



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

CNL-17-009

March 30, 2017

10 CFR 50.4

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

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Subject: **REVISION TO COMMITMENT TO DEVELOP TECHNICAL
SPECIFICATION REQUIREMENTS FOR THE EMERGENCY HIGH
PRESSURE MAKEUP PUMP SYSTEM IN TECHNICAL SPECIFICATIONS**

- References:
1. Letter from TVA to NRC, "License Amendment Request to Adopt NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants (2001 Edition), (Technical Specification Change TS-480)," dated March 27, 2013 (ML13092A393)
 2. Letter from TVA to NRC, CNL-16-107, "Revision to NFPA 805 Interim Compensatory Measures Commitments Regarding Fire Watches and Voluntary Commitment to Notify NRC of Commitment Revisions," dated July 7, 2016 (ML16006A124)

By letter dated March 27, 2013 (Reference 1), Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for Browns Ferry Nuclear Plant (BFN), Units 1, 2, and 3, to transition to National Fire Protection Association Standard (NFPA) 805. In an attachment to the Reference 1 letter, TVA identified a list of 18 new regulatory commitments to address fire risk in certain fire areas.

By letter dated July 7, 2016 (Reference 2), TVA provided a revised List of Regulatory Commitments that superseded the previous List of Regulatory Commitments in total. Commitment 1 in both of the referenced letters stated:

"TVA will submit a License Amendment Request proposing Technical Specifications requirements for the new emergency high pressure makeup pump system on a schedule to support the modification implementation date provided in Section 5.5 of the enclosure to this letter."

After further reviewing the requirements to Title 10 of the *Code of Federal Regulation* (CFR) 50.36 and the Statements of Consideration (SOC) for the 10 CFR 50.36 Rule Change, TVA has concluded that the appropriate location for the requirements on the new emergency high pressure makeup pump (EHPMP) are in licensee controlled documents that will be governed by the NFPA 805 monitoring program. The TVA licensee controlled documents will provide adequate protection to the public health and safety without the need for a separate Technical Specification as discussed below. Therefore, this letter informs the NRC that TVA is revising Commitment 1 as follows:

"TVA will establish availability, performance requirements and testing frequencies for the new emergency high pressure makeup pump system in licensee controlled documents, which will be governed by the NFPA 805 monitoring program discussed in Section 4.6 of the NFPA 805 LAR. The development of these requirements will be scheduled to support the modification implementation date provided in Section 5.5 of the NFPA 805 LAR."

The rationale for this commitment revision is outlined below:

- The original commitment to develop a new Technical Specification for the EHPMP system was based on the system meeting 10 CFR 50.36(c)(2)(ii)(D), Criterion 4 ["Criterion 4"], that requires a Technical Specification for "A structure, system, or component which... probabilistic risk assessment has shown to be a significant risk to the health and safety of the public." As discussed in the SOC for the 10 CFR 50.36 Rule Change, "It is the intent of this criterion [Criterion 4] that those requirements that PSA [Probabilistic Safety Assessment] or operating experience exposes as significant to public health and safety, consistent with the Commission's Safety Goal and Severe Accident Policies, be retained or included in Technical Specifications." Upon further review of the SOC for Criterion 4, TVA noted that the Staff provided latitude to licensees to evaluate new systems, structures, and components (SSC) for inclusion into the Technical Specifications and stated that removal of items from the Technical Specifications does not decrease licensee attention to safety. The SOC also stated that using Criterion 4 to place constraints in the Technical Specifications "...need to be such that it justified including the constraints in the technical specifications to ensure adequate protection of the public health and safety or that the addition of such constraints provides substantial additional protection to the public health and safety." TVA has concluded that the controls established by the NFPA 805 monitoring program provide adequate protection to the public health and safety without the need for a separate Technical Specification for the EHPMP system.
- Addressing the EHPMP system availability, performance, and testing requirements in licensee controlled documents is consistent with the monitoring requirements of NFPA 805, Section 2.6, "Monitoring," and the supplemental guidance provided by NEI 04-02, "Guidance for Implementing a Risk-Informed, Performance Based Fire Protection Program Under 10 CFR 50.48(c)", Section 4.5.3 "Monitoring", and FAQ 10-0059, "NFPA 805 Monitoring," as described in the NFPA 805 LAR,

Transition Report, Section 4.6, "Monitoring Program." Maintaining the monitoring requirements for the EHPMP system in licensee controlled documents is consistent with the approach and methods for managing the availability, performance, and testing requirements of other High Safety Significance (HSS) fire protection systems and features in the BFN Fire Protection Program under NFPA 805. Monitoring EHPMP system availability and performance using BFN's Fire Protection Program ensures station attentiveness to system health while maintaining flexibility for program adjustments as operating experience for this new system is acquired.

Although not required by TVA's NFPA 805 LAR or the NRC Safety Evaluation approving TVA's NFPA 805 application, TVA is providing this notification of commitment change to establish the EHPMP system monitoring requirements in licensee controlled documents.

Please address any questions regarding this submittal to Mr. Edward D. Schrull at (423) 751-3850.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

cc:

NRC Regional Administrator – Region II
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