U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

U.S. Nuclear Regulatory Commission COVID-19 situation management

(as of May 2020)

Presentation: The purpose of this paper is to present the COVID-19 management established within the U.S. Nuclear Regulatory Commission to handle the continuous service of the United States nuclear safety and radiation protection authority and the choices taken to do so.

U.S. Nuclear Regulatory Commission management of the Covid-19 situation

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, Executive Orders related to emergency planning • Phase 1: coming to the office only if high importance and with prior approval • Phase 2: only if mandatory “for the nation”
USNRC	
Provisions for the USNRC	Are decided by the NRC 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 (12.9% are managers)
Missions of the USNRC	
Sustained missions - Summary	• A significant majority of staff are teleworking with effective workstations and bandwidth for all employees to work a full day to ensure the USNRC is meeting its health and safety mission. Thousands of remote sessions/meetings are being held each day. • Licensing and most enforcement are unaffected. In fact, the licensing and enforcement teams’ level of effort has increased because of requests for relief received from licensees. Where licensees cannot conduct some aspect of their normal business, the USNRC is providing relief consistent with its health, safety, and security mission. • While in-person inspections have been significantly restricted, some inspections are being done remotely and Resident Inspectors continue to work every day remotely and have been provided guidance on how often to visit sites in person.
Currently	The NRC’s missions continue, with certain adjustments being made related to licensing, oversight, and enforcement activities in light of the COVID-19 pandemic to enable physical distancing 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 coronavirus. 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 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 by maximizing the use of telework. • 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. • Baseline inspections such as Emergency Plan exercises, Force-on-Force, triennial team inspections, including outage inspections, have been deferred during this period. These inspections will be rescheduled as soon as conditions permit to ensure licensees continue to meet NRC requirements. • Other baseline inspections are being evaluated to determine which inspection objectives can be accomplished remotely. 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 will use 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	• The NRC has established a process for power reactor licensees to expeditiously request exemptions to 10 CFR Part 26 (Work Hours) (see the NRC's letter dated March 28, 2020, ADAMS Accession No. ML20087P237). There have been multiple 10 CFR Part 26 Work Hour exemption requests submitted and approved using this process. • On April 14, 2020 (ADAMS Accession No. ML20104C071), the NRC issued a letter to the nuclear industry that would cover both operating reactors and research and test reactors, regarding a process for licensees to efficiently request exemptions to various provisions within 10 CFR, Part 55 (requalification training and examinations, medical examinations, operator license renewals) due to anticipated impacts associated with the COVID-19 public health emergency (PHE). • The NRC held a remote public meeting on April 15, 2020 to discuss with the nuclear industry, 10 CFR Part 20 requirements related to annual respirator fitting and medical examinations. The NRC is developing a process for licensees to promptly request Part 20 exemptions. • On April 20, 2020 (ADAMS Accession No. ML20105A483), the NRC issued a letter to the nuclear industry regarding a process for licensees to efficiently request exemptions from certain 10 CFR Part 73, Appendix B, Section VI security requirements during the COVID-19 PHE. • On April 27, 2020, (ADAMS Accession No. ML20099G757), the NRC issued a letter to the nuclear industry regarding a process for licensees to efficiently request exemption from certain 10 CFR Part 20 requirements related to respiratory protection during the COVID-19 PHE. • The NRC held a remote public meeting on April 29, 2020, to discuss with the nuclear industry, 10 CFR 50.48 fire protection potential exemptions. The NRC is developing a process for licensees to promptly request 10 CFR 50.48 exemptions. • The NRC held a remote public meeting on April 30, 2020, to discuss with the nuclear industry, potential emergency preparedness enforcement guidance and exemption requests during the COVID-19 PHE. • Licensees are implementing site-specific responses to minimize the risk of disease transmission and overall impact on facilities. Additional information can be found in the NRC's COVID-19 Regulatory Activities for Nuclear Reactors public website.
Planned maintenance	• Some power reactors are scheduled to have spring refueling outages. • The NRC has hosted multiple remote meetings with reactor licensees and continues enhanced communication to identify licensing needs that may result from COVID-19 (e.g., exemptions to work hour limits, deferral of selected surveillances, etc.). ○ The NRC is internally establishing communication and processing teams to evaluate options and accommodate these anticipated requests.

	○ The NRC issued a letter on April 9, 2020 (ADAMS Accession No. ML20098D975), which describes a process for power reactor licensees to expeditiously request a deferral of 10 CFR Part 50.55a Owners Activity Report. 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. Additional information can be found in the NRC's COVID-19 Regulatory Activities for Nuclear Reactors public website.
Other facilities	
General Note	All inspections are delayed except for essential inspections, which may include the response to events. Inspection activities are being conducted consistent with Agency guidance and, while most in-person inspections have been postponed, some inspections are being done remotely. 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 COVID-19 to be high priority. Regulatory relief to licensees is being examined as the impacts from the pandemic continue for an extended period. For more information, see the NRC's COVID-19 Regulatory Activities for Nuclear Materials public website.
Fuel Facilities	• Facility Operations: Most fuel facilities are continuing operations. Facilities are implementing flexible staffing measures to reduce person-to-person contact. Some licensees are preparing exemption requests for routine observations, periodic qualification updates, and routine measurements to proactively address potential staffing shortages, in preparation for an extended pandemic in the United States. • NRC Oversight: Resident Inspectors at Category I fuel facilities will continue on-site activities at a reduced schedule and perform oversight functions remotely, similar to Resident Inspector activities at the power reactor sites. On April 17th a memorandum (ADAMS Accession No. ML20106F226), was issued to provide guidance on "Resident Inspector Coverage at Category I Fuel Facilities During COVID-19." The NRC is coordinating requests from fuel cycle facilities for relief related to fatigue management, emergency planning audits, and security drills and exercises that are conducted in conjunction with other governmental agencies.
Independent Spent Fuel Storage Installations (ISFSIs)	• NRC Oversight: The NRC is working with ISFSI licensees to discuss upcoming relief requests in the area of security training and qualification requirements. • Facility Operations: ISFSIs at decommissioning power reactors and stand-alone ISFSIs continue to operate normally with flexible staffing measures to reduce person-to-person contact.
Radioactive Materials and Sources	• Agreement States Oversight: There are currently no impacts to licensing activities in the Agreement States. Approximately 36 of 39 Agreement States have temporarily postponed routine inspections and will only perform reactive inspections, allegation follow-ups, or

	respond to events, on a case-by-case basis. 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 has hosted multiple remote public meetings with materials licensees and the public and continues enhanced communication to identify licensing needs that may result from COVID-19 (specifically those related to licensees in 10 CFR Parts 30, 34, 35 and 37). On April 24, the NRC established a process for materials licensees to expeditiously request exemptions to parts 30, 34, 35, 36, 37, 39, 40, 50, and 72). • On May 5, 2020, the NRC issued a letter providing information regarding licensee requests for temporary exemptions from certain 10 CFR Parts 19, 20, 30, and 35 requirements during the COVID-19 PHE including the process that the NRC plans to use when reviewing such requests and a list of regulatory requirements that may be suitable for expedited exemption review by the NRC (ADAMS Accession No. ML20126G386 and ML20129K060). • On May 20, 2020, (ADAMS Accession No. ML20134H934), the NRC issued a letter regarding a process for licensees to efficiently request exemption from certain 10 CFR Part 37 requirements during the COVID-19 PHE.
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.
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: Approximately 36 of 39 Agreement States have temporarily postponed routine inspections and will only perform reactive inspections, allegation follow-ups, or respond to events, on a case-by-case basis. 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: All routine inspections have been delayed, with reactive and special inspections performed on a case-by-case basis. Virtual inspections are being considered.
Staffing	• On May 14, the NRC issued a letter providing information on a table of medical regulations that may be suitable for expedited review as exemption requests are processed. The most up-to-date table is maintained on the NRC's Medical Uses Licensee Toolkit at https://www.nrc.gov/materials/miau/med-use-toolkit.html (see the "Related Information" box on the right-hand side of the page) (ADAMS Accession No. ML20135G471).

Staffing (cont.)	• Many 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 are currently looking at postponing these required EP activities, and it may become necessary for the NRC to grant exemptions 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 regulatory attention and notifies other Federal agencies of significant events. The Ops Center remains staffed year-round (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 US Intelligence Community on medical intelligence and EP topics as they relate to COVID-19.
USNRC Daily running	
Staff	
Teleworking – 98% of staff	Mandatory telework (U.S. requirement). On March 16, 2020, the US Nuclear Regulatory Commission (NRC) began allowing full-time telework for all employees in its Headquarters and Regional offices, in response to the COVID-19 pandemic. 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.
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 require specific permissions for on-site work.
Material	
Personal computer	Staff are using NRC-issued laptops enabled with Skype, 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 very limited ability to process paper mail inquiries from the public during the COVID-19 public health emergency. The NRC continues to respond to phone calls and emails from the public.
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 public health emergency.
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. Social media highlights the occurrence of these meetings.