



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 28, 2012

LICENSEE: Tennessee Valley Authority

FACILITIES: Browns Ferry Nuclear Plant, Units 1, 2, and 3

SUBJECT: SUMMARY OF THE FEBRUARY 29, 2012, TELECONFERENCE WITH THE TENNESSEE VALLEY AUTHORITY TO DISCUSS THE NFPA-805 TRANSITION FOR BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3 (TAC NO. ME7841, ME7842, AND ME7843)

On February 29, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff conducted a Category 1 public teleconference with the Tennessee Valley Authority (TVA, the licensee) at NRC Headquarters, 11555 Rockville Pike, One White Flint North, Rockville, Maryland. The purpose of the meeting was to discuss the fire risk reduction and transition status to the National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standards for Fire Protection for Light Water Reactor Electric Generating Plants" for Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3.

BACKGROUND

On March 4, 2009, the TVA notified the NRC staff of its intent to transition the BFN, Units 1, 2, and 3 to the NFPA 805 fire protection program in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.48(c). NFPA 805 was adopted in 10 CFR 50.48(c) as an alternative fire protection rule, which is one path to resolving longstanding fire protection issues.

Under this initiative, the NRC has exercised enforcement discretion for most fire protection noncompliances that are identified during the licensee's transition to NFPA 805, and for certain existing identified noncompliances that reasonably may be resolved at the completion of transition. To receive enforcement discretion for these noncompliances, the licensee must meet the specific criteria as stated in Section 9.1, "Enforcement Discretion for Certain Fire Protection Issues (10 CFR 50.48)," of the NRC Enforcement Policy, dated July 12, 2011.

In a public meeting held on December 8, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML11353A319), between the NRC and the TVA, the licensee described a transition strategy intended to address the corrective actions for previously cited fire protection violations, along with other noncompliances identified during the transition period. This strategy encompasses a parallel effort that will add recovery actions based on the potential fire damage to the affected areas. This will necessitate (1) significant changes in safe shutdown procedures and modifications to systems and components, and (2) the development of a license amendment request (LAR) necessary for transition to NFPA 805.

In a letter dated January 13, 2012 (ADAMS Accession No. ML12017A186), TVA reiterated the current transition strategy and notified the NRC that TVA will be revising the BFN Units 1, 2, and 3 submittal schedule date and will submit an LAR no later than March 29, 2013. The newly proposed submittal date is beyond the 3-year allotted timeframe and enforcement discretion granted to BFN Units 1, 2, and 3 for certain noncompliances, which ended on March 4, 2012. However, if provided adequate justification, the NRC may choose to accept the proposed submittal date through the use of a confirmatory order (CO), thereby continuing the enforcement discretion provided in Section 9.1.

DISCUSSION

During the the February 29, 2012, teleconference, the licensee and the NRC staff discussed the status of the BFN Units 1, 2, and 3 fire probabilistic risk assessment (PRA) peer review in support of the NRC decision-making process. The discussion focused on plant modifications, the licensee's fire risk general reduction strategy, and the licensee's schedule to meet the requirements of 10 CFR 50.48 and NFPA 805.

The plant's modifications discussions between the NRC staff and the licensee included the installation of cable tray covers, the local control stations, and the incipient detection system. The licensee indicated that the purpose of installing the cable tray covers in BFN Units 1, 2, and 3 is to delay fire damage in case of a fire. The licensee also indicated that the local control stations will be used to create separation between the electrical circuits. The licensee also described the installation process of the incipient detection system in the compartments and panels of the auxiliary instrumentation room.

The licensee and the NRC staff also discussed plant modifications to BFN Units 1, 2, and 3 related to the cable qualifications, isolation relays, cable routing, cable walkdowns, operator manual actions, and the completed modifications to the site.

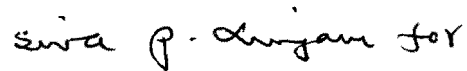
During the meeting, the licensee discussed the status of the fire PRA analysis and the strategy to improve the plant fire safety in BFN Units 1, 2, and 3. The licensee indicated that the fire PRA analysis is undergoing peer review. The licensee explained that the current fire protection model is being refined according to the NRC regulations and the guidance in NUREG-0800 "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR [Light-Water Reactor] Edition." The licensee indicated that the results of the fire PRA would reduce the core damage frequency from $10E^{-4}$ to $10E^{-5}$ for BFN Units 1, 2, and 3. The licensee also indicated that the plant modifications and the refined operator actions will be included in the fire PRA transition.

In terms of scheduling, during the teleconference, the TVA expressed a desire to continue the enforcement discretion due to the delays in the revision of the BFN Units 1, 2, and 3 fire PRA review. Also, TVA indicated willingness to sign a CO, and commit to the proposed March 29, 2013, LAR submittal date. No commitments or regulatory decisions were made by the NRC staff during the meeting.

Members of the public were in attendance, but no public meeting feedback forms were received.

Please direct any inquiries to me at 301-415-2315.

Sincerely,

A handwritten signature in black ink that reads "Eva A. Brown" followed by a stylized flourish.

Eva A. Brown, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-259, 50-260, 50-296

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

LIST OF ATTENDEES

FEBRUARY 29, 2012, MEETING WITH TENNESSEE VALEEEY AUTHORITY

BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3

NFPA-805 TRANSITION

NRC

Joe Giitter
Allen Howe
Douglas Broaddus
Alex Klein
Gerry Weisman
Roger Hannah
Terry Ross
John S. Hyslop
David Stroup
Robert Daley
Gabriel Taylor
William Jones
Daniel Frumkin
Harold Barrett
Charles Stancil
Mark Salley
Eva Brown
Araceli T. Billoch

Tennessee Valley Authority

Joe Shea
Ching Guey
James Emen
James Nesbitt
Rudy Bramhord
Jeff Hamman
Kenny McKenzy
Craig Konty
Roger Hannch

Platts (Nucleonics Week)

Bill Freelavin

Excel

Amy Hayelhoff

GAO

Stephen Carter
Stephanie Goins
Ennie Hoyera

ENCLOSURE

Members of the public were in attendance, but no public meeting feedback forms were received.

Please direct any inquiries to me at 301-415-2315.

Sincerely,

/RA by Siva Lingam for/

Eva A. Brown, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-259, 50-260, 50-296

Enclosure:
List of Attendees

cc w/encl: Distribution via Listserv

Distribution:

PUBLIC	Lpl2-2 R/F	RidsNrrDorlLpl2-2	RidsNrrPMBrownsFerry
RidsNrrLABClayton	RidsAcrsAcnw_MailCTR	RidsNrrDraAfpb	RidsNrrDraApla
RidsNrrDra	RidsOgcRp	RidsRgn2MailCenter	TWertz, NRR
MKotzalas, EDO	SDinsmore, NRR	EGuthrie, RII	RidsNrrDorl
TRoss, RII	DHarrison, NRR	ABilloch, NRR	GWeisman, NRR
RHannah, RII	JHyslop, NRR	DStroup, RES	RDaley, RIII
MSalley, RES	GTaylor, RES	WJones, RII	DFrumkin, NRR
HBarrett, NRR	CStancil, RII		

ADAMS Accession Nos.: Package ML12171A360 Notice ML12055A063 Summary ML12171A363

OFFICE	LPL2-2/PM	LPL2-2/PM	LPL2-2/LA	LPL2-2/BC	LPL2-2/PM
NAME	EBrown	ABillochColón	BClayton	DBroadus	EBrown (SLingam for)
DATE	06/19/12	06/19/12	06/28/12	06/28/12	06/28/12

OFFICIAL RECORD COPY