~~SECURITY-RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390~~

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

November 23, 2009

10 CFR 50.90
10 CFR 50.4

TS-470

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Facility Operating License Nos. DPR-33, DPR-52 and DPR-68
NRC Docket Nos. 50-259, 50-260 and 50-296

Subject: **Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan**

Reference: Letter from Nuclear Energy Institute to NRC, "Endorsement of NEI 08-09, Cyber Security Plan for Nuclear Power Reactors, Revision 3," dated September 15, 2009

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," the Tennessee Valley Authority (TVA) is submitting a request for an amendment to Licenses DPR-33, DPR-52, and DPR-68 for Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3, respectively.

As required by 10 CFR 73.54, "Protection of digital computer and communication systems and networks," this proposed amendment requests NRC approval of the Browns Ferry Nuclear Plant Cyber Security Plan, provides an Implementation Schedule, and adds a sentence to the existing Licenses' Physical Protection license conditions to require BFN Units 1, 2, and 3 to fully implement and maintain in effect all provisions of the Commission approved Cyber Security Plan.

SECURITY-RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

S001
NRR

Printed on recycled paper

This proposed amendment conforms to the model application provided to the NRC by the referenced letter.

Enclosure 1 provides an evaluation of the proposed change. Enclosure 1 also contains the following attachments:

- Attachment 1 provides the existing Facility Operating License pages marked up to show the proposed change for BFN Units 1, 2, and 3.
- Attachment 2 provides the proposed Facility Operating License changes in final typed format for BFN Units 1, 2 and 3

Enclosure 2 provides a copy of the Browns Ferry Nuclear Plant Cyber Security Plan Implementation Schedule. Implementation of the Browns Ferry Nuclear Plant Cyber Security Plan will be in accordance with this implementation schedule. TVA requests that Enclosure 2, which contains sensitive information, be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding."

Enclosure 3 provides a copy of the Browns Ferry Nuclear Plant Cyber Security Plan which is a standalone document that will be incorporated by reference into the Browns Ferry Nuclear Plant Physical Security Plan upon approval. TVA requests that Enclosure 3, which contains sensitive information, be withheld from public disclosure in accordance with 10 CFR 2.390. Consistent with common licensing practice, the Cyber Security Plan is written in the present tense, including discussions of procedures, processes and programs associated with cyber security that are not yet implemented. The Cyber Security Plan, including the associated procedures, processes and programs, will be implemented in accordance with the implementation schedule provided in Enclosure 2.

In accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter, with Enclosure 1, to the designated Alabama state official. Since Enclosures 2 and 3 contain security-related information, they will be made available for review on site, as necessary.

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

TVA requests an implementation period in accordance with the implementation schedule provided in Enclosure 2 of this letter.

There are no regulatory commitments associated with this license amendment request.

If you should have any questions regarding this submittal, please contact Fred Mashburn at (423) 751-8817.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 23rd day of November, 2009.

Respectfully,

R. M. Krich
Vice President
Nuclear Licensing

Enclosure 1: Evaluation of Proposed Change
Enclosure 2: Browns Ferry Nuclear Plant Cyber Security Plan Implementation Schedule
Enclosure 3: Browns Ferry Nuclear Plant Cyber Security Plan

cc: (Enclosures):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant
State Health Officer – Alabama Department of Public Health (w/o Enclosures 2 and 3)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

bcc (Enclosures):

NRC Project Manager – Browns Ferry Nuclear Plant
NRC Branch Chief – Region II
EDMS, WT CA-K

bcc (w/o Enclosures):

S. M. Bono, SAB 1A-BFN
T. J. Bradshaw (NSRB Support), LP 4K-C
F. R. Godwin, SAB 2B-BFN
D. E. Grissette, NAB-1A-BFN
N. T. Henrich, MP 5G-C
D. E. Jernigan, LP 3R-C
F. C. Mashburn, LP 4K-C
J. H. McCarthy, NAB 1A-BFN
J. J. Randich, POB 2C-BFN
P. D. Swafford, LP 3R-C
E. J. Vigluicci, WT 6A-K
R. G. West, NAB 2A-BFN
R. J. Whalen, 3R-C

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

Enclosure 1

Evaluation of Proposed Change

Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan

1.0 Summary Description
2.0 Detailed Description
3.0 Technical Evaluation
4.0 Regulatory Evaluation
4.1 Applicable Regulatory Requirements / Criteria
4.2 Significant Hazards Consideration
5.0 Environmental Consideration
6.0 References

ATTACHMENTS

Attachment 1 - Proposed Facility Operating License Changes (Marked-Up)
Attachment 2 – Proposed Facility Operating License Changes (Re-Typed)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

1.0 SUMMARY DESCRIPTION

The proposed license amendment request (LAR) includes the proposed Browns Ferry Nuclear Plant Cyber Security Plan (Plan), an Implementation Schedule, and a proposed sentence to be added to the existing operating licenses' Physical Protection license conditions for Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3.

2.0 DETAILED DESCRIPTION

The proposed license amendment request (LAR) includes three parts: the proposed Plan, an Implementation Schedule, and a proposed sentence to be added to the existing Facility Operating Licenses (FOLs) Physical Protection license condition to require BFN Units 1, 2, and 3 to fully implement and maintain in effect all provisions of the Commission approved cyber security plan as required by 10 CFR 73.54, "Protection of digital computer and communication systems and networks." On March 27, 2009, the Federal Register notice issued the final rule that amended 10 CFR Part 73, "Physical Protection of Plants and Materials." The regulations in 10 CFR 73.54 establish the requirements for a cyber security program. This regulation specifically requires each licensee currently licensed to operate a nuclear power plant under Part 50 of this chapter to submit a cyber security plan that satisfies the requirements of the Rule. Each submittal must include a proposed implementation schedule and implementation of the licensee's cyber security program must be consistent with the approved schedule. The background for this application is addressed by the NRC Notice of Availability published on March 27, 2009, 74 FR 13926 (Reference 6.1).

3.0 TECHNICAL EVALUATION

Federal Register notice 74 FR 13926 issued the final rule that amended 10 CFR Part 73. Cyber security requirements are codified as new 10 CFR 73.54 and are designed to provide high assurance that digital computer and communication systems and networks are adequately

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

protected against cyber attacks up to and including the design basis threat established by 10 CFR 73.1(a)(1(v). These requirements are substantial improvements upon the requirements imposed by EA-02-026 (Reference 6.2).

NEI 08-09, "Cyber Security Plan Template," provides an approach for complying with the Commission's regulations for protecting digital computers, communications systems, and networks. NEI 08-09 has been submitted to the NRC (Reference 6.3) for use by licensees in development of their own cyber security plans. The Browns Ferry Nuclear Plant Cyber Security Plan is in accordance with NEI 08-09 (Reference 6.3) with the exception that Appendix A, Table 1, "Systems Within the Scope of 10 CFR 73.54," and the associated references to Table 1 have not been included in the Cyber Security Plan. The removal of Table 1 was based on NRC feedback and is considered acceptable since the Table 1 listing of systems within the scope of 10 CFR 73.54 will be available for inspection on site.

This LAR includes the proposed Plan (Enclosure 3) that conforms to the template provided in NEI 08-09. In addition the LAR includes the proposed change to the existing FOLs license conditions for "Physical Protection" (Attachments 1 and 2) for BFN Units 1, 2 and 3. Finally, the LAR contains the proposed Implementation Schedule (Enclosure 2) as required by 10 CFR 73.54.

4.0 REGULATORY EVALUATION

4.1 APPLICABLE REGULATORY REQUIREMENTS / CRITERIA

This LAR is submitted pursuant to 10 CFR 73.54 which requires licensees currently licensed to operate a nuclear power plant under 10 CFR 50 to submit a Cyber Security Plan as specified in 10 CFR 50.4, "Written communications," and 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit."

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

4.2 SIGNIFICANT HAZARDS CONSIDERATION

The TVA has evaluated the proposed changes using the criteria in 10 CFR 50.92, "Issuance of amendment," and has determined that the proposed changes do not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

Criterion 1: The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is required by 10 CFR 73.54 and includes three parts. The first part is the submittal of the Plan for NRC review and approval. The Plan conforms to the template provided in NEI 08-09 and provides a description of how the requirements of the Rule will be implemented at BFN Units 1, 2, and 3. The Plan establishes the licensing basis for the Browns Ferry Nuclear Plant Cyber Security Program for BFN Units 1, 2, and 3. The Plan establishes how to achieve high assurance that nuclear power plant digital computer and communication systems and networks associated with the following are adequately protected against cyber attacks up to and including the design basis threat:

1. Safety-related and important-to-safety functions,
2. Security functions,
3. Emergency preparedness functions including offsite communications, and
4. Support systems and equipment which if compromised, would adversely impact safety, security, or emergency preparedness functions.

Part one of the proposed change is designed to achieve high assurance that the systems are protected from cyber attacks. The Plan itself does not require any plant modifications. However, the Plan does describe how plant modifications which involve digital computer systems are reviewed to provide high assurance of adequate protection against cyber attacks, up to and including the design basis threat as defined in the Rule. The proposed change does not alter the plant configuration, require new plant equipment to be installed, alter accident

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

analysis assumptions, add any initiators, or effect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The first part of the proposed change is designed to achieve high assurance that the systems within the scope of the Rule are protected from cyber attacks and has no impact on the probability or consequences of an accident previously evaluated.

The second part of the proposed change is an Implementation Schedule. The third part adds a sentence to the existing FOLs license conditions for Physical Protection for BFN Units 1, 2, and 3. Both of these changes are administrative and have no impact on the probability or consequences of an accident previously evaluated.

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2: The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change is required by 10 CFR 73.54 and includes three parts. The first part is the submittal of the Plan for NRC review and approval. The Plan conforms to the template provided by NEI 08-09 and provides a description of how the requirements of the Rule will be implemented at Browns Ferry Units 1, 2, and 3. The Plan establishes the licensing basis for the Browns Ferry Nuclear Plant Cyber Security Program for BFN Units 1, 2 and 3. The Plan establishes how to achieve high assurance that nuclear power plant digital computer and communication systems and networks associated with the following are adequately protected against cyber attacks up to and including the design basis threat:

1. Safety-related and important-to-safety functions,
2. Security functions,
3. Emergency preparedness functions including offsite communications, and
4. Support systems and equipment which if compromised, would adversely impact safety, security, or emergency preparedness functions.

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

Part one of the proposed change is designed to achieve high assurance that the systems within the scope of the Rule are protected from cyber attacks. The Plan itself does not require any plant modifications. However, the Plan does describe how plant modifications involving digital computer systems are reviewed to provide high assurance of adequate protection against cyber attacks, up to and including the design basis threat defined in the Rule. The proposed change does not alter the plant configuration, require new plant equipment to be installed, alter accident analysis assumptions, add any initiators, or effect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected. The first part of the proposed change is designed to achieve high assurance that the systems within the scope of the Rule are protected from cyber attacks and does not create the possibility of a new or different kind of accident from any previously evaluated.

The second part of the proposed change is an Implementation Schedule. The third part adds a sentence to the existing FOLs license conditions for Physical Protection for BFN Units 1, 2, and 3. Both of these changes are administrative and do not create the possibility of a new or different kind of accident from any previously evaluated.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3: The proposed change does not involve a significant reduction in a margin of safety.

The proposed change is required by 10 CFR 73.54 and includes three parts. The first part is the submittal of the Plan for NRC review and approval. The Plan conforms to the template provided by NEI 08-09 and provides a description of how the requirements of the Rule will be implemented at BFN Units 1, 2, and 3. The Plan establishes the licensing basis for the Browns Ferry Nuclear Plant Cyber Security Program for BFN Units 1, 2, and 3. The Plan establishes how to achieve high assurance that nuclear power plant digital computer and communication

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

systems and networks associated with the following are adequately protected against cyber attacks up to and including the design basis threat:

1. Safety-related and important-to-safety functions,
2. Security functions,
3. Emergency preparedness functions including offsite communications, and
4. Support systems and equipment which if compromised, would adversely impact safety, security, or emergency preparedness functions.

Part one of the proposed change is designed to achieve high assurance that the systems within the scope of the Rule are protected from cyber attacks. Plant safety margins are established through Limiting Conditions for Operation, Limiting Safety System Settings and Safety limits specified in the Technical Specifications. Because there is no change to these established safety margins, the proposed change does not involve a significant reduction in a margin of safety.

The second part of the proposed change is an Implementation Schedule. The third part adds a sentence to the existing FOLs license conditions for Physical Protection for BFN Units 1, 2, and 3. Both of these changes are administrative and do not involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, the TVA concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.

4.3 CONCLUSION

In conclusion, 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

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed amendment establishes the licensing basis for a Cyber Security Program for BFN Units 1, 2, and 3 and will be a part of the Physical Security Plan. This proposed amendment will not involve any significant construction impacts. Pursuant to 10 CFR 51.22(c)(12) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 REFERENCES

1. Federal Register Notice, Final Rule 10 CFR Part 73, Power Reactor Security Requirements, published on March 27, 2009, 74 FR 13926.
2. EA-02-026, Order Modifying Licenses; Safeguards and Security Plan Requirements, issued February 25, 2002.
3. Letter from Nuclear Energy Institute to NRC, "Endorsement of NEI 08-09, Cyber Security Plan for Nuclear Power Reactors, Revision 3," dated September 15, 2009.

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

Attachment 1

Proposed Facility Operating License Change (Marked-Up)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

Browns Ferry Nuclear Plant, Unit 1

Proposed Facility Operating License Change (Marked-Up)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.

INSERT (a)

(12) Deleted.

(13) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(14) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(15) The licensee is required to confirm that the conclusions made in TVA's letter dated September 17, 2004, for the turbine building remain acceptable using seismic demand accelerations based on dynamic seismic analysis prior to the restart of Unit 1.

(16) Upon implementation of Amendment No. 275, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), the assessment of the CRE habitability as required by TS 5.5.13.c.(ii), and the measure of CRE pressure as required by TS 5.5.13.d, shall be considered met.

INSERT

(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

Browns Ferry Nuclear Plant, Unit 2

Proposed Facility Operating License Change (Marked-Up)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.

INSERT (a)

(12) Deleted.

(13) Deleted.

(14) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(15) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(16) Upon complementation of Amendment No. 302, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of CRE pressure as required by TS 5.5.13.d, shall be considered met.

INSERT

(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

Browns Ferry Nuclear Plant, Unit 3

Proposed Facility Operating License Change (Marked-Up)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(3) The licensee is authorized to relocate certain requirements included in Appendix A and the former Appendix B to licensee-controlled documents. Implementation of this amendment shall include the relocation of these requirements to the appropriate documents, as described in the licensee's application dated September 6, 1996; as supplemented May 1, August 14, November 5 and 14, December 3, 4, 11, 22, 23, 29, and 30, 1997; January 23, March 12, April 16, 20, and 28, May 7, 14, 19, and 27, and June 2, 5, 10 and 19, 1998; evaluated in the NRC staff's Safety Evaluation enclosed with this amendment. This amendment is effective immediately and shall be implemented within 90 days of the date of this amendment.

(4) Deleted.

(5) Classroom and simulator training on all power uprate related changes that affect operator performance will be conducted prior to operating at uprated conditions. Simulator changes that are consistent with power uprate conditions will be made and simulator fidelity will be validated in accordance with ANSI/ANS 3.5-1985. Training and the plant simulator will be modified, as necessary, to incorporate changes identified during startup testing. This amendment is effective immediately.

(6) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," Revision 4, submitted by letter dated April 28, 2006.

INSERT (a)

(7) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(8) Deleted.

INSERT

(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

(9) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(10) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:
1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:
1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
2. Dose to onsite responders

(11) The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

(12) Upon completion of Amendment No. 261, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of the CRE pressure as required by TS 5.5.13.d, shall be considered met.

Attachment 2

Proposed Facility Operating License Change (Re-Typed)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

Browns Ferry Nuclear Plant, Unit 1

Proposed Facility Operating License Change (Re-Typed)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.

(11)(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

(12) Deleted.

(13) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(14) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(15) The licensee is required to confirm that the conclusions made in TVA's letter dated September 17, 2004, for the turbine building remain acceptable using seismic demand accelerations based on dynamic seismic analysis prior to the restart of Unit 1.

(16) Upon implementation of Amendment No. 275, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c.(i), the assessment of the CRE habitability as required by TS 5.5.13.c.(ii), and the measure of CRE pressure as required by TS 5.5.13.d, shall be considered met.

Browns Ferry Nuclear Plant, Unit 2

Proposed Facility Operating License Change (Re-Typed)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(8) Deleted.

(9) Deleted.

(10) Deleted.

(11)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.

(11)(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

(12) Deleted.

(13) Deleted.

(14) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(15) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(16) Upon complementation of Amendment No. 302, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of CRE pressure as required by TS 5.5.13.d, shall be considered met.

Browns Ferry Nuclear Plant, Unit 3

Proposed Facility Operating License Change (Re-Typed)

ENCLOSURES 2 AND 3 TO THIS LETTER CONTAIN SECURITY-RELATED INFORMATION. SECURITY-RELATED INFORMATION CLASSIFICATION DOES NOT APPLY TO THIS PAGE WHEN SEPARATED FROM ENCLOSURES 2 AND 3.

(3) The licensee is authorized to relocate certain requirements included in Appendix A and the former Appendix B to licensee-controlled documents. Implementation of this amendment shall include the relocation of these requirements to the appropriate documents, as described in the licensee's application dated September 6, 1996; as supplemented May 1, August 14, November 5 and 14, December 3, 4, 11, 22, 23, 29, and 30, 1997; January 23, March 12, April 16, 20, and 28, May 7, 14, 19, and 27, and June 2, 5, 10 and 19, 1998; evaluated in the NRC staff's Safety Evaluation enclosed with this amendment. This amendment is effective immediately and shall be implemented within 90 days of the date of this amendment.

(4) Deleted.

(5) Classroom and simulator training on all power uprate related changes that affect operator performance will be conducted prior to operating at uprated conditions. Simulator changes that are consistent with power uprate conditions will be made and simulator fidelity will be validated in accordance with ANSI/ANS 3.5-1985. Training and the plant simulator will be modified, as necessary, to incorporate changes identified during startup testing. This amendment is effective immediately.

(6)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," Revision 4, submitted by letter dated April 28, 2006.

(6)(b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved Browns Ferry Nuclear Plant Cyber Security Plan submitted by letter dated November 23, 2009, and withheld from public disclosure in accordance with 10 CFR 2.390.

(7) Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Final Safety Analysis Report for BFN as approved in the safety evaluations dated December 8, 1988; March 31, 1993; April 1, 1993; November 2, 1995; April 25, 2007, and Supplement dated November 3, 1989; subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

(8) Deleted.

(9) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).

(10) Mitigation Strategy License Condition

Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:

(a) Fire fighting response strategy with the following elements:
1. Pre-defined coordinated fire response strategy and guidance
2. Assessment of mutual aid fire fighting assets
3. Designated staging areas for equipment and materials
4. Command and control
5. Training of response personnel

(b) Operations to mitigate fuel damage considering the following:
1. Protection and use of personnel assets
2. Communications
3. Minimizing fire spread
4. Procedures for implementing integrated fire response strategy
5. Identification of readily-available pre-staged equipment
6. Training on integrated fire response strategy
7. Spent fuel pool mitigation measures

(c) Actions to minimize release to include consideration of:
1. Water spray scrubbing
2. Dose to onsite responders

(11) The licensee shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan and/or guard training and qualification plan, as appropriate.

(12) Upon completion of Amendment No. 261, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measurement of the CRE pressure as required by TS 5.5.13.d, shall be considered met.