

# **Pre-Submittal Meeting for:**

COMANCHE PEAK NUCLEAR POWER PLANT

DOCKET NOS. 50-445 AND 50-446

April 6, 2021

One-Time Exemption Request From the  
Biennial Emergency Preparedness Exercise  
Requirements of 10 CFR 50 Appendix F  
Due to COVID-19 Pandemic

# Participants

- Comanche Peak
  - Patrick Allen, CPNPP EP Manager
  - Jim Barnette, CPNPP Licensing
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- NRC
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# Purpose/Background Information

- Vistra Operations Company LLC (Vistra OpCo) will be requesting COVID-19 related exemptions to move the 2021 Comanche Peak Nuclear Power Plant (CPNPP) biennial emergency plan onsite and offsite exercise requirements to CY 2022.
  - Onsite – 10 CFR 50 Appendix E, Section IV.F.2.b
  - Offsite – Appendix E, Section IV.F.2.c
- Regulatory Basis – Vistra OpCo has made good faith efforts to comply with the regulations and an exemption to not conduct the biennial exercise in CY 2021 will provide only temporary relief from the applicable regulations.

# Purpose/Background Information

- On January 31, 2020, the U. S. Department of Health and Human Resources declared a public health emergency (PHE) for the United States in response to the Coronavirus Disease 2019 (COVID-19). On March 11, 2020, the COVID-19 outbreak was characterized as a pandemic by the World Health Organization. CPNPP continues to follow practices recommended by the Centers for Disease Control and Prevention to limit the spread of COVID-19. New efforts to vaccinate the population have further limited the availability of offsite resources needed to adequately schedule, perform, and evaluate the biennial exercises.

# Purpose/Background Information

- CPNPP Biennial Exercise Information
  - Last Exercise – November 6, 2019
  - Current Scheduled Exercise Date – June 16, 2021
- Since the 2019 exercise, CPNPP has conducted drills, exercises and other training activities in coordination with offsite authorities, to exercises emergency responses strategies.
- Vistra OpCo has made an effort to reschedule the exercise date during 2021 but was unsuccessful.

# Proposed 2022 Biennial Exercise Plans

- A 2022 graded exercise date has been tentatively proposed for July 27, 2022.
  - The finalized date for a 2022 biennial exercise will be within 35 months from the conduct of the November 2019 exercise.
- Rescheduling of the biennial exercise will be coordinated with the applicable offsite response organizations (OROs), NRC Region IV and FEMA Region 6.
  - The State and local response organizations have been briefed of the exemption request plans and support the effort to move the biennial exercise to CY 2022 so that they may continue to focus efforts on COVID-19 response and vaccination efforts.
  - CPNPP will provide letters from local offsite organizations and the State in support of the proposed exemption.
    - The OROs have indicated that they will not be impacted in a manner that would adversely affect their ability to maintain capability to support emergency response activities in the event of an actual emergency.
    - CPNPP will continue to work with responsible OROs to maintain their radiological emergency plans.
- If exemptions are granted to allow the CY 2021 exercise to be conducted in 2022, future biennial exercises will continue to be held in odd years - currently scheduled July 19, 2023.

# References

Vistra OpCo intends to develop the exemption request using the below-listed documents:

- RIS 2006-03, “Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirement,” dated February 25, 2006 [ML053390039]
- NRC Letter, “Planned Actions Related to Emergency Preparedness Biennial Exercise Requirements for All Licensees During the Coronavirus Disease 2019 Public Health Emergency,” dated May 14, 2020 [ML20120A003]
- 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,” dated September 2, 2020 [ML20223A152]
- Temporary Staff Guidance TSG-NSIR-2020-01, “COVID-19 Related Exemptions from NRC Regulations – Emergency Preparedness Exercises,” dated September 11, 2020 [ML20196M030]

# Planned Exemption Schedule

- Submittal of Exemption by **April 15, 2021**
- Request approval by **June 1, 2021**



# Questions?