

# **Millstone Power Station Units 1/2/3 (MPS)**

## **MPS Biennial Emergency Preparedness (EP) Exercise Date Change Exemption Request**

**NRC Pre-Submittal Meeting  
August 19, 2020**

# Meeting Objectives

- Due to COVID-19 restraints and response activities, Dominion Energy Nuclear Connecticut, Inc. (DENC) will be requesting a one-time schedular exemption for the MPS Biennial EP Exercise originally scheduled for June 23, 2020
- Key Goals for This Meeting:
  - Brief NRC on proposed exemption request, supporting information, and proposed timeline
  - Discuss the request prior to formal submittal
  - Ensure common understanding of the request, scope and regulatory expectations

# Proposed Exemption

- MPS Biennial EP Exercise was scheduled for June 23, 2020
- DENC is requesting an exemption to postpone the Biennial EP Exercise until Calendar Year (CY) 2021
  - Last MPS Biennial EP Exercise that was federally-evaluated by NRC and Federal Emergency Management Agency (FEMA) was held on March 20, 2018

# Regulatory Requirements

## 10 CFR 50.47

- (b)(14) – Conduct periodic exercises

## 10 CFR 50 Appendix E

- IV.F.2.b – Onsite Biennial Exercise
- IV.F.2.c – Offsite Biennial Exercise

## **Basis for Request & Precedent**

- Meeting the requirements of 10 CFR 50 Appendix E IV.F.2.b and IV.F.2.c require the MPS Biennial EP Exercise to be performed in CY 2020
  - Exemption Request will be submitted to conduct this exercise in CY 2021, as authorized by 10 CFR 50.12, “Specific Exemptions”
  - Request will address the guidance criteria contained in Regulatory Issue Summary (RIS) 2006-03, “Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements”

# Reasons for Request

- Ongoing response to the COVID-19 pandemic
  - Public Health Emergency (PHE) declared on 1/31/20
  - During the week of 3/7/20, a State of Emergency was declared in New York, Rhode Island, Connecticut, and then Nationally
  - The COVID-19 PHE created special circumstances (per 10 CFR 50.12) that precluded MPS and the states listed above from conducting a full participation exercise in June of 2020

# Reasons for Request

- An exemption is needed for DENC and state responders to reduce the exposure risk to responders/essential workers and to adhere to Center for Disease Control and Prevention (CDC) recommended guidelines
- States of Connecticut, Rhode Island and New York, as well as municipal stakeholders, are engaged in pandemic response
  - Resources for exercise preparation and participation in simulated response would compete with resources devoted to pandemic response
- Gathering a large group of people (including players, controllers, evaluators) for an exercise when there is no actual emergency:
  - Puts all participants at risk
  - Conflicts with practices recommended by the CDC

# Scheduling Considerations

- A good faith effort was made to reschedule and conduct the exercise in 2020, but DENC and all applicable states determined they could not participate until 2021
- In addition to ongoing COVID-19 concerns, DENC's schedule challenges in 2020 include:
  - 2020 Fall Millstone Unit 3 refueling outage
  - Previously-scheduled NRC/Institute of Nuclear Power Operations (INPO) Audits/Inspections/Evaluations
  - Nationwide exercise schedule, which challenges NRC/FEMA resources
- States foresee challenges continuing into the first quarter of 2021
  - This includes a potential for COVID-19 resurgence
- A proposed date of June 8, 2021 could be supported by all parties



# Justification – Maintaining Preparedness

- The exemption request will include lists of:
  - Numerous inter-facility drills and exercises integrating on-site and off-site responders
  - Extensive on-site and off-site training
  - Tabletop sessions for local emergency managers
  - List of FEMA-evaluated drills and exercises
- Through these activities, the exemption request will validate that DENC has regularly exercised its emergency response strategies and personnel in coordination with off-site authorities

# Justification – RIS 2006-03 Guidance

- RIS 2006-03 states that in most cases, the postponed exercise still falls within the 35-month window
  - The proposed date of June 8, 2021 is 39 months from the last biennial exercise
- Off-Year plume/post-plume phase exercise was conducted in October 2019 with extensive participation by the states
  - State of Connecticut is determining whether FEMA observation can be credited for portions or all of the exercise
- The exemption request will:
  - Justify that sufficient training, drills, and exercises have been conducted to ensure that exceeding the 35-month guidance in RIS 2006-03 by four months does not pose a threat to emergency response to protect public health and safety
  - Conform to the remaining guidance provided in RIS 2006-03

# Applicability & Inspection History

- Inspections and Evaluations conducted by NRC and FEMA since March 2018 MPS Biennial Exercise have identified zero findings of Significance and zero Programmatic Issues
- Conclusion: The exemption request will demonstrate that the rescheduling of the MPS Biennial EP Exercise will support COVID-19 mitigation and prevention activities and will not present an undue risk to the public health and safety

# Precedents

- Impact of COVID-19 has resulted in the Exercise Exemption Request submittals for the following plants (which are currently under NRC review):
  - Cooper Nuclear Station (ML20191A276)
  - Diablo Canyon, Units 1 and 2 (ML20191A204)
  - Arkansas Nuclear One, Units 1 and 2 (ML20195A397)
  - Perry Nuclear Power Plant, Unit 1 (ML20216A258)

# Schedule

- Submittal of exemption request to the NRC is expected by end of August 2020
- NRC approval is requested by December 2020, based on the requirements for biennial EP exercise participation expiring at the end of 2020

# Questions?