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Subject: Exelon Nuclear COVID-19 Protocols

Exelon has implemented several safety protocols to mitigate COVID-19 spread, continues to seek additional safety measures, and adjusts safety measures based on the evolving nature of the pandemic. It is imperative all individuals working at Exelon facilities understand and follow these protocols to maintain workplace safety. Exelon appreciates and values your active engagement and support to ensure workplace safety.

The COVID-19 mitigation protocols include:

- pre-access COVID-19 travel screening
- pre-access COVID-19 temperature, symptom, and exposure screening
- proactive COVID-19 testing
- reactive COVID-19 testing
- COVID-19 personal protective equipment
- workplace disinfection and hygiene features and protocols, including handwashing or sanitizer stations
- social distancing configurations
- travel and commuting guidance

Exelon has documented these protocols, expectations and guidance in HR-AC-961 Infection Control in the Workplace During Epidemics and Pandemics, HR-AC-962 Screening and Sequestering Procedure for Communicable Diseases, and HR-AC-98 Travel Restrictions During Pandemics. To request a copy of these procedures, contact the Exelon Alliance or Supply organization, as applicable.

To ensure understanding and gain alignment between Exelon and our suppliers, an overview of some of Exelon's COVID-19 safety protocols is provided below. If there are questions on this process, Alliance Partners should contact Roosevelt Groves (Roosevelt.Groves@exeloncorp.com) and other Suppliers should contact Ryan FitzPatrick (Ryan.Fitz-Patrick@constellation.com).

Pre-Access COVID-19 Travel and Exposure Screening

Prior to arrival at the Exelon in-processing facility, all contract workers are required to complete a travel/exposure questionnaire. An electronic portal has been established and provided to all suppliers so that their respective contract workers can access and complete the questionnaire prior to arrival at site in-processing. The purpose of the questionnaire is to identify individuals coming from COVID-19 high-risk areas to assess workplace access restrictions and requirements and to comply with any

applicable state COVID-19 travel restrictions or requirements. Contract workers who do not complete the questionnaire prior to in-processing arrival will be required to complete a questionnaire immediately upon arriving at the Exelon in-processing facility. Completion prior to arrival is strongly encouraged to avoid delays and the potential that workplace access at Exelon sites may not be allowed and the individual turned away.

Contractors are reminded the COVID-19 safety precautions related to travel change often. Contractors are responsible for being up to date on the current status of any COVID-19 related travel restrictions and acting accordingly. By way of example, a CDC Travel Order effective January 26, 2021 requires all international travelers (excluding travelers from the U.S. territories) boarding an airplane destined for the U.S. provide a negative COVID-19 result from a test administered within three calendar days from the flight date or proof of recovery from COVID within the preceding 90 days. Upon entering the U.S. from a foreign country or a U.S. territory, CDC Guidance currently requires that the traveler quarantine for 10 days or obtain a negative test result from a test administered three to five days after entering the U.S. and quarantine for seven days. To be admitted to ExGen's nuclear sites, workers arriving from outside the US in the prior ten days will be required to show either proof of entry into the U.S. more than 10 days prior to arrival at the site or proof of entry at least seven to 10 days prior to arriving at the site and a negative result from a COVID-19 test administered to five days after entering the U.S. ExGen will not be responsible for any delay costs caused by failing to comply with applicable COVID-19 CDC and state and local travel orders and guidance.

Pre-Access COVID-19 Symptom and Exposure Screening

All Exelon facilities have pre-access screening stations to ensure individuals do not have symptoms including elevated body temperature, or recent exposure to COVID-19 positive individuals. The screening stations consist of a body temperature measuring station and posted symptom and exposure questions. The individual self performs the screening and the process relies on individuals thoughtfully and accurately answering the screening questions and defaulting to a conservative response. It also is expected that each individual asks themselves the screening questions and monitors his or her body temperature prior to arriving at the site every day. Again, if there is any doubt, the expectation is to default to a conservative response and notify Exelon Occupational Health Services (OHS) per the posted screening station instructions.

Proactive COVID-19 Testing

Proactive pre-access COVID-19 testing is required in support of refueling outages and designated projects. All contract workers who are temporarily assigned to work at an Exelon nuclear station for a refueling outage or designated project must participate in Exelon's COVID-19 testing program as a condition of being granted access to any Exelon sites. The proactive testing program is designed to identify asymptomatic individuals who test positive for COVID-19 to avoid interaction with others and/or further mitigate COVID-19 spread by implementing appropriate safety measures.

Exelon OHS administers the testing program. Testing will typically be performed upon arrival at the Exelon in-processing facility. Workers traveling to multiple Exelon sites without a break in service will be tested prior to leaving the current site to satisfy entrance testing for the next Exelon site.

Workers who have previously tested positive for COVID-19 and are no longer isolating or quarantined are required to bring documentation of the test and test results for OHS's review and determination as to whether Exelon testing is required.

Exelon OHS currently administers a polymerase chain reaction (PCR) diagnostic test to determine if an individual has COVID-19. The test specimen is sent to a third-party lab for processing. Exelon typically receives PCR test results within 36 to 48 hours after the test is administered. Contract workers will be sent offsite, at no cost to Exelon, until the results of the PCR diagnostic test are returned to Exelon OHS and the individual is cleared by Exelon OHS.

As an alternative, Exelon also is offering antibody testing during the PCR testing as an additional safety measure for determining site access while waiting for the PCR test results. Antibody test results are determined in real time by OHS. Antibody testing is voluntary. If a contract worker elects to take a real time antibody test at the same time as the administration of the PCR test and the antibody test is positive for IgG or does not show either IgG or IgM, Exelon OHS may, in its sole discretion, clear the worker to enter the site while waiting for the PCR test results and subject to heightened safety protocols for such individual. The "heightened safety protocols" include wearing a mask at all times and removing the mask ONLY when eating or drinking in a specific designated area and while maintaining six feet social distance. If the antibody test is positive for IgM, the contract worker will be sent offsite until the PCR test result is received and the contract worker is cleared by Exelon OHS. In some cases, antibody testing will be administered at the beginning and conclusion of in-processing activities, if sufficient time (i.e. two-day or longer in-processing duration) has elapsed to warrant another antibody test as an additional safety measure.

If a contract worker has completed or is in the midst of the COVID-19 vaccination process, it may preclude the use of antibody testing. In this scenario, the contract worker must provide Exelon OHS documentation of their vaccination status. If vaccination status precludes the use of antibody testing, Exelon OHS may, in its sole discretion, clear the worker to enter the site while waiting for the PCR test results and subject to heightened safety protocols for such worker as described above.

If the PCR test result is positive and Exelon does not have antibody test results or the antibody test results were positive for IgM, the contract worker will be required to quarantine per Exelon OHS recommendations <u>prior</u> to being considered for Exelon site access. If the PCR test result is positive and the contract worker took an antibody test and tested positive for IgG, Exelon OHS may conclude that the contract worker contracted COVID-19 sometime prior to the past 14 days and within the past 90 days but is no longer actively carrying the virus. In such circumstances, Exelon OHS may, in its discretion, approve the contract worker for access to Exelon's facilities despite the positive PCR test result.

In those cases when a contract worker is eligible for and decides not to take advantage of Exelon's additional safety measure at the time of initial testing (i.e., antibody testing) while awaiting or to further understand the PCR test results, the time the contract worker spends offsite while waiting for or following the PCR test results will be treated by Exelon as time during which it is not receiving services

from the contractor under the contract. Exelon will not reimburse or pay the supplier for any costs (including labor costs) the supplier incurs during that contract worker's wait time.

Contract workers who previously <u>tested positive</u> for COVID-19 in the 90-days before arrival at an Exelon site and who are no longer isolating, or quarantining are required to provide evidence of the test results to OHS to eliminate retest. In general, and within the sole discretion of Exelon OHS, a worker who tested positive using an FDA emergency use authorization (EUA) approved PCR test administered greater than 14 days and less than 90 days prior to arriving at Exelon in-processing and who is symptom free can be evaluated and may be allowed access to Exelon's sites without another PCR test.

COVID-19 Personal Protective Equipment

COVID-19 personal protective equipment (PPE) requirements are provided in SA-AA-116, Personal Protective Equipment (PPE), section 4.15, and SA-AA-116-F-01 Table A, PPE Matrix Selection Guidance. Copies of these procedures may be obtained from the Alliance or Supply organization, as applicable. In summary, individuals must wear Exelon approved PPE at all times when on Exelon property. The only exceptions to this requirement are while eating or drinking (as further described below), when working in complete isolation with no chance for accidental interaction with another individual (such as when working alone in an office with the door shut or when alone in a vehicle), and when transiting from/to the individual's vehicle at the beginning/end of work shift (as further described below). While eating or drinking, an individual must be at least six feet from others in all directions. When transiting to/from the individual's vehicle at the beginning or end of work shift, a cloth face covering may be used. The individual must don an Exelon approved face mask/shield upon entry to an Exelon facility. After the contract worker's first entry to the Exelon facility, Exelon expects that the Exelon approved PPE donned during the work shift and worn when leaving the site will then be used (if in acceptable condition) to enter an Exelon facility the following shift. Any questions on COVID-19 PPE should be directed to the Exelon Site Safety Advisor.

Workplace Disinfecting and Hygiene Features

Exelon has taken actions to ensure commonly touched surfaces are disinfected on a frequent basis to mitigate COVID-19 spread. This does not eliminate the need for individuals to demonstrate proper hygiene and workspace disinfecting. All individuals are responsible for frequently washing and disinfecting their hands. Hand sanitizer and/or hand washing stations are provided throughout the workplace to support hygiene measures. In addition, shared tools and equipment, including portable phones, desk phones, radios, keyboards, hand tools, shop equipment, iPads, etc., must be disinfected by the individual prior to and after use. Disinfecting wipes are provided for this purpose. Any questions on COVID-19 disinfecting expectations/protocols should be directed to the Exelon Site Safety Advisor.

Social Distancing

Exelon facilities have been configured and marked to support proper social distancing, i.e. six feet of separation in all directions. It is imperative that the configurations are maintained, and guidance is followed to avoid compromising social distancing. Moving tables, desks, chairs, barriers, etc. shall not be done without approval from the Exelon Site Safety Advisor. In areas where social distancing markings are not possible, it is incumbent upon individuals to maintain proper social distancing whenever possible.

Travel, Commuting and Offsite Activities

As noted above, Exelon requires its employees and all contract workers to comply with all Exelon COVID-19 safety protocols while on Exelon's sites. Exelon also expects that its suppliers require their respective employees and subcontractors to engage in appropriate behaviors to mitigate COVID-19 spread during the period of assignment at an Exelon facility by following all local, state and CDC recommendations and requirements while offsite, including while traveling and commuting to work at an Exelon site. Consistent with these recommendations and requirements, contract workers should not share housing or rooming accommodations or carpool with individuals outside of their immediate household. If carpooling cannot be avoided, individuals should wear a mask, disinfect common surfaces, and avoid sitting in the front next to the driver or having more than one person in the back seat. The CDC further strongly advises against sharing plates of food with others, eating from a buffet, eating in common areas or from common food containers or heating devices, using common dispensing items such as condiments and utensils, or congregating in groups. Additional CDC requirements include maintaining six feet social distancing, wearing a mask or face covering in public areas or when with others, and avoiding touching common surfaces with bare hands, such as credit card machines, grocery cart handles, elevator buttons, and doorknobs, without first disinfecting the surface. Exelon also expects that contract workers follow any applicable COVID-19 local or state safety orders.

If there are questions or additional information needed, please direct them to the Exelon Alliance, Supply or Safety organization, as applicable. They will work with Exelon Occupational Health Services and the Exelon Radiation Protection organizations to address questions.

Thank you for your continued support and commitment to workplace safety.

Timothy Hanley