

EXEMPTION REQUEST COVER LETTER

[Licensee's letterhead]¹

[Date]

[Licensee's Letter number (optional)]

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

[Plant / Unit Name(s)]

[Docket No(s) [50-____, 50-____]]

Subject: Request for Pandemic Exemption

Pursuant to 10 CFR 50.12, *[license holder]* hereby requests *[cite the specific regulation(s) that warrants exemption, and include a brief summary of the supporting evaluation.]*

Approval of the proposed exemption is requested by *[need date, including justification]*.

[If regulatory commitments are made in the submittal, include here (or in a separate Enclosure) a listing of the formal licensee commitments that would apply if NRC approves the exemption. If no regulatory commitments are made, include a statement to that effect.]

If there are any questions or if additional information is needed, please contact *[licensee's point of contact]* at *[telephone number and/or email address.]*

Sincerely

[Signature]

[Name]

[Title, if not already included in the letterhead]

Enclosures:

- (1) Evaluation of the Proposed Pandemic Exemption
- (2) Commitments *[if applicable]*

cc: NRC Operations Center

¹ Italicized brackets represent information to be inserted by the applicant. Footnotes represent guidance – they are not part of the template.

Evaluation of the Proposed Pandemic Exemption

1. BACKGROUND

[Company] is the holder of Facility Operating License No(s). *[_____]*, which authorize(s) operation of the *[Plant/Unit Name(s)]*. The facility consists of *[number]* *[pressurized/boiling]* water reactor(s) located in *[County]*, *[State]*.

A pandemic condition warranting consideration of pandemic – based regulatory relief consistent with the criteria of the interim pandemic enforcement discretion policy was declared by *[identify the governmental entity declaring the condition]* on *[specify the date and approximate time]* by means of *[cite the official letter, e-mail, telephone call, or other means by which the plant management received notice of the pandemic condition]*.

2. EXEMPTION REQUEST

[Company] finds that exemption from the following regulatory requirement[s] is *[are]* necessary or may soon become necessary to enable continued operation of *[Plant/Unit Name(s)]* because pandemic-related staffing reductions are preventing or will soon prevent the requirement[s] from being satisfied. A limited-duration exemption would permit *[Plant/Unit Name(s)]* to continue supplying electric power to the regional grid for the duration of the pandemic in support of critical infrastructure (transportation, telecommunications, health care, etc.).

[List the requirement(s) for which exemption is being requested if staffing is reduced below normal minimum levels due to pandemic-related absenteeism. Include the following details:

- a. *Normal staffing level.*
- b. *Minimum staffing level permitted by the exemption.*
- c. *Expected duration of below-normal staffing.*
- d. *Maximum duration of below-normal staffing permitted by the exemption.*
- e. *Frequency of status reports to the NRC Operations Center.]*

Therefore, *[Company]* requests exemption as described above for *[Plant/Unit Name(s)]* in accordance the safety assessment in Section 3.

3. SAFETY ASSESSMENT

[Provide a detailed assessment of the safety impact of the proposed exemption. Factors to consider in the assessment:

- *Impact of continued plant operation on public health and safety (radiological safety)*
- *Impact of loss of the electric on public health and safety (infrastructure factors)*
- *Timing (need date)*
- *Cost factors*
- *Risk (PRA) factors*
- *Commitments*
- *Proprietary information*
- *Computer codes*
- *Test results*
- *Compensatory measures*

- *Technical data*
- *Precedent*
- *Temporary procedures*
- *Environmental impact]*

Therefore, consistent with the requirements of 10 CFR 50.12, the requested exemption[s]:

- b. will not present an undue risk to the public health and safety,
- c. is [are] consistent with the common defense and security, and
- d. is [are] in response to the following special circumstances:
 - (i) The exemption[s] would benefit the public health and safety by enabling [Plant/Unit Name(s)] to continue supplying electricity to the regional grid, which compensates for any small decrease in safety that may result from granting the exemption.
 - (ii) The exemption[s] would provide only temporary relief from the applicable regulation[s], and [Company] has made (and will continue to make) good faith efforts to comply with the regulation[s].
 - (iii) Operation under pandemic conditions was not considered when the regulation[s] was [were] adopted

4. CONCLUSIONS

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations to the maximum extent practicable, and (3) exemption will not be inimical to the common defense and security or to the health and safety of the public.

5. REFERENCES

[Identify and number all references used to prepare the proposed exemption. Cite each reference in this Enclosure ("Evaluation of Proposed Pandemic Exemption"). If a reference is needed to understand, review, or approve the proposed exemption, consider adding it to the submittal as an attachment, or submit it to the NRC under separate cover letter.]