



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

CNL-19-055

June 12, 2019

10 CFR 50.54(q)  
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

Sequoyah Nuclear Plant, Units 1 and 2  
Renewed Facility Operating License Nos. DPR-77 and DPR-79  
NRC Docket Nos. 50-327, 50-328, and 72-034

Watts Bar Nuclear Plant, Units 1 and 2  
Facility Operating License Nos. NPF-90 and NPF-96  
NRC Docket Nos. 50-390, 50-391, and 72-1048

Subject: **TENNESSEE VALLEY AUTHORITY - CENTRAL EMERGENCY CONTROL CENTER EMERGENCY PLAN IMPLEMENTING PROCEDURE REVISIONS**

In accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(q) and 10 CFR 72.44(f), Tennessee Valley Authority (TVA) is submitting a description of changes to the TVA Radiological Emergency Plan (REP). The affected documents are the Central Emergency Control Center (CECC) Emergency Plan Implementing Procedures (EPIPs) and the Emergency Preparedness Department Procedure (EPDP) named below.

<u>Document</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPDP-3	16	Emergency Plan Exercises and Preparedness Drills	5/14/2019
CECC EPIP-6	43	CECC Plant Assessment Staff Procedure for Alert, Site Area Emergency, and General Emergency	5/17/2019
CECC EPIP-8	48	Dose Assessment Staff Activities During Nuclear Plant Radiological Emergencies	5/17/2019

## **Description of Changes and Summary of Analysis**

### **EPDP-3**

TVA updated position titles in EPDP-3 to reflect new positions and to clarify the approvals required for drill and exercise packages. In addition, many changes were made to how drills and exercises are being tracked within the 8-year cycle. The tracked drills and exercises were rearranged and the language was clarified regarding the frequency of performance. References to the REP were updated and historical data for 2017 and 2018 performances were added. Other historical data were corrected, and key skill and Emergency Action Level (EAL) usage data were also updated. This revision included the transition from the NUMARC/NESP-007 EAL scheme to the Nuclear Energy Institute (NEI) 99-01, Revision 6, EAL scheme. The section discussing Augmentation Drills was significantly altered to better align with the REP and the frequency of performance for Unannounced Augmentation Drills was changed to better align with the REP. The definition of "Off Year Exercise" was modified and the term itself was changed to "Off Year Activity." The definition of Weakness was added based on information in Nuclear Regulatory Commission (NRC) Inspection Manual Chapter 0609, Appendix B. Requirements to contact every participant who could not attend a pre-job brief were removed from the procedure. The formatting and content of drill controller packages, drill reports, and pre-job briefing packages were altered to align with the software currently being used to develop those documents. Other editorial changes were also made.

### **CECC EPIP-6**

The definition of "holdup time" was revised to better align with the dose assessment software assumptions. Outdated requirements for communications between emergency operations facilities were removed. In addition, information regarding Response Plans for Strategic Alliance for FLEX Emergency Response were updated.

### **CECC EPIP-8**

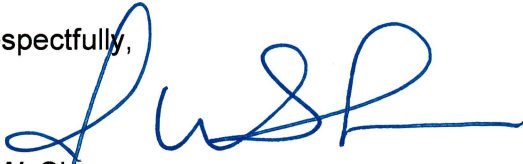
The body of the procedure was clarified to show that the accident types are applicable to both single and multi-accident dose assessment. In addition, information for evaluating tritium-producing burnable absorber rod failures at Watts Bar Nuclear Plant was included. The definition of holdup time was revised to align with CECC EPIP-6 and to better align with the dose assessment software assumptions. Some checklist items were added for minor administrative actions and the requirement to record the Mix ID was removed (it is now optional). In several of the attachments, it was clarified which printouts need to be initialed by the dose assessors. In the attachment for comparing field team data to dose assessment results, additional fields were added to allow dose assessors to document pertinent information about the dose assessment runs they are comparing and clarification was provided regarding where the current peak dose rate can be obtained. Gaseous and liquid effluent values for exceeding the Offsite Dose Calculation Manual were updated based on revisions to the applicable input calculations. The procedure was updated to reflect the continuous assessment block of the Protective Action Recommendation flowchart provided in the REP. Other editorial changes were also made.

U. S. Nuclear Regulatory Commission  
CNL-19-055  
Page 3  
June 12, 2019

These changes were evaluated in accordance with 10 CFR 50.54(q)(3). TVA determined that the changes did not reduce the effectiveness of the TVA REP. The TVA REP, as revised, continues to meet the requirements in Appendix E to 10 CFR 50 and the planning standards of 10 CFR 50.47(b).

There are no new regulatory commitments in this letter. Please address any questions regarding this submittal to Kimberly D. Hulvey at (423) 751-3275.

Respectfully,



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

cc:

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant  
NRC Senior Resident Inspector - Sequoyah Nuclear Plant  
NRC Senior Resident Inspector - Watts Bar Nuclear Plant  
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NRC Project Manager - Sequoyah Nuclear Plant  
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