	2015-2022
Columbia	IV	X	Mar-2018	Feb-2021	3/24/2020	X	10/27/2020	10/27/2020		WA	2014-2021
Comanche Peak	IV	VI	Nov-2019	Oct-2022	5/5/2021		6/16/2021	6/16/2021		TX	2015-2022
Cooper	IV	VII	Jul-2018	Jun-2021	5/5/2020	X	5/25/2021	5/25/2021	X	NE, MO	2014-2021
Diablo Canyon	IV	IX	Oct-2018	Sep-2021	8/19/2020	X	9/15/2021	9/15/2021	X	CA	2014-2021
Grand Gulf	IV	IV	Mar-2019	Feb-2022	3/16/2021		3/16/2021	3/16/2021		MS, LA	2015-2022
Palo Verde	IV	IX	Mar-2019	Feb-2022	3/9/2021		3/9/2021	3/9/2021		AZ	2015-2022
River Bend	IV	VI	Jun-2018	May-2021	6/24/2020	X	12/1/2020	12/1/2020		LA	2014-2021
South Texas	IV	VI	Jun-2018	May-2021	10/28/2020		10/28/2020	10/28/2020		TX	2014-2021
Waterford	IV	VI	Nov-2019	Oct-2022	10/26/2021		10/26/2021	10/26/2021		LA	2015-2022
Wolf Creek	IV	VII	Dec-2019	Nov-2022	11/16/2021		11/16/2021	11/16/2021		KS	2015-2022



**2021 Biennial Exercises  
With Worst Case Scenario 35-Month Windows**



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# The Exemption Process

- 10 CFR 50.12 Special Circumstances
- Regulatory Issue Summary (RIS) 2006-003
  - ML053390039
- Exemption Letter, May 14, 2020
  - ML20120A003

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# Previous Biennial Exercise Exemption

- 2001, Limerick Generating Station
  - temporary one time exemption from Appendix E IV.F.2.c, (offsite only) in October 2001 as a result of 9/11 on-going national security threat
  - Additionally, Limerick local and State agencies were directly participating in 9/11 activities
  - Commission determined, pursuant to 10 CFR 50.12(a)
    - the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security.
    - special circumstances are present pursuant to 10 CFR 50.12(a)(2)(v), in that the exemption would only provide temporary relief from the applicable regulations.

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# Information Exchange

## **NRC is seeking information on the impact of COVID-19 on Biennial EP Exercises**

- If NRC and/or FEMA grant exemption(s) from 2020 exercise(s), are there impacts to the currently scheduled 2021 exercises?
- Are there resource constraints that the NRC should be aware of?
- Are there new technologies being considered to replace gathering in Emergency Response Facilities or other areas which NRC should review in an expedited manner to support future exercises?

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# Public Meeting on the Emergency Preparedness Biennial Exercise Exemption Process During the COVID-19 Public Health Emergency

Questions?