

SAFEGUARDS INFORMATION

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

Mike D. Skaggs  
Vice President, Browns Ferry Nuclear Plant

May 26, 2005  
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville Maryland 20852

ICM B.5.b

Dear Gentlemen:

In the Matter of ) Docket No. 50-259  
Tennessee Valley Authority ) 50-260  
50-296

**BROWNS FERRY NUCLEAR PLANT (BFN) UNIT 1, 2, AND 3 - RESPONSE TO NRC GUIDANCE REGARDING MITIGATION STRATEGIES**

The NRC issued Orders For Interim Safeguards and Security Compensatory Measures ("Order EA-02-026" or "ICM Order") dated February 25, 2002.

Order EA-02-026 imposed requirements on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order required licensees to implement certain changes in physical security plans and safeguards contingency plans on an interim basis until final requirements were established. Among other requirements, TVA submitted its response to Section II.B.5.b. of Order EA-02-026 on August 31, 2002.

Subsequently, the NRC issued Orders, dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors ("Order EA-03-086" or "DBT Order") and other security related Orders (collectively "Orders") for the [Nuclear Power Plant]. In many ways, Order EA-03-086 complemented or superseded requirements the interim measures imposed by Order EA-02-026.

SAFEGUARDS INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ATTACHMENTS.

REVIEWED CLASSIFICATION  
NAME *Rough & Croft*  
TITLE *Security Field Support*  
ORGANIZATION *Security*  
DATE *May 26, 2005*

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As required by Order EA-03-086, the plans for BFN have been implemented. Subsequently, TVA was requested to respond to the letter from Mr. J. E. Dyer, Director, Office of Nuclear Regulation, dated February 25, 2005, NRC Staff Guidance for Use in Achieving Satisfactory Compliance with February 25, 2002, Order Section B.5.b, (NRC B.5.b Guidance) by May 31, 2005, and to implement appropriate enhancement to current mitigation strategies by August 31, 2005.

Specifically, nuclear power plant licensees were requested by Enclosure 2, Developing Mitigating Strategies/Guidance for Nuclear Power Plants to Respond to Loss of Large Areas of the Plant in Accordance with B.5.b of the February 25, 2002, Order (dated February 24, 2005) (NRC B.5.b Guidance), to the February 25, 2005, letter to review the Areas of Consideration delineated in Attachment A to that Enclosure and evaluate additional considerations for potential inclusion in the licensees' mitigating strategies that licensees deemed appropriate in accordance to Attachment B to that enclosure.

Subsequently, the Nuclear Energy Institute (NEI), in conjunction with the NEI Security Working Group, developed and issued guidance for licensee use (NEI Guidance) to assist licensees in responding to the February 25, 2005, letter.

As requested in the February 25, 2005, letter, TVA has reviewed the information in Attachments A and B in accordance with the NEI Guidance and is hereby submitting, as a Safeguards Information attachment to this letter (Enclosure 1), TVA's evaluation of the information the NRC provided. Enclosure 1 reflects the results of a comprehensive and thorough review of the guidance and describes the considerations that TVA either has already or intends to implement at BFN by August 31, 2005.

The primary guiding principles used in the conduct of this evaluation were (1) whether or not equipment and resources were "readily available," and (2) if equipment is readily available, can it be effectively utilized in a licensee's mitigating strategy.

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TVA considered "readily available" to mean that the equipment or resources was already licensee owned, under contract, or part of an existing Memorandum of Understanding. Further, even if equipment and resources are readily available, U.S. Nuclear Regulatory Commission the second criterion is to ensure that the equipment can be used in a mitigating strategy in an effective manner. Even if the equipment is readily available, it is of no value if it cannot be effective in implementing the mitigating strategy.

In accordance with these principles, actions are being implemented to address the NRC B.5.b Guidance. These actions are considered to be commitments for that purpose and will be managed in accordance with TVA's commitment management system.

Enclosure 2 to this letter contains TVA's commitment to complete the actions regarding the implementation of the mitigative strategies to address NRC B.5.b Guidance.

If you have any questions, please telephone Mr. D. T. Langley at (256) 729-3612.

Sincerely,

  
Mike D. Skaggs

Enclosures  
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cc Enclosures: (w/o)  
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