



Tennessee Valley Authority
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R. M. Krich
Vice President
Nuclear Licensing

October 29, 2010

10 CFR 50.4

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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: **Supplemental Information Related to the Reply to Notice of Violation;
EA-09-307**

- References:
1. Letter from NRC to TVA, "Final Significance Determination of Yellow and White Findings and Notice of Violation (NRC Inspection Report Nos. 05000259/2010007, 05000260/2010007 and 05000296/2010007), Browns Ferry Nuclear Plant," dated April 19, 2010
 2. Letter from TVA to NRC, "Reply to Notice of Violation; EA-09-307," dated May 18, 2010
 3. Letter from NRC to TVA, "Reply to Tennessee Valley Authority Letter Dated May 18, 2010, Regarding Inspection Report No. 05000259/2010007, 05000260/2010007, and 05000296/2010007, Browns Ferry Nuclear Plant," dated June 17, 2010
 4. Letter from TVA to NRC, "Updated Reply to Notice of Violation; EA-09-307," dated October 7, 2010

In the updated reply to Notice of Violation (NOV) EA-09-307 (Reference 4), the Tennessee Valley Authority (TVA) noted specific corrective actions to address the Appendix R fire protection issues at Browns Ferry Nuclear Plant (BFN) cited in the NOV. The primary corrective action committed to by TVA in this response is implementation of National Fire Protection Association (NFPA) Standard 805, in accordance with 10 CFR 50.48. However, TVA plans to submit the license amendment request for the transition to NFPA 805 no later than March 4, 2012. During the recent NRC team inspection carried out pursuant to NRC Inspection Procedure Section 95002, the team reviewed TVA's causes and corrective actions listed in our reply to the NOV.

IEDI
NRC

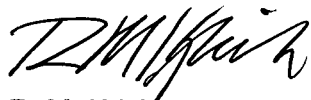
The purpose of this letter is to provide supplemental information regarding actions being taken to support the corrective actions being taken to address the NOV. These actions were discussed with the NRC 95002 inspection team leader.

Accordingly, TVA has implemented an Appendix R 95002 Task Force. The Appendix R 95002 Task Force is a group sponsored by TVA Nuclear Power Group senior management that is tasked with meeting the following objectives:

- Maintain the Task Force through completion of all root cause analysis corrective actions.
- Return and maintain the Fire Protection System to excellent materiel and system health conditions.
- Minimize fire impairments.
- Continue to reduce risk and improve safety margin on the Fire Protection System.
- Close 95002 self-assessment corrective actions and perform independent review of the action closures.
- Complete the root cause corrective actions as scheduled.
- Verify the accuracy and adequacy of completed 95002 actions items.
 - Utilize a 95002 Problem Evaluation Report action verification form
 - Utilize a closure review board
 - Perform quarterly Quality Assurance assessments of corrective actions
- Implement semi-annual effectiveness review challenge boards by TVA Nuclear management. Challenge board members may include Executive Sponsor; Vice President, Nuclear Licensing; Site Vice President; 95002 Project Manager; Quality Assurance Manager; and others as required.
- Routinely update NRC Region II management on progress and status of meeting the Task Force objectives.

There is one new regulatory commitment contained in this letter, as identified in the enclosure. Should you have any questions concerning this submittal, please contact James Emens at (256) 729-2636.

Respectfully,



R. M. Krich

Enclosure: Regulatory Commitment

cc (Enclosure):

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant

bcc (Enclosure):

NRC Project Manager - Browns Ferry Nuclear Plant
NRC Branch Chief - Region II
G. P. Arent
K. W. Brown
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D. E. Jernigan
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EDMS

ENCLOSURE

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3

SUPPLEMENTAL REPLY TO NOTICE OF VIOLATION; EA-09-307

REGULATORY COMMITMENT

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- Return and maintain the Fire Protection System to excellent materiel and system health conditions.
- Minimize fire impairments.
- Continue to reduce risk and improve safety margin on the Fire Protection System.
- Close 95002 self-assessment corrective actions and perform independent review of the action closures.
- Complete the root cause corrective actions as scheduled.
- Verify the accuracy and adequacy of completed 95002 actions items.
 - Utilize a 95002 Problem Evaluation Report action verification form
 - Utilize a closure review board
 - Perform quarterly Quality Assurance assessments of corrective actions
- Implement semi-annual effectiveness review challenge boards by TVA Nuclear management. Challenge board members may include Executive Sponsor; Vice President, Nuclear Licensing; Site Vice President; 95002 Project Manager; Quality Assurance Manager; and others as required.
- Routinely update NRC Region II management on progress and status of meeting the Task Force objectives.