



# PALISADES NUCLEAR PLANT (PNP) PRE-SUBMITTAL MEETING

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**Request for One-Time Exemption from  
10 CFR 50, Appendix E Biennial Emergency  
Preparedness Evaluated Offsite Exercise  
Requirements due to COVID-19 Pandemic**

**September 28, 2020**

# Introductions

- Otto Gustafson – Regulatory Assurance and Performance Improvement Director - PNP
- Daniel Malone – Emergency Planning Manager - PNP
- Jeffery Hardy – Regulatory Assurance Manager - PNP
- Greg Norris – Entergy Corporate Licensing
- Ron Gaston – Entergy Director Regulatory Compliance

# Background

10 CFR 50, Appendix E, Section IV.F.2.c states, “Offsite plans for each site shall be exercised biennially with full participation by each offsite authority having a role under the radiological response plan. Where the offsite authority has a role under a radiological response plan for more than one site, it shall fully participate in one exercise every two years and shall, at least, partially participate in other offsite plan exercises in this period.”

Due to the COVID-19 pandemic, the State of Michigan has requested postponement of Offsite Response Organizations participation in the 2020 Biennial Graded Exercise of the Palisades Nuclear Plant.

# Background

- The offsite biennial emergency preparedness exercise is currently scheduled for October 27, 2020
- Entergy is requesting approval of this exemption request by December 31, 2020, to remain compliant with 10 CFR 50, Appendix E

# Reference Documents

- Regulatory Issue Summary 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006 (ML053390039)
- NRC Letter, "U.S. Nuclear Regulatory Commission Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for All Licensees During the Coronavirus Disease 2019 Public Health Emergency," (ML20120A003), dated May 14, 2020
- NRC Letter, "Addendum to U.S. Nuclear Regulatory Commission Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for Power Reactor Licensees During the Coronavirus Disease 2019 Public Health Emergency," (ML20223A152), dated September 2, 2020
- NSIR Temporary Staff Guidance TSG-NSIR-2020-01, "COVID-19 Related Exemptions From NRC Regulations – Emergency Preparedness Exercises," dated September 11, 2020 (ML20196M030)

# Reference Documents

- Palisades submittal content consistent with available guidance
- TSG-NSIR-2020-01 submittal content checklist used in development of Palisades exemption request

# Similar Precedent

## Diablo Canyon Nuclear Power Plant

*Temporary Exemption from Biennial Emergency Preparedness Exercise Frequency Requirements of 10 CFR Part 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," Sections IV.F.2.b and IV.F.2.C (EPID L-2020-LLE-0111 [COVID-19]), (ML20247J651), dated September 18, 2020*

## Cooper Nuclear Station

*Temporary Exemption from Biennial Emergency Preparedness Exercise Requirements of 10 CFR Part 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities, Section IV.F (EPID L-2020-LLE-0102 [COVID-19]), (ML20203M129), dated September 3, 2020*



# QUESTIONS?

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