



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

CNL-18-019

February 20, 2018

10 CFR 52.17

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

Clinch River Nuclear Site
NRC Docket No. 52-047

Subject: Replacement Pages for Response to Request for Additional Information Related to Emergency Planning Exemption Requests in Support of Early Site Permit Application for Clinch River Nuclear Site

- References:
1. Letter from TVA to NRC, CNL-16-081, "Application for Early Site Permit for Clinch River Nuclear Site," dated May 12, 2016
 2. USNRC Request for Additional Information No. 11, Review Section: 13.03 - Emergency Planning, Application Section: Part 6, EP Exemption, dated December 21, 2017 (eRAI-9227)
 3. Letter from TVA to NRC, CNL-18-009, "Response to Request for Additional Information Related to Emergency Planning Exemption Requests in Support of Early Site Permit Application for Clinch River Nuclear Site," dated January 22, 2018

By letter dated May 12, 2016 (Reference 1), Tennessee Valley Authority (TVA) submitted an early site permit application (ESPA) for the Clinch River Nuclear (CRN) Site in Oak Ridge, TN. Based on the staff's review of ESPA Part 6, *Exemptions and Departures*, an electronic request for additional information (eRAI) 9227 was issued (Reference 2). By letter dated January 22, 2018 (Reference 3), TVA provided a response to eRAI 9227. The eRAI response provided in the Reference 3 letter omitted a portion of the markups previously provided in Reference 1. The staff informed TVA of the omitted portion of the markups provided in Reference 3. The omission affects ESPA Part 6, Table 1-2, Item 18 markups provided in Enclosures 2 and 3 of Reference 3, other enclosures and markups provided in Reference 3 are not affected. A TVA condition report has been created to document this omission.

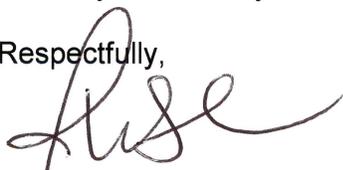
U.S. Nuclear Regulatory Commission
CNL-18-019
Page 2
February 20, 2018

The purpose of this letter is to provide replacement pages for Reference 3, Enclosures 2 and 3, that will form a complete copy of the exemption request markups. The enclosure to this letter provides the replacement pages for Enclosure 2, page E2-7, and Enclosure 3, page E3-7 of Reference 3.

There are no new regulatory commitments associated with this submittal. If any additional information is needed, please contact Dan Stout at (423) 751-7642.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 20th day of February 2018.

Respectfully,



J. W. Shea
Vice President, Nuclear Regulatory Affairs and Support Services

Enclosure:

Replacement Pages for Enclosures 2 and 3 of CNL-18-009

cc (w/ Enclosure):

M. Sutton, Project Manager, Division of New Reactor Licensing, USNRC

cc (w/o Enclosure):

C. Haney, Regional Administrator, Region II, USNRC
F. Akstulewicz, Director, Division of New Reactor Licensing, USNRC
J. Colaccino, Branch Chief, Division of New Reactor Licensing, USNRC
A. Fetter, Project Manager, Division of New Reactor Licensing, USNRC
P. Vokoun, Project Manager, Division of New Reactor Licensing, USNRC
T. Dozier, Project Manager, Division of New Reactor Licensing, USNRC
M. M. McIntosh, Regulatory Specialist, Eastern Regulatory Field Office, Nashville District,
USACE

Enclosure

Replacement Pages for Enclosures 2 and 3 of CNL-18-009

Note: Bold text with strikethroughs indicates text to be deleted. Text not in bold with strikethroughs represent exemptions being sought and are part of a previous submittal. Underlines indicate text to be added.

**Table 1-2 (Sheet 9 of 10)
Exemptions Requested from 10 CFR 50, Appendix E for the Site Boundary EPZ Emergency Plan**

Item	Regulation in Appendix E to 10 CFR Part 50	Basis for Exemption
18	<p>F.2.d. <u>Each State with responsibility for nuclear power reactor emergency preparedness should fully participate in the ingestion pathway portion of exercises at least once every exercise cycle. In States with more than one nuclear power reactor plume exposure pathway EPZ, the State should rotate this participation from site to site.</u></p> <p>Each State with responsibility for nuclear power reactor emergency preparedness should fully participate in the ingestion pathway portion of exercises at least once every exercise cycle. In States with more than one nuclear power reactor plume exposure pathway EPZ, the State should rotate this participation from site to site.</p> <p>Each State with responsibility for nuclear power reactor emergency preparedness should fully participate in a hostile action exercise at least once every cycle and should fully participate in one hostile action exercise by December 31, 2015. States with more than one nuclear power reactor plume exposure pathway EPZ should rotate this participation from site to site.</p>	<p><u>Because there are no offsite consequences from any credible event in excess of the criteria provided in SSAR Section 13.3, formal offsite radiological emergency response plans are not necessary. Therefore, there is no need for OROs to participate in hostile action exercises.</u></p> <p><u>Although the likelihood of an accident or event resulting in offsite doses exceeding the EPA PAG beyond the Site Boundary is extremely remote, TVA's Emergency Plan will describe the capabilities to determine if a radiological release is occurring and promptly communicate that information to OROs for their consideration. OROs are responsible for deciding what, if any, protective actions should be taken utilizing its CEMP. Formal offsite radiological emergency response plans would not be required. Therefore, offsite participation in a hostile action exercise is not required.</u></p> <p><u>TVA would continue to invite State and local support organizations to participate in the periodic drills and exercises conducted to assess its ability to perform responsibilities related to an emergency at the facility.</u></p> <p>Refer to basis for 10 CFR 50, Appendix E, Section IV.2.</p>

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