



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

EA-12-051

March 30, 2012

10 CFR 2.202

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

Bellefonte Nuclear Plant, Units 1 and 2
Construction Permit Nos. CPPR-122 and CPPR-123
NRC Docket Nos. 50-438 and 50-439

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

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Watts Bar Nuclear Plant, Unit 2
Construction Permit No. CPPR-92
NRC Docket No. 50-391

Subject: TENNESSEE VALLEY AUTHORITY (TVA) - ANSWER TO ORDER EA-12-051 WITH REGARD TO RELIABLE SPENT FUEL POOL INSTRUMENTATION FOR TVA'S BELLEFONTE NUCLEAR PLANT, BROWNS FERRY NUCLEAR PLANT, SEQUOYAH NUCLEAR PLANT, AND WATTS BAR NUCLEAR PLANT

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective Order in the captioned matter entitled Order Modifying License with Regard to Reliable Spent Fuel Pool Instrumentation

ADD
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(Effective Immediately) ("Order") to, *inter alia*, TVA. The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC has directed nuclear power plant licensees and construction permit holders to take certain actions. Specifically, the NRC is requiring additional defense-in-depth measures to address uncertainties associated with protection from beyond-design-basis events. With respect to this Order, licensees are specifically directed to provide a reliable means of remotely monitoring "wide-range spent fuel pool levels" to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 to the Order.

For holders of operating licenses, the Order requires submission of an overall integrated plan, including a description of how compliance with the requirements described in Attachment 2 will be achieved, to the NRC for review by February 28, 2013. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan on February 28, 2013. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this Order in August 2012. Finally, the Order requires full implementation of its requirements no later than two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever comes first.

For holders of active or deferred construction permits under 10 CFR Part 50, the Order requires submission of an overall integrated plan including a description of how compliance with the requirements described in Attachment 2 will be achieved, to the NRC for review within one (1) year after issuance of the final interim staff guidance. In addition, the Order requires submission of an initial status report 60 days following issuance of the final interim staff guidance and at six month intervals following submittal of an overall integrated plan. The Order states that the NRC intends to issue the interim staff guidance containing specific details on implementation of the requirements of this order in August 2012. Finally, the Order requires full implementation of its requirements in the case of units under construction, prior to issuance of an operating license.

Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, TVA submits this Answer to the Order providing TVA's single, consolidated response to the subject Order for its licensed operating units (Browns Ferry Nuclear Plant, Units 1, 2, and 3; Sequoyah Nuclear Plant, Units 1 and 2; Watts Bar Nuclear Plant, Unit 1) and its units under active or deferred construction permits (Watts Bar Unit 2; Bellefonte Units 1 and 2). TVA hereby consents to the subject Order and does not request a hearing. Based on information currently available, TVA has not identified any circumstances of the

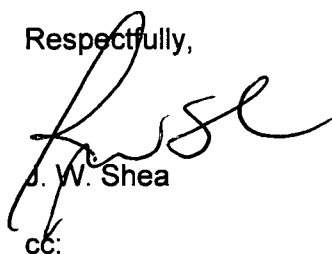
type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, TVA has not identified any impediments to compliance with the Order no later than two refueling cycles after submittal of the overall integrated plan, or by December 31, 2016, whichever comes first for the licensed operating units, or prior to issuance of an operating license for units under active or deferred construction permits (Watts Bar Unit 2; Bellefonte Units 1 and 2).

TVA will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of TVA to comply with the specific compliance deadline dates based on the probable availability of that guidance, TVA's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

If you have questions regarding our comments, please contact Fredrick Mashburn (423)751-8817.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of March 2012.

Respectfully,



J. W. Shea

cc:

NRC Regional Administrator - Region II
NRR Director - NRC Headquarters
NRO Director - NRC Headquarters
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant
NRR Project Manager - Sequoyah Nuclear Plant
NRR Project Manager - Watts Bar Nuclear Plant