Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609

January 18, 2000

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Mr. P. E. Fredrickson, Branch Chief
U.S. Nuclear Regulatory Commission
Region II
Atlanta Federal Center
61 Forsyth Street S.W.
Suite 23T85
Atlanta, Georgia 30303

Gentleman:

In the Matter of	)	Docket Nos.	50-259
Tennessee Valley Authority	)		50-260
			50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - RESPONSE TO 1999 EMERGENCY PREPAREDNESS (EP) EXERCISE DISCREPANCY IDENTIFIED IN NUCLEAR REGULATORY COMMISSION (NRC) INTEGRATED INSPECTION REPORT 50-259, 260, and 296/99-03

The purpose of this letter is to present TVA's views regarding a 1999 EP exercise discrepancy contained in NRC Integrated Inspection Report (IR) 99-03. In the Executive Summary of the inspection report, NRC noted "the second of the licensee's two protective action recommendations was erroneous, and constituted a failure to meet one of the established emergency preparedness exercise objectives." Furthermore, in section P.4.2, Plant Support, NRC noted that TVA failed to demonstrate Central Emergency Control Center (CECC) EP exercise objective D.4. Objective D.4 requires the CECC Director to provide the following four actions to the Alabama Department of Public Health (ADPH) personnel in a timely manner: (1) emergency classifications, (2) protective action recommendations, (3) plant conditions, and (4) dose assessment information.

The issue that led to the staff's conclusion was that Sector E5 of the BFN-5 mile emergency planning zone was omitted from a protective action recommendation. While TVA acknowledges that Sector E5 was not included in Notification Message

IE35

Number (NMN) 6 PAR, TVA believes that this omission was a result of extensive and thorough communications between TVA and ADPH personnel.

At 1206 hours, NMN 4 PAR was provided to ADPH personnel based on the prevailing wind direction. However, at this time, ADPH personnel had used wind projections for 1300 hours (see the enclosed letter from the ADPH). As a result of the use of a different wind direction, ADPH personnel evacuated Sector E5. Extensive discussions occurred between TVA CECC staff and ADPH personnel to resolve this problem. Following the resolution of the problem, ADPH personnel began to use the meteorological data which coincided with the progress of the exercise scenario.

At approximately 1225 hours, TVA provided another PAR which did not include the evacuation of Sector E5. Having the foreknowledge that ADPH personnel had evacuated Sector E5, 19 minutes before, a deliberate, well researched PAR which did not include Sector E5 was provided in NMN 6 in a timely manner.

Since NMN 6 did not include the evacuation of Sector E5, NRC construed this decision as a deviation from CECC Emergency Plan Implementing Procedure (EPIP)-1, Revision 27. Step 6.2.3 of the procedure states, in part, "The CECC Director is responsible for making appropriate public protective action recommendations to State authorities."

As can be seen from the above, the omission of evacuating Sector E5 in NMN 6 did not constitute a failure to meet the exercise objective CECC, D.4.

First, CECC objective D.4 is multifaceted in nature, and, as such, a perceived PAR oversight should not represent a total failure to successfully perform the objective.

Secondly, NRC Inspection Procedure 82301, Evaluation Of Exercises For Power Reactors, provides guidance to ensure that protective action decision making in the CECC considers evacuation time estimates. The 1225 hour protective action decision did consider the ADPH's evacuation of Sector E5.

Therefore, the requirements and intent of procedure CECC EPIP-1 were met. The decision of the CECC Director not to include the evacuation of Sector E5 in NMN 6 did not impact the response of ADPH personnel during the exercise. Thirdly, the inspection report noted: (1) offsite notifications of emergency classifications were made in a timely manner, (2) protective action recommendations were satisfactorily researched prior to providing a recommendation to ADPH personnel, and (3) the identified discrepancy (i.e., not recommending evacuation of Sector E5 in a protective action recommendations (PAR)) would not have adversely affected the public health and safety in a real emergency because ADPH personnel had previously ordered the evacuation of that sector.

Finally, the enclosed letter from the ADPH clearly supports the conclusion that communications between the CECC staff and ADPH personnel were excellent and there was no confusion with the State decision makers. Therefore, TVA concludes that CECC objective D.4 was met and no deficiency should have been reported. Reporting this deficiency in IR 99-03 as a total failure to meet CECC objective D.4 does not appear to meet the intent of the guidance in NRC Inspection Procedure 82301.

There are no commitments contained in this letter. If you have any questions please contact me at (256) 729-2636.

Sincerely,

T. E. Abney
Manager of Site Licensing
and Industry Affairs

cc: See page 4

Enclosure
cc (Enclosure):

Mr. William O. Long, Senior Project Manager
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Rockville, Maryland 20852

U.S. Nuclear Regulatory Commission
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NRC Resident Inspector
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10833 Shaw Road
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D. E. Williamson, M.D., State Health Officer
State Of Alabama Department OF Public Health
The RSA Tower
210 Monroe Street
Montgomery, AL 36130-3017

ENCLOSURE

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT

SUPPORTING LETTER FROM STATE OF ALABAMA

(See Attached)

STATE OF ALABAMA DEPARTMENT OF
PUBLIC HEALTH
Donald E. Williamson, MD
State Health Officer

September 3, 1999

Ronnie Kitts
Tennessee Valley Authority
1101 Market Street
Chattanooga, Tennessee 37402-2801

Dear Mr. Kitts:

I would like to offer my comments regarding the difference in protective action recommended by the CECC and the action ordered by the State of Alabama Department of Public Health during the May 26, 1999 exercise.

In follow-up discussions with staff, there appears to have been some miscommunication in interpreting the scenario weather forecast timeline. Specifically, did timelines represent actual time or post accident time? This was an artificial problem created by using scenario weather. Had "real weather forecasts" been used, I believe that this problem would have been avoided.

Based upon information available at the time and our interpretation of that information the State decided to include Sector E-5 in evacuation order number 004 issued at 1206 and not include Sector A-5 as recommended by CECC. At 1208 I discussed the order with the CECC director. At that time it was discovered that scenario weather was not being interpreted the same. After discussing the matter with the meteorologist in the CECC, a new order, evacuation order number 006, was issued at 1225, only seventeen minutes from the issuance of order number 004.

Sector E-5 was ordered to be evacuated at 1206 and this was communicated to the CECC by telephone and fax. The fact that Sector E-5 was not included in later CECC recommendations in no way affected decisions made by the State of Alabama. Although no formal recommendation was made to evacuate Sector E-5 by CECC, both the CECC and the State were aware that Sector E-5 had been ordered evacuated at 1206. This in no way caused any confusion with state decision makers. Neither would it have placed citizens in Sector E-5 in any danger in a real emergency.

A review of exercise notes indicates that communication between the CECC and the State of Alabama Radiation Control was excellent. There were lengthy discussions of issues and subsequent actions taken based upon those discussions.

The RSA Tower • 201 Monroe Street • Montgomery, AL 36104
P.O. Box 303017 • Montgomery, AL 36130-3017

The efforts made by you and the entire TVA staff in making sure that the citizens of this State will be protected in the event of an accident at Browns Ferry Nuclear Plant are recognized and appreciated.

Sincerely,

Kirksey E. Whatley

Kirksey E. Whatley, Director
Office of Radiation Control

KEW/mwf