



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

EA-12-049

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-12-049 WITH REGARD TO REQUIREMENTS FOR MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS 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

ADD  
NRC

Modifying License with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (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 holders of construction permits in active or deferred status to take certain actions. Specifically with respect to this Order, the NRC requires additional defense-in-depth measures at licensed nuclear power reactors to address uncertainties associated with protection from beyond-design-basis events. Licensees are specifically directed by the Order to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling 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 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, or in the case of units under construction, prior to issuance of an operating license.

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 construction permits in active or deferred status (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 within two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever is earlier 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).

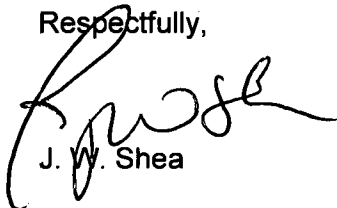
TVA will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, and the impact on the ability of TVA 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

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