



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

December 19, 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 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-1 | 0058 | Emergency Classification Procedure | 11/19/2018 |

Description of Changes and Summary of Analysis

EPIP-1, Revision 58, was revised to incorporate changes to update the values in the Fission Product Barrier (FPB) Matrix thresholds 4.A on all three barriers to reflect BFN Unit 1 Extended Power Uprate (EPU) values. These changes are based on BFN Calculation NDQ0090930050, Revision 11. The wall boards were also be updated to reflect the changes to the FPB matrix and to increase the revision level.

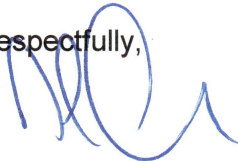
This activity was evaluated using EPDP-17, Attachment 2 to determine whether a 10 CFR 50.54(q) Reduction in Effectiveness Evaluation was required. The activities were determined to be a change to the radiological emergency plan that was not editorial or typographical. Upon completion of Attachment 2 of EPDP-17, it was determined that the activity could not be implemented without performing a 10 CFR 50.54(q) Reduction in Effectiveness Evaluation;

therefore, EPDP-17, Attachment 4 (Effectiveness Evaluation Form) was completed. It was determined that the activity continues to comply with the requirements of 50.47(b) and 50 Appendix E, and the activity does not constitute a reduction in effectiveness. Therefore, the activity can be implemented without prior approval.

An EAL Change Review Form was also completed as this change was considered a difference from the approved wording. The update to the thresholds was determined to be necessary to reflect the values contained in Calculation NDQ0090930050 that corresponds to the uprated condition at BFN Unit 1. The change in total megawatt thermal power is reflected in the calculation and impacts the thresholds for primary containment radiation monitors within the FPB matrix. As such, the change was necessary to reflect the calculation outputs for BFN U1 EPU.

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
Site Vice President

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