



Browns Ferry Nuclear Plant Emergency Response Organization Staffing and Augmentation

License Amendment Request Pre-Submittal Call Meeting
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Participants

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Agenda

- Purpose
- Emergency Plan Licensing Basis
- Proposed Changes
- Precedent
- Regulatory Requirements and Guidance
- Schedule
- Conclusion
- Questions

Purpose

To outline proposed Browns Ferry Nuclear Plant (BFN) Emergency Plan changes and the considerations used in development of the License Amendment Request, including:

- Regulatory Requirements
- Regulatory Guidance
- Current NRC Staff positions
- Sequoyah Nuclear Plant Draft Requests for Additional Information (RAIs)

Licensing Basis

- BFN Emergency Plan, Revision 0, was approved by the NRC by Safety Evaluation Report dated November 1, 1988
- TVA's Radiological Emergency Plan (REP) has two components for each site
 - NP-REP (Generic) which contains fleet-wide information [Current Revision 107]
 - BFN Site Specific REP Appendix A [Current Revision 108]

Proposed Changes

- Eliminate 30-minute augmented response positions
- Extend the requirement for dispatch of sampling teams from 30 and 60 minutes to 60 and 90 minutes
- Extend augmentation response times for onsite ERO personnel to 90 minutes
- Reduce the number of Radiation Protection (RP) immediate response positions from 12 to 6
- Transition on-shift dose assessment function from RP to Chemistry
- Remove maintenance personnel from on-shift
- Eliminate the 60-minute augmented response by the Radwaste Operator (RWO)
- Remove other 'as needed' support positions from REP Appendix A Emergency Plan Figures

Precedent

Safety Evaluations issued for the following:

- Susquehanna (ML030830543)
- Fermi (ML112450464)
- River Bend (ML012710218)
- Watts Bar (ML041810056)
- Point Beach (ML16118A154)
- Duane Arnold (ML17220A026)

Requests for Additional Information (RAIs) associated with the Sequoyah Nuclear Plant submittal dated September 29, 2017. (ML17272A940)

Applicable Regulatory Requirements

- 10 CFR 50.47(b)
- 10 CFR 50.54(q)
- 10 CFR 50, Appendix E
- 10 CFR 50.90

Applicable Guidance Documents

- RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,” Revision 1
- NSIR/DPR-ISG-01, “Emergency Planning for Nuclear Power Plants”
- NEI 10-05, “Assessment of On-Shift Emergency Response Organization Staffing and Capabilities”
- NUREG-0654/FEMA-REP-1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” Revision 1
- RIS 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”

Schedule

- Submit in March 2018
- Request approval within one year of submittal acceptance
- Propose a 180 day implementation period

Conclusion

Based on the technical, functional, and staffing analyses performed, TVA has concluded that the proposed changes:

- Maintain support for the required Emergency Plan functions
- Continue to ensure the protection of public health and safety
- Comply with applicable regulatory requirements

Questions?



