

**Public Meeting**

***Licensing Issues to address the COVID-19 Public Health Emergency going forward***

**October 15, 2020**

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# NRC Approach

- Coordination of activities across agency
- Tracking cumulative and potentially synergistic effects of regulatory actions
- Each action considered on a case- and situation-specific basis
  - Preserve safety
  - Evaluate undue hardship/public interest
- Continued stakeholder engagement

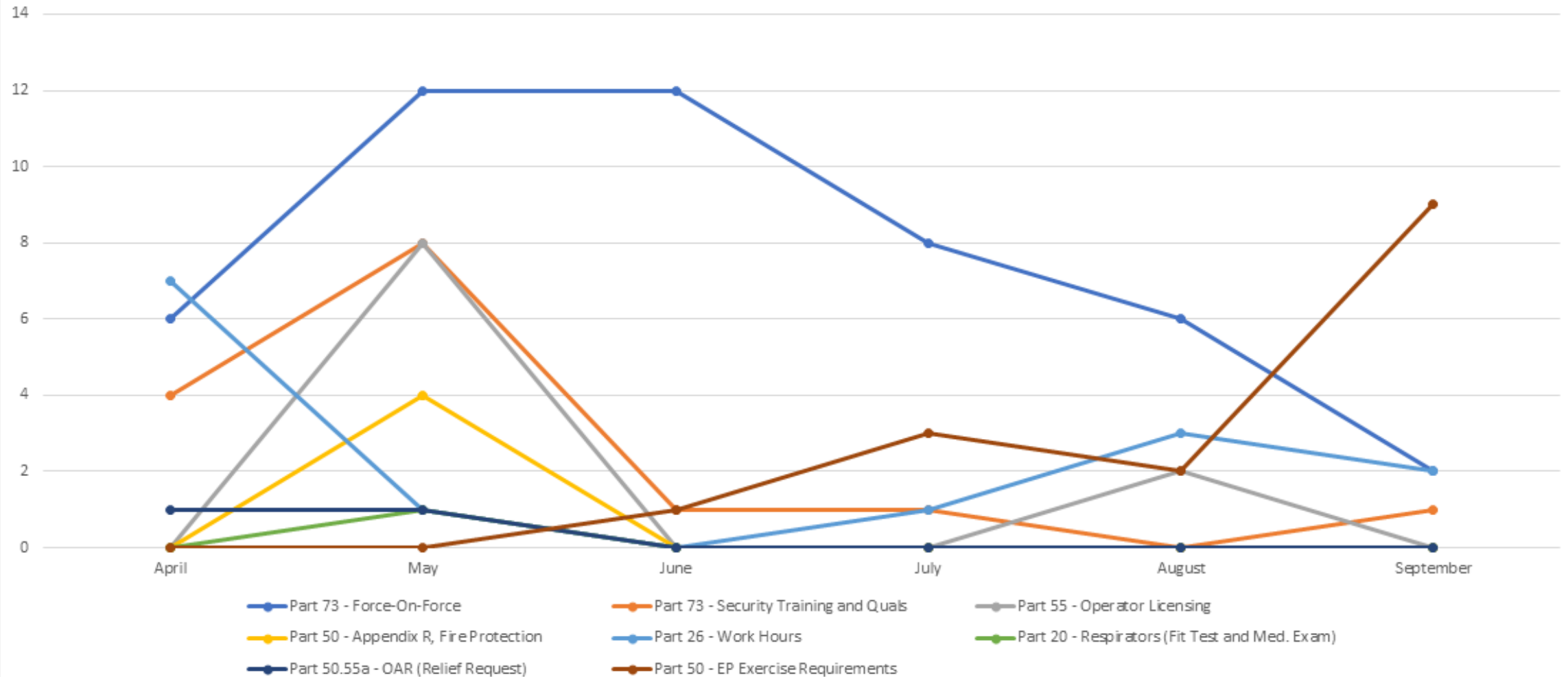
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# Topical Areas

Regulatory guidance for exemptions/relief issued

- Part 26 – Work hours
- Part 50.55a – Owner's Activity Reports
- Part 55 – Operator requalification program and medical exams
- Part 20 – Respirator fit tests and medical evaluations
- Fire Protection Plan Requirements
- Emergency Plan Biennial Exercise
- Part 73 – Security training and qualification

# COVID-19 Exemptions Submitted



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# Overall Guidance

Applicable to all requests

- Working on a letter to address various topical areas
- Submit via normal process (i.e., Mail, EIE, online form, if available)
  - Keep assigned PM informed
- Specifically address impacts of COVID-19 that necessitate licensing action
  - Original requests were during a more homogenous environment of restrictions
  - Varying levels of restrictions and their impacts need to be addressed
  - Individual licensee situation and hardship needs to be addressed

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# Part 26 – Work Hours

## Applications

- Several applications by industry
- Anticipate applications going forward

Letter – ML20087P237

Addendum – ML20098B333

## Requests

- Need to address why unable to comply with work hour controls and how exemption will mitigate the impact of COVID-19 on safety/security
- Sequential usage:
  - Exemption periods separated by less than 14 days of compliance with Part 26 work hour controls
  - Need to address contributing and mitigating factors for cumulative fatigue

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# 50.55a – Owners Activity Report

## Applications

- Some Applications by industry
- Anticipate Applications going forward

Letter – ML20098D975

## Requests

- Licensee will need to address inability of technology or other solutions such as remote collaboration to meet requirements

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# Part 55 – Requalification and Medical Exams

## Applications

- Some applications by industry
- Anticipate applications going forward

Letter – ML20104C071

## Requests

- Original letter may be of use in developing exemption request
- Should include date for when compliance will be achieved
- For requalification should provide dates of last requalification exams and scheduled end date of current cycle
- For medical exemption provide when make-up exam will be conducted

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# Part 20 – Respirator Fit Tests and Medical Evaluations

## Applications

- Low applications by industry
- Do not anticipate applications going forward

## Requests

- Original letter may be of use in developing exemption request

Letter – ML20099G757

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# Fire Protection

## Applications

- Low application by industry
- Do not anticipate applications going forward

Letter – ML20122A022

## Requests

- Existing letter cover going into 2021 for live fire training
- Original letter may be of use in developing exemption request in other areas
- Licensees may consider whether community volunteer firefighting activities could be credited towards compliance

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# Emergency Preparedness Exercise

## Applications

- Significant applications by licensees
- Anticipate applications going forward

## Requests

- Existing letters cover 2020
- Staff considering need for letter addressing 2021

Letter – ML20120A003

Addendum – ML20223A152

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# Part 73 – Security Training and Qualification

## Non Force-on-Force

### Applications

- Some applications by industry
- Do not anticipate applications going forward

### Requests

- Original letter may be of use in developing exemption request
- See additional slides

Letter – ML20105A483

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# Part 73 – Security Training and Qualification Force-on-Force

## Applications

- Significant applications by industry
- Anticipate applications going forward

## Requests

- NRC plans to issue letter in October to provide additional clarification for 2020 exercises
- Staff considering need for letter addressing 2021
- See additional slides

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# Fuel Facilities and Spent Fuel Storage

## Usage

- Small number of requests from these licensees
  - Seven requests for Fuel Cycle Facilities
  - Five requests for ISFSIs
- Topics
  - Training and Requalification
  - Emergency Preparedness Drills

## Subsequent Requests

- Currently, very limited indications of requests for extensions or new requests.
- Early notification and pre-application communications are strongly encouraged.

Letter – ML20094G166

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# Decommissioning and Uranium Recovery

## Usage

- Small number of requests from these licensees
  - Three requests Decommissioning Reactor Facilities
  - Four requests for Uranium Recovery Facilities
- Topics
  - Training and Training Exercises
  - Ground Water Monitoring
  - Radiation Safety Technician Qualifications

## Subsequent Requests

- Currently, licensees are reviewing their need to request for extensions or new requests.
- Early notification and pre-application communications are strongly encouraged

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# Stakeholder Perspectives

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# Questions