



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

February 14, 2013

10 CFR 50.4  
10 CFR 50.54(f)

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

Watts Bar Nuclear Plant, Units 1 and 2  
NRC Docket Nos. 50-390 and 50-391

Subject: **WATTS BAR NUCLEAR PLANT (WBN) UNIT 2 – UPDATED RESPONSE  
TO NRC BULLETIN 2011-01, “MITIGATION STRATEGIES”**

- References:
1. TVA letter to NRC dated June 29, 2007, “TVA Nuclear (TVAN) Supplemental Response – Mitigation Strategy Assessments and Closure Process for Phases 1, 2, and 3”
  2. TVA letter to NRC dated July 1, 2010, “Watts Bar Nuclear Plant (WBN) Unit 2 – Mitigation Strategy Assessments and Closure Processes for Phases 1, 2, and 3”
  3. TVA letter to NRC dated October 14, 2010, “Watts Bar Nuclear Plant (WBN) Unit 2 – Mitigation Strategy Assessments and Closure Processes for Phases 1, 2, and 3”
  4. TVA letter to NRC dated July 11, 2011, “60-Day Response to NRC Bulletin 2011-01, Mitigating Strategies”
  5. TVA letter to NRC dated July 18, 2011, “Watts Bar Nuclear Plant (WBN) Unit 2 – Response to NRC Bulletin 2011-01, Mitigation Strategies”
  6. TVA letter to NRC dated April 26, 2012, “Watts Bar Nuclear Plant (WBN) Unit 2 – Transmittal of Revised Unit 1/Unit 2 As-Designed Fire Protection Report (TAC No. Me3091)”

NRC issued EA-02-026, “Order for Interim Safeguards and Security Compensatory Measures” (the ICM Order) on February 25, 2002. Section B.5.b of the ICM Order required

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licensees to adopt mitigation strategies using readily available resources to maintain or restore core cooling, containment and Spent Fuel Pool (SFP) cooling capabilities to cope with the loss of large areas of the facility due to large fires and explosions from any cause, including beyond-design-basis aircraft impacts. The actions and equipment required for each mitigating strategy was documented in a series of tables in accordance with NEI 06-12, "B.5.b Phase 2 & 3 Submittal Guideline." Reference 1 submitted the strategy tables for WBN Unit 1.

Subsequent to this, NRC amended 10 CFR 50 to add 10 CFR 50.54(hh)(2) to impose mitigating strategy requirements similar to those imposed by the ICM Order. Reference 2 submitted a series of commitments for WBN Unit 2 related to Section B.5.b [10 CFR 50.54(hh)(2)]. This letter was updated and superseded by Reference 3.

NRC released Bulletin 2011-01, "Mitigating Strategies," on May 11, 2011, which required that action be taken to verify compliance with 10 CFR 50.54(hh)(2). Reference 4 provided TVA's response to the bulletin for its operating units. The response for WBN Unit 1 was provided in Enclosure 3 of Reference 4. WBN Unit 2 responded to Bulletin 2011-01 (Reference 5) and made the following commitment:


"TVA will respond as appropriate to the information requested in this Bulletin consistent with the approach provided by Watts Bar, Unit 1 prior to licensing Unit 2."

Consistent with the above commitment, TVA intends to submit by October 15, 2014, an updated set of mitigation strategy tables which will be applicable to WBN Unit 1 and Unit 2. This submittal will also include information which updates WBN's response for Bulletin 2011-01 for Unit 1 and Unit 2. Submitting this information by October 15, 2014, aligns TVA's update for Bulletin 2011-01 and the mitigation strategy tables with TVA's commitment to submit the as-constructed version of the dual unit Fire Protection Report (FPR). TVA's commitment for the submittal of the FPR by October 15, 2014, was made in Reference 6.

The new regulatory commitment made in this submittal is listed in the enclosure. If you have any questions, please contact Gordon Arent at (423) 365-2004.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of February 2013.

Respectfully,

  
J. W. Shea  
Vice President, Nuclear Licensing

cc: See Page 3

Enclosure:  
Commitment List

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cc:

U. S. Nuclear Regulatory Commission  
Region II  
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245 Peachtree Center Ave., NE Suite 1200  
Atlanta, Georgia 30303-1257

NRC Resident Inspector Unit 2  
Watts Bar Nuclear Plant  
1260 Nuclear Plant Road  
Spring City, Tennessee 37381

## **Enclosure**

### **Commitment List**

1. TVA intends to submit by October 15, 2014, an updated set of mitigation strategy tables which will be applicable to WBN Unit 1 and Unit 2. This submittal will also include information which updates WBN's response for Bulletin 2011-01 for both Unit 1 and Unit 2.