



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

June 18, 2018

10 CFR 50.4
10 CFR 50.54(q)
10 CFR 50, Appendix E
10 CFR 72.44(f)

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, 50-296, and 72-052

**SUBJECT: Browns Ferry Nuclear Plant - Site Emergency Plan Implementing Procedure
Revision**

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q); 10 CFR 50, Appendix E; and 10 CFR 72.44(f), the Tennessee Valley Authority (TVA) is submitting a description of changes to the Browns Ferry Nuclear Plant (BFN) Radiological Emergency Plan (REP). The affected document is the BFN Emergency Plan Implementing Procedure (EPIP) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-6	0039	Activation and Operation of the Technical Support Center (TSC)	05/29/2018

Description of Changes and Summary of Analysis

EPIP-6, Revision 39, was revised to incorporate a collection of both editorial and non-editorial changes. These changes are described below.

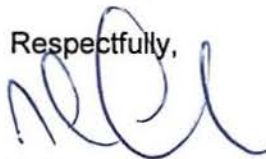
One revision proposed adding a statement to the "Operations Responsibilities" section of Appendix J, *NRC Coordinator Checklist*. This step was to ensure that in the event that the Emergency Response Data System (ERDS) was not transmitting to the NRC, a copy of Appendix V (Plant Parameters Data Sheets) is to be obtained from the Technical Assessment Team (TAT) Leader and reported to the NRC. This change was determined to not be editorial in nature and did not conform to an activity with prior approval; therefore, this activity could not be implemented without performing a 50.54(q) reduction in effectiveness evaluation. This evaluation concluded that the change was not a reduction in effectiveness of the plan because there were no changes to the ERDS software's core functionality, the data points provided by the system, or the maintenance and testing of the system as a result of the change. It was determined that the change constitutes an increase in the effectiveness of the plan because it provides a backup to the ERDS in the case of a failure of the system to transmit data to the NRC. In conclusion, the activity continued to comply with the requirements of 50.47(b) and 50 Appendix E. The activity did not constitute a reduction in effectiveness; therefore, the activity was implemented without prior approval.

Changes were made related to Severe Accident Mitigating Guideline (SAMG) entries, in Appendices B, C, E, N, and R, to align the procedure with NPG-SPP-18.3.1, *Severe Accident Management Guideline Program Administration*. These changes were screened collectively because the justification for making the changes is the same. The changes did not impact the normal capabilities or functions of the Emergency Response Organization (ERO) in response to a design basis event. SAMGs are guidelines that are used to mitigate the effects of an event that has escalated to a condition that is beyond design basis; therefore, the changes are not bound by the planning standards found in 10 CFR 50.47. The change was determined to be non-editorial in nature. The activity did not involve a site specific Emergency Preparedness commitment; therefore, the activity was implemented without performing a 50.54(q) reduction in effectiveness evaluation.

The last revision was to change the phone number for the Facilities Maintenance Hotline in step 9.0 of Appendix I. This was a phone number change only. There was no change to the outcome, results, functions, processes, responsibilities, or requirements of the performance of the procedure or instructions. The change was determined to be editorial in nature; therefore, the activity was implemented without performing a 50.54(q) reduction in effectiveness evaluation.

There are no new regulatory commitments in this letter. If you have any questions regarding this submittal, please contact B. F. Tidwell at (256)729-3666.

Respectfully,



D. L. Hughes
Vice President

U.S. Nuclear Regulatory Commission
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cc:

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant
NRC Director - Division of Spent Fuel Management, NMSS