U.S. Nuclear Regulatory Commission management of the Covid-19 situation (as of March 2021)

National background	
General	
U.S. authorities instructions regularly delivered	Yes – U.S. Office of the President and relevant Executive Branch Departments
Clear established and regularly updated provisions	Yes: National Response Framework and Executive Orders related to emergency planning • Phase 1: coming to the office only for actions of high importance and with prior approval • Phase 2: only if mandatory "for the nation"
USNRC	
Provisions for the USNRC	Are decided by the Commission and staff, as appropriate, and are consistent with the U.S. national instructions
Contingency plan	NRC Pandemic Plan, established in 2006, updated annually NRC Continuity of Operations Plan, established in 1999, updated annually
Staff of USNRC	2729 employees (13% are managers)
Missions of the USNRC	
Sustained missions – Summary	• The vast majority of the staff are teleworking. The IT infrastructure is more than adequate for the USNRC to meet its health and safety mission. Thousands of virtual sessions/meetings are being held each day, including telephone and videoconferences with regulated entities and the public. • Normal licensing and most enforcement activities continued unaffected. In addition, the licensing and enforcement level of effort increased because of COVID-related relief actions in areas where licensees' normal business is affected by the epidemic. While inspector on-site presence has been reduced and some non-time-critical inspection activities have been deferred, effective oversight continues with increased use of technology to support remote inspection and continued risk-informed on-site inspection for key activities.
Currently	The NRC's mission continues, with certain adjustments being made related to licensing, oversight, and enforcement activities in light of the COVID-19 pandemic to enable physical distancing, implement appropriate mitigative measures for field and office staff, and minimize face-to-face interactions.
Key activities	The NRC is taking a variety of measures to ensure the health and safety of employees while maintaining its important safety and security mission despite the challenges posed by the COVID-19 pandemic. The NRC has made every attempt to provide an opportunity for employees performing mission-critical functions to receive vaccinations. The Health Insurance Portability and Accountability Act (HIPAA) is a federal law that protects sensitive patient health care information from being disclosed without the

	patient's consent or knowledge. Therefore, in order to not violate HIPAA requirements, the NRC does not collect vaccination statistical information. For more information about specific actions, please see the NRC's COVID-19 information website.
Reactor Inspections	
Routine inspections	On March 27, 2020, the NRC staff updated Inspection Manual Chapter 2515, Appendix E, "Inspection Program Modifications during Pandemics, Epidemics, or Other Widespread Illness or Diseases," (ADAMS Accession No. ML20079E700) to provide inspection program and oversight guidance. On April 6, a memorandum (ADAMS Accession No. ML20097E538), was issued to provide guidance on "Resident Office Site Coverage and Baseline Inspection During Maximum Teleworking for COVID-19." The NRC's Resident Inspectors are maintaining site coverage while maximizing the use of telework. On May 28, 2020, a memorandum (ADAMS Accession No. ML20141L766) was issued to provide guidance on "Inspection Guidance During Transition from COVID-19 Mandatory Telework." This guidance confirmed that very few modifications were required to the 2020 reactor oversight process (ROP), and it established the goal for the calendar year 2020 ROP to be completed with at least the minimum inspection samples for the baseline inspection program for each site. This memo also gave guidelines to the Regions in transitioning the inspection effort from mandatory telework; such as beginning to schedule and implement team and individual inspections and increasing resident inspector on-site presence and inspection activities. The memo also discussed that inspectors should leverage telework technology during administrative aspects of the ROP. On February 1, 2021, a memorandum (ADAMS Accession No. ML21027A274) "Calendar Year 2021 Inspection Guidance During COVID-19 Telework Restrictions" was issued restoring the ROP completion goal for CY 2021 to nominal inspection samples for the ROP baseline inspection program and allowing for minimum sample completion when needed. The memo also reiterates that the Regions should continue to consider risks to inspectors' health and safety—and that of licensees' employees—when making decisions about inspection completion. Additionally, the memo states that ROP guidance in the enclosure of the May 28, 2020 memo remains in effect for regional execution of the inspection program for CY 2021. Routine inspection highlights include: • Resident inspectors are coordinating their onsite presence to approximately every three business days using physical distancing practices and minimizing potential exposure to licensee staff. • Resident inspectors have established remote access to licensee documents and data systems (e.g., corrective action program, control room logs, daily meeting documents, procedures, plant process computer, etc.) to the maximum extent possible. • Inspectors are periodically verifying that licensees have sufficient staffing levels in key positions (e.g., operations, emergency response organization, security).

	• Additionally, inspectors are evaluating deferred maintenance and other activities, use of overtime, and the need for licensing or other regional support. • NRC management in the four Regional offices will determine the need for, and authorize, onsite inspection activities at nuclear power plants beyond those already authorized for resident inspectors. • Nationwide, as of December 31, 2020, the staff had completed more than the minimum number of baseline inspection samples for CY 2020. • The staff recently issued "Initial Report on Challenges, Lessons Learned and Best Practices from the 2020 COVID-19 Public Health Emergency – Focus on Regulatory Oversight of Operating Nuclear Reactors" (ADAMS Accession Nos. ML20308A389 for the report and ML21003A006 for the package). The report documents the review by a multidisciplined team that evaluated lessons learned and best practices from the implementation of the ROP during the initial phases of the COVID-19 public health emergency. The report also includes several near- and long-term recommendations that were developed for consideration as the NRC continues to implement the ROP during the COVID-19 public health emergency and for future emergencies that require the staff to perform extensive telework. The recommendations, which were shared during a January 27, 2021, public meeting, also address how the NRC might prepare for remote oversight in the future for normal, non-emergency conditions. • Baseline inspections such as Emergency Plan exercises, triennial team inspections, including outage inspections, were deferred during the initial COVID-19 response period and have been rescheduled. • In 2020, NRC-led force-on-force (FOF) exercises were temporarily halted for approximately 5 months due to COVID-19 PHE conditions and the nature of the inspections, such as the complex and performance-based nature of FOF exercises requiring extensive planning, a large number of interdisciplinary participants, and a broad range of activities that require gatherings of both small and large groups and close quarters interactions. • in August 2020, the staff issued Inspection Procedure (IP) 92707, "Security Inspection of Facilities Impacted by a Local, State, or Federal Emergency Where the NRC's Ability to Conduct Triennial Force-on-Force Exercises is Limited." The inspection procedure was used for the performance of limited scope security inspection activities from August to December 2020 while full-scope FOF exercises could not be safely conducted. • For 2021, the staff developed a multi-pronged approach to provide an optimal oversight approach based on site-specific COVID-19 conditions. The staff added guidance to its full-scope FOF IP 71130.03, "Contingency Response, Force-on-Force Testing," with special protocols to mitigate COVID-19 PHE concerns. The staff also issued an update to IP 92707 to incorporate best practices and lessons learned from use of the IP in CY 2020. The updates to the existing IPs provide guidance to ensure a holistic assessment is

	performed while being mindful of the site-specific circumstances associated with COVID-19. • On February 28, 2021, the staff issued a Temporary Staff Guidance document to describe the conditions under which IP 92707 should be used, i.e., when a licensee has demonstrated a hardship that would preclude use of IP 71130.03 with COVID-19 PHE protocols. Staff will continue to monitor COVID-19 PHE-related conditions to make site-specific decisions for delaying inspections, or in the event of licensee-identified scheduling hardships, to use the updated IP 92707 instead of IP 71130.03 (with COVID-19 PHE protocols). Additional information can be found in the NRC's COVID-19 Regulatory Activities for Nuclear Reactors public website.
Confirmed inspections	For event response situations, inspectors have used remote means for uncomplicated plant trips/transients and other event reports of very low safety significance. NRC management in the four Regional offices will authorize any on-site response for risk-significant events such as complicated scrams, loss of offsite power events, loss of shutdown cooling events, or declared emergencies. The licensee's operational status may be an additional consideration when determining modifications to the baseline inspection program and site coverage.
Nuclear Power Facilities	
Continuity plan	• Power reactors (Title 10 Code of Federal Regulations (CFR) Part 50 licensees) have been designated as critical infrastructure by the U.S. Government. • One nonpower reactor may meet the critical infrastructure criteria (medical isotope production), while the others could be characterized as essential because their work supports government agencies. • NRC regulations do not require that licensees have continuity of operation plans.
Staffing	• Licensees are implementing site-specific responses to minimize the risk of disease transmission and overall impact on facilities. Starting in March 2020, the NRC established a process for power reactor licensees to expeditiously request exemptions (and relief requests) to various requirements of Title 10 of the Code of Federal Regulations (CFR). The NRC held multiple public meetings and issued various letters to the nuclear industry explaining when the agency would provide expedited reviews for certain COVID-19 PHE-related exemptions and relief request. The regulatory areas, which the agency would provide expedited reviews are as follows: 1. Work hour controls requirements specified in 10 CFR 26.205(d)(1) through (d)(7), ADAMS Accession Nos. ML20087P237 and ML20098B333. 2. Deferral requests for submission of Owners Activity Reports consistent with 10 CFR 50.55a(z)(2), ADAMS Accession No. ML20098D975. 3. Requirements related to the 24-month requalification program, research and test reactors proficiency, and biennial medical examinations in 10 CFR, Part 55, ADAMS Accession No. ML20104C071.

	4. Security training requirements specified in 10 CFR 73, Appendix B, Section VI, Accession No. ML20105A483. 5. Medical evaluation frequency and respirator fit-testing frequency requirements specified in 10 CFR 20.1703(c)(5)(iii) and 10 CFR 20.1703(c)(6), ADAMS Accession No. ML20099G757. 6. Fire brigade annual medical exams, quarterly drills, and annual live fire training requirement specified in 10 CFR 50.48, ADAMS Accession No. ML20122A022. 7. Biennial emergency plan exercise requirements specified in 10 CFR 30.32(i)(3)(xii), 10 CFR 40.31(j)(3)(xii), 10 CFR Part 50, Appendix E.IV.F, 10 CFR 70.22(i)(3)(xii), and 10 CFR 72.32(a)(12)(i) and (ii), in accordance with the NRC's regulations in 10 CFR 30.11, 10 CFR 40.14, 10 CFR 50.12(a), 10 CFR 52.7, 10 CFR 70.17, and 10 CFR 72.7, ADAMS Accession Nos. ML20120A003 and ML20223A152. • On November 10, 2020 (ADAMS Accession No. ML20261H515), the NRC issued a letter to provide guidance on the continued use of expedited processes beyond December 31, 2020, for COVID-19 PHE related requests in seven topical areas. Enclosures to the letter address informational needs for each of the seven topical areas to facilitate the continued licensee's use of the NRC's expedited review process, such as providing justifications for the hardships that have resulted from the COVID-19 PHE and information related to the potential cumulative effects of these exemptions. Additional information can be found in the NRC's COVID-19 Regulatory Activities for Nuclear Reactors public website.
Planned maintenance	• Power reactors successfully completed their spring and fall 2020 refueling outages. Power reactors are currently planning for and implementing 2021 spring refueling outages. The NRC has hosted multiple remote meetings with reactor licensees and continues enhanced communication to identify licensing needs (including those related to outages), that may result from the COVID-19 PHE. • As noted above, the NRC issued a letter which describes a process for power reactor licensees to expeditiously request a deferral of 10 CFR Part 50.55a Owners Activity Report (letter issued on April 9, 2020 (ADAMS Accession No. ML20098D975). The purpose of the Owners Activity Report is to provide a summary of items with flaws or relevant conditions that required evaluation for continued service, and repair/replacement activities required for continued service that occurred during the refueling outage. As noted above, on November 10, 2020 (ADAMS Accession No. ML20261H515), the NRC issued a letter to provide guidance on the continued use of expedited processes beyond December 31, 2020. Additional information can be found in the NRC's COVID-19 Regulatory Activities for Nuclear Reactors public website.
Other facilities	
General Note	• On February 19, 2021, the NRC issued "Actions Required to Maintain the Effectiveness of Office of Nuclear Material Safety Inspection Programs" (ADAMS Accession No. ML21048A030, non-

	public). This memorandum provided direction to NRC program management in headquarters and the regions on the periodic review of inspection manual chapters to ensure that inspection programs are being effectively implemented and to promote consistency in assessing and reporting the effectiveness of inspection programs. The memorandum also provided interim guidance on decision-making and documentation of adjustments in the implementation of inspection programs, aimed especially at adjustments associated with the COVID-19 PHE. • On June 1, 2020, the NRC issued "Inspection Guidance During Transition from Covid-19 Mandatory Telework for the Nuclear Materials and Waste Safety Program" (ADAMS Accession No. ML20143A281). • A combination of remote and focused on-site inspections are currently being conducted in consideration of local conditions and necessary precautions for each facility. NRC management continues to evaluate future inspections on a case-by-case basis to determine if inspections should be deferred, conducted on-site, remotely, or a combination thereof. • Licensing activities are continuing with some lower priority actions being delayed, including those related to medical facilities. The Agency considers requests for amendments or reliefs due to the impact of the COVID-19 PHE to be high priority. Regulatory relief for licensees is being examined as the impacts from the PHE continue for an extended period. For current ongoing licensing activities where proposed regulatory actions have been issued for public comment, comment periods have been extended, and additional remote public meetings have been hosted by the NRC to provide additional opportunities for public participation in the regulatory process. • The NRC held a remote public meeting on October 15, 2020, to discuss with impacted stakeholders potential future licensing issues to address the COVID-19 PHE beyond 2020. The NRC also held a remote public meeting on November 17, 2020 to summarize the existing COVID-19 regulatory relief available to medical licensees and other NRC materials licensees, and to outline additional relief that is being considered for future development by the NRC. • In addition, the NRC continues to hold routine periodic town hall meetings with staff on oversight to disseminate best practices in implementing inspection programs during the extended COVID-19 PHE. • For more information, see the NRC's COVID-19 Regulatory Activities for Nuclear Materials public website.
Fuel Facilities	• Facility Operations: Fuel facilities are continuing operations. Facilities are implementing flexible staffing measures to reduce person-to-person contact. • Licensing: Several requests for regulatory relief were received early in the pandemic (April-May 2020). Limited relief was granted with temporary license conditions primarily in the areas of routine training and routine reporting requirements. Towards the end of the year (November -December 2020), additional relief requests were received

	and granted as it became clear that the pandemic would continue into the new year. Some of these requests were for extensions to previous relief. The NRC held a remote public meeting on December 7, 2020 to summarize the existing COVID-19 regulatory relief available to fuel facilities licensees and discuss with impacted stakeholders potential future licensing issues to address the COVID-19 PHE. Some temporary license conditions have expired while others continue in effect until the expiration date is reached. • NRC Oversight: Inspections at fuel cycle facilities continue to be performed either on-site, remotely, or a combination thereof.
Independent Spent Fuel Storage Installations (ISFSIs)	• Facility Operations: ISFSIs co-located at operating reactors, at decommissioning power reactors and stand-alone ISFSIs continue to operate normally with flexible staffing measures to reduce person-to-person contact. Some facilities submitted requests, which the NRC has approved, for necessary relief in the areas of training, physicals, and weapons qualifications (gun range) for the security force. Those relief requests have now concluded and the facilities have returned to their prior training and qualification requirements.
Radioactive Materials and Sources	• Agreement States Oversight: There are currently no impacts to licensing activities in the Agreement States. Most Agreement States are conducting a combination of on-site and remote inspections as local conditions and restrictions permit. Some Agreement States continue to temporarily postpone routine inspections at particular facilities (e.g., medical facilities) and will only perform reactive inspections, allegation follow-ups, or respond to events, on a case-by-case basis at these facilities. Most Agreement States have developed plans to resume onsite inspections and are phasing in implementation of their respective plans. Some Agreement States have identified the need for potential regulatory relief to licensees from scheduled routine measurements and sampling as the impacts from the pandemic continue for an extended period. • NRC Oversight: Some licensees have submitted, and the NRC has approved, requests for necessary relief in areas such as instrument and annual survey instrument calibrations, physical inventory of sealed sources, and provision of radiation safety and operational instructions.
Decommissioning and Uranium Recovery	• Facility Operations: Work at some decommissioning power reactors is continuing, within the emergency declarations made by the individual States. Sites in SAFSTOR have no ongoing activities. There are no major activities at decommissioning materials sites, many of which have gone to reduced staffing commensurate with each individual State's emergency declarations. There are no ongoing activities at the three NRC-regulated uranium recovery facilities. Some licensees have submitted, and the NRC has approved, requests for necessary relief in areas such as training and requalification requirements and routine monitoring activities.
Medical field	

Main statement	Considered highly critical for the nation, and nuclear activities are adapting, in order to secure treatment for the emergencies.
Inspections	• Agreement States Oversight: Some Agreement States continue to temporarily postpone routine inspections and will only perform reactive inspections, allegation follow-ups, or respond to events, on a case-by-case basis. Many Agreement States are conducting a combination of on-site and remote inspections as local conditions and restrictions permit. Most Agreement States have developed plans to resume onsite inspections and are phasing in implementation of their respective plans. Some Agreement States have identified the need for potential regulatory relief to licensees from scheduled routine measurements and sampling as the impacts from the pandemic continue for an extended period. • NRC Oversight: The NRC Regional Offices are conducting inspections remotely, remote with onsite follow-up, and onsite. NRC management continues to evaluate inspections on a case-by-case basis to determine if inspections should be deferred, conducted onsite, remotely, or a combination thereof. • Facility Operations: Some licensees have submitted, and the NRC has approved, requests for necessary relief in areas such as instrument and annual survey instrument calibrations, physical inventory of sealed and brachytherapy sources, and provision of radiation safety and operational instructions.
Staffing	Some medical facilities have reduced on-site staff. However, the NRC is not aware that the reduction of on-site staff has impacted medical facilities in safely performing urgent and critical nuclear medicine and radiotherapeutic procedures. The NRC is monitoring this issue.
Crisis management	
Emergency shift	24/7 Operations Center
Calls to the emergency shift	Through normal, government-provided means
NRC Emergency Preparedness (EP) Requirements and Current Status	NRC regulations require that EP exercises, emergency response staff training, annual program reviews, etc., are conducted within specified frequencies. Licensees and governmental agencies have been employing diverse ways to conduct the required EP activities while following applicable COVID-19 safety protocols, and the NRC has granted exemptions, upon licensee request, for the performance of the EP activities within the required frequencies. Licensees and governmental agencies have indicated they are able to staff their emergency response organizations and implement their emergency plans should a radiological event occur.
NRC Response Operations	• The NRC has an Operations Center (Ops Center) that provides effective support for NRC Headquarters response activities, including receipt of reports for reactor events, materials events, and other information. The Ops Center provides prompt feedback to NRC Headquarters and the regions regarding reported events that require immediate attention and notifies other Federal agencies of

	significant events. The Ops Center remains staffed 24 hours a day, 7 days a week. • The Commission and key decision makers of the NRC remain informed of intelligence and threat assessment products from the United States Intelligence Community on medical intelligence and EP topics as they relate to COVID-19.
USNRC Daily running	
Staff	
Teleworking – most of staff	Maximum/Expanded telework (U.S. Government requirement). On March 16, 2020, NRC began allowing full-time telework for all employees in its Headquarters and Regional offices, in response to the COVID-19 PHE. On March 19, 2020, the NRC Executive Director for Operations mandated that all NRC employees telework unless performing mission-critical functions that required being in the NRC offices or at an NRC-licensed facility. In June 2020, the NRC moved into Phase 1 of its re-occupancy plan for all NRC facilities. In Phase 1, specific training was required for the entire workforce before they were permitted to return to work. In addition, temperature checks are required to enter the buildings in Phase 1 and masks must be worn in all NRC facilities in Phases 0 through 2. Subsequently, some NRC facilities entered into Phase 2 of the re-occupancy plan in July 2020, which entails expanded telework with maximum flexibilities, while other facilities remained in Phase 1. As the COVID-19 situation continued to evolve towards the end of the calendar year 2020, NRC modified its operations so most facilities are now in Phase 1 and one facility is in Phase 2. Telework continues to be encouraged for all employees who are able to do so. State and local conditions and mitigative measures continue to be monitored and assessed and facility phases modified if necessary
Specific cases	As stated above, some staff perform mission-critical functions that require being in the NRC offices or at an NRC-licensed facility. Those staff may require specific permissions for on-site work.
Material	
Personal computer	Staff are using NRC-issued laptops enabled with Teams, Webex, and other communication tools.
Phones	System capability to forward office phones to personal telephones.
Others	• Remote access: available to all staff (multiple access methods in case of system problems) • Emails • Video conferences • Audio conferences
Communication with stakeholders	
Paper mail	The NRC has limited ability to process paper mail inquiries from the public during the COVID-19 PHE. The NRC continues to respond to phone calls and emails from the public. To better enable paperless processing of requests from NRC licensees, the staff has created several online portals for website submission of certain COVID-19-related regulatory relief/exemption requests.
Others	Phone and email communication as usual. The NRC continues to issue press releases electronically, and is using social media postings (Twitter, Facebook) to highlight agency actions during the COVID-19 PHE.

	Launched an online submissions portal where licensees can submit requests electronically.
Meetings	Despite NRC staff working remotely, the NRC continues to hold public meetings via virtual collaboration tools and is committed to openness, transparency, and public engagement as part of our decision-making process. We have used social media, press releases, and newspaper advertisements to highlight the occurrence of these meetings, as well as opportunities to participate in our processes. The NRC has also increased its outreach to local stakeholders that might not have the capabilities to interact as effectively through the internet and social media by holding additional "one-on-one" meetings with community members via telephone. In addition, the NRC has used pre-recorded radio broadcasts, both in English and the native language of the local community, to communicate on NRC activities.