



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

August 29, 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. The affected documents are the BFN Emergency Plan Implementing Procedures (EIPs) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-6	0040	Activation and Operation of the Technical Support Center (TSC)	07/30/2018
EPIP-7	0035	Activation and Operation of the Operations Support Center (OSC)	07/30/2018

#### Description of Changes and Summary of Analysis

EPIP-6, Revision 40, was revised to incorporate several changes related to the relocation of the Technical Support Center (TSC). The below changes were determined to be not editorial/typographical in nature. The revision involved removing the possible relocation options from section 3.5 in the main body of the procedure. This information is not needed because the step refers the user to Appendix Y for implementing the need to relocate. Step 1.0 of Appendix Y was also rewritten to provide a list of things to consider for each possible location when deciding on a location to relocate to. Step 5.0 of Appendix Y was also written to include a more detailed list

of items to bring to the alternate locations. Next, EPIP-6, Revision 40 was revised to incorporate changes related to the Long-Term Operation of the TSC. References to NPG-SPP-18.3.6 (Extended Staffing Under Abnormal Conditions) were added to sections 2.2 (step 2.2.B) and 3.7 (step 3.7.A). This change moved step 3.7.A of Revision 39 to step 3.7.B in Revision 40 and step 3.7.B of Revision 39 to step 3.7.C. Steps 3.7.C and 3.7.D from Revision 39 were combined into one step (step 3.7.D) in Revision 40 to add a reference to the Site Accommodations Coordinator to define responsibilities for making meal and sleeping arrangements. An item was added to the Operational Responsibilities section of Appendix B to coordinate with the Site Vice President to ensure a Site Accommodations Coordinator is assigned in accordance with NPG-SPP-18.3.6 (Extended Staffing Under Abnormal Conditions). Several changes were made to Appendix V to update the instruments listed in the tables based on changes that have been made in the Main Control Rooms. Step 6.0 of Appendix D (Radiation Protection Manager Checklist) was rewritten to add instruction associated with ensuring the habitability sign in the TSC is accurate and to improve the implementation of the PA announcement.

Several editorial/typographical changes were also incorporated throughout EPIP-6, Revision 40. Unnecessary spaces around dashes (-) and slashes (/) were removed throughout the document. In step 3.4.B “Site Emergency Director” and “Shift Manager” were abbreviated to “SED” and “SM,” respectively. A colon was added after “order” in step 3.4.D. Step 3.6.A was reformatted to better align with the rest of the document. Unnecessary spaces were removed from the first bullet of the Operational Responsibilities section in Appendix B and step 5.0 in Appendix C. The quotation marks in the first bullet of Operational Responsibilities in Appendix B were modified to ensure that they were in the correct position. A period was added to the end of the first bullet of Operational Responsibilities of Appendix D and the second bullet of Operational Responsibilities of Appendix R. The word “implant” was replaced with “in plant” in the first bullet of Operational Responsibilities of Appendix D. In order to add clarity, the word “than” was added to step 6.0 of Appendix J. The formatting of MSIV Status Reading in Appendix V was modified to include all of the data on one line. “CHPR” was replaced with “CHBR” in the “Parameter” column of the table at the bottom of page 3 of 4 in Appendix V. Lastly, the fourth bullet in the Operational Responsibilities section of Appendix D and Appendix G were rewritten to correct the reference to EPIP-1 (Emergency Classification Procedure) related to an EOI-4 (Radioactivity Release Control) entry condition.

EPIP-7, Revision 35 was revised to incorporate several changes related to the relocation of the Operations Support Center (OSC). The below changes were determined to be not editorial/typographical in nature. In step 3.5.A, the Plant Manager’s Office Area is designated as the primary relocation option for the OSC. Relocation options to consider were added to step 3.5.A. Step 3.5.B was added to the main body of the procedure to provide a list of items to consider bringing to the alternate location. Step 3.5.C was added to the main body of the procedure to ensure that the TSC has new contact information for OSC personnel. A reference to NPG-SPP-18.3.6, Extended Staffing Under Abnormal Conditions, was added to section 3.7.

Several editorial/typographical changes were made to EPIP-7, Revision 35. Unnecessary spaces around slashes (/) were removed throughout the document. The title of 10 CFR 50.47 (Emergency Plans) was corrected in section 2.1. The abbreviation “(SM)” was added to the first instance of

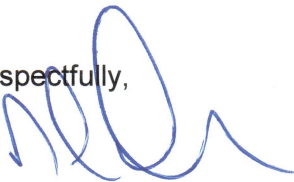


“Shift Manager” and all other occurrences were replaced with “SM” in section 3.1. A comma was added after “Emergency Preparedness” in section 3.3. In step 3.4.F, “Site Emergency Director” was replaced with “SED.” Quotation marks were added around “SED Procedure Deviation Checklist” in step 3.8.B. The first comma in both PA announcements in step 9.0 of Appendix B was replaced with a period. In step 4.0 of Appendix C, the word “is” was added after “Supervisor.” A comma was added to bullet four of Operational Responsibilities of Appendix C. The seventh bullet of the Operational Responsibilities section in Appendix C was removed since the action was redundant that is included in the checklist for this position to be completed upon the initial activation of the OSC. In step 5.0 of Appendix G, “Personnel” was replaced with “personnel.” “Check and” was removed from the beginning of step 5.0 in Appendix I and step 5.0 in Appendix J. Checking is inherent in the actions associated with the action verb “ensure;” therefore, “check” is not needed to meet the intent of these steps. The word “ensure” was capitalized in step 6.0 of Appendix I and step 5.0 of Appendix J. All instances of “Fire Protection Manager” in Appendix K were replaced with “Fire Operations Briefer.” In the second bullet of the Operational Responsibilities section of Appendix W, the word “Planning” was replaced with “planning.” Lastly, the word “Available” was replaced with “Required” in the sixth column of the table in Appendix Y. This change was a correction of a typographical error that occurred in a previous revision.

These activities were all evaluated under EPDP-17, Attachment 2 (Screening Evaluation Form) to determine whether a 50.54(q) Reduction in Effectiveness Evaluation was required. All changes were determined to be changes to the radiological emergency plan; however, only those determined to not be editorial/typographical required performance of a 50.54(q) reduction in effectiveness evaluation. The activities were determined to comply with the requirements of 50.47(b) and 10 CFR 50 Appendix E. The proposed activities did not constitute a reduction in effectiveness; therefore, it was determined that the activities could be implemented without prior approval.

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

cc:

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