



Input on Actions to Address COVID-19 Exemptions

October 15, 2020

Introductions and Opening Statement

Exemptions with Limited Further Needs

- 10 CFR Part 20 Respiratory Radiological Protection – only one request that came from a Research Test Reactor. No requests from any LWR licensees. No anticipated need for extension or requests for 2021.
- 10 CFR 55 Operators' License – only one request for extension from a Research Test Reactor. No need for general exemption extension or applications anticipated for 2021 at this time.
- 10 CFR 50.55a Owners Activity Report – some requests anticipated for 2021 Spring outages.

10 CFR 50.55a Codes and Standards

- CY 2020: Requests submitted for relief/alternatives for Fall 2020 outages on as-needed bases
- CY 2021: Anticipate similar requests for Spring 2021 outages if no appreciable improvement in health risk

10 CFR Part 26 Work Hour Requirements

- CY: 2020 and 2021: Extensions primarily for outages anticipated through 2020 and into 2021 for Spring outages.
- A specific item for NRC consideration is reduction of maintenance worker days off from 6 to 4 to align with existing outage allowance.
- Clarity around the extent to which the WHR exemption can be used pre-outage, for example a standard one week of pre-outage work could be performed using the alternate WHR provisions. More than a week could be allowed if justified by the licensee.

10 CFR Part 50.48 Fire Brigade Requirements

- CY 2020 and 2021: Potential exemptions needed for fire drills and extensions for annual training dependent on vendor availability
- CY 2021: “Live fire” training already extended through December 2021

10 CFR Part 73 Physical Protection

- For CY 2020, exemptions granted to licensees for elements of Part 73
 - Examples: Annual Exercise, Range Activity/Weapon Qualifications
 - Licensees will not be required to make up 2020 Annual Exercises
- For CY 2021, RG 5.75, *Training and Qualifications*, will be utilized to develop flexibility for what licensees can do to meet the Annual Exercise requirement without violating site-specific pandemic plan(s)/restriction(s)
 - Other exemptions for Part 73 requirements will be handled as-needed
- Agreed upon flexibility/options for 2021, we anticipate “full” compliance
 - Any options outside of RG 5.75 would require NRC approval

Questions and Discussion
