



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

January 13, 2012

10 CFR 50.4

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

Browns Ferry Nuclear Plant (BFN), 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: Revised Submittal Schedule for License Amendment Request to Adopt National Fire Protection Association (NFPA) 805, Performance-Based Standard for Fire Protection For Light Water Reactor Generating Plants, 2001 Edition for Browns Ferry Nuclear Plant Units 1, 2, and 3

- Reference:
1. Letter from TVA to NRC, Browns Ferry Nuclear Plant (BFN) - Units 1, 2, and 3 - Letter of Intent to Adopt National Fire Protection Association (NFPA) 805, Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition, dated March 4, 2009.
 2. Letter from TVA to NRC, Supplemental Information Related to the Reply to Notice of Violation; EA-09-307, dated October 29, 2010.

The purpose of this letter is to inform the NRC of the revised Tennessee Valley Authority (TVA) schedule for submitting an application to adopt the NFPA Standard 805 for the Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3. By letter dated March 4, 2009 (Reference 1), TVA informed the NRC of plans to submit a license amendment request to adopt NFPA Standard 805, Performance-Based Standard for Fire Protection For Light Water Reactor Generating Plants, within approximately three years of the reference letter.

At a public meeting between the NRC staff and TVA representatives on December 8, 2011, TVA described the strategy it has pursued of performing modifications to the BFN and its associated procedures in parallel with development of a license amendment request to adopt NFPA Standard 805. The objective of the parallel approach has been to achieve meaningful reduction in fire risk at BFN while pursuing the improved regulatory basis provided by NFPA Standard 805. As discussed at the December 8, 2011, meeting, TVA has completed several key modifications to the facility that have improved risk and substantially reduced the number of time critical operator manual actions required to implement the current safe shutdown fire strategy.

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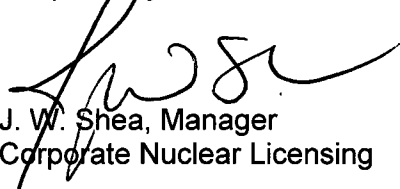
As also discussed at the December 8, 2011, meeting, TVA's development of a high quality NFPA 805 application will require more time than originally anticipated. The peer review of the BFN Fire Probabilistic Risk Assessment, a crucial step in the development of the NFPA 805 application, is planned to start on January 23, 2012. Consequently, TVA is revising its previous submittal schedule commitment. TVA will submit its application no later than March 29, 2013. TVA committed in the letter dated October 29, 2010 (Reference 2) to complete the root cause corrective actions as scheduled. One of these root cause corrective actions is to submit the application to adopt the NFPA Standard 805 with a due date of March 4, 2012. As such, this revised submittal schedule represents a revision to that commitment and the corrective action due date will be revised to March 29, 2013.

While finalizing the submittal of the NFPA 805 application, TVA will continue its approach of developing and implementing additional fire risk reduction modifications to BFN design and procedures. To keep the NRC apprised of progress on these modifications, TVA will submit a detailed list of additional planned modifications and associated implementation schedules by February 17, 2012.

There is one revised commitment and one new commitment contained in this letter as discussed above and contained in the Enclosure to this letter.

If you have any question on these matters, please contact me at 423-718-9576.

Respectfully,



J. W. Shea, Manager
Corporate Nuclear Licensing

Enclosure: Regulatory Commitments

cc (Enclosure):

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

ENCLOSURE

Regulatory Commitments

1. TVA will submit a license amendment request for Browns Ferry Nuclear Plant, Units 1, 2, and 3, to adopt NFPA Standard 805 by no later than March 29, 2013.
2. TVA will submit a detailed list of additional planned fire protection modifications for Browns Ferry Nuclear Plant, Units 1, 2, and 3, and associated implementation schedules by February 17, 2012.