

**From:** Wentzel, Michael  
**Sent:** Wednesday, December 2, 2020 11:33 AM  
**To:** Orf, Tracy J  
**Subject:** Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Audit Plan and Setup of Online Reference Portal (EPID L-2020-LLA-0162)  
**Attachments:** Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Plan for Audit of Information in Support of LAR to Adopt 10 CFR 50.69 (L-2020-LLA-0162).pdf

Dear Mr. Orf:

By application dated July 17, 2020 (Agencywide Documents Access and Management System Accession No. ML20199M373); the Tennessee Valley Authority (TVA), submitted a license amendment request to allow for the voluntary adoption of the requirements of Title 10 of the *Code of Federal Regulations*, Section 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors," at Browns Ferry Nuclear Plant, Units 1, 2, and 3.

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) staff's review, TVA's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff limited, read-only access to the information identified in Section 4.0 of the attached audit plan. The NRC staff plans to conduct a desk audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit internal licensee information to confirm that the information support statements made in the license amendment request and to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be formally submitted on the docket. The audit may also include interactions (e.g. teleconferences or webinars) on a mutually agreeable schedule sufficient to understand or resolve issues associated with the information made available on the online reference portal.

Use of the online reference portal is acceptable, as long as the following conditions are met:

- The online reference portal will be password-protected and passwords will be assigned to those directly involved in the review on a need-to-know basis;
- The online reference portal will be sufficiently secure to prevent NRC staff from printing, saving, or downloading any documents; and
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

These conditions associated with the online reference portal must be maintained throughout the duration of the audit process.

The NRC staff would like to request that the portal be populated with the information identified in Section 4.0 of the attached audit plan. The NRC staff may request additional documents during the review, which will be transmitted to you via email.

If you have any questions, please contact me at (301) 415 6459 or [michael.wentzel@nrc.gov](mailto:michael.wentzel@nrc.gov).

Sincerely,

Michael J. Wentzel, Project Manager  
Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

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**From:** Wentzel, Michael

**Created By:** Michael.Wentzel@nrc.gov

**Recipients:**  
"Orf, Tracy J" <tjorf@tva.gov>  
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AUDIT PLAN  
REGARDING LICENSE AMENDMENT REQUEST TO  
ADOPT THE REQUIREMENTS OF 10 CFR 50.69  
TENNESSEE VALLEY AUTHORITY  
BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3  
DOCKET NOS. 50-259, 50-260, AND 50-296  
EPID L-2020-LLA-0162

1.0 BACKGROUND

By application dated July 17, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20199M373), the Tennessee Valley Authority (TVA; the licensee) submitted a license amendment request (LAR) for Browns Ferry Nuclear Plant, Units 1, 2, and 3 (Browns Ferry). The proposed amendments would allow for the voluntary adoption of the requirements of Title 10 of the *Code of Federal Regulations*, Section 50.69, "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors."

The U.S. Nuclear Regulatory commission (NRC) staff has reviewed the licensee's submittal and determined that a regulatory audit of the information identified in the Information Request section below would assist in the timely completion of the subject LAR review process. The NRC staff is continuing to review other aspects of the licensee's submittal and may identify the need for additional audit subjects by separate correspondence.

2.0 REGULATORY AUDIT BASES

An audit was determined to be the most efficient approach toward a timely resolution of questions associated with this LAR review, because the NRC staff will have an opportunity to minimize the potential for RAIs and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The NRC staff is requesting an initial set of internal licensee information to be audited by the staff using an online reference portal. Upon completion of this audit, the NRC staff is expected to achieve the following.

1. Confirm internal licensee information that supports statements made in the LAR.
2. Determine whether the information included in the documents is necessary to be submitted to support a safety conclusion.

The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

### 3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

The purpose of the remote audit is to gain a more detailed understanding of the licensee's process to implement risk-informed categorization and treatment of structures, systems and components as proposed in the LAR. The NRC staff will audit internal events and fire probabilistic risk assessment (PRA) and the risk informed approach implementing 10 CFR 50.69.

The areas of focus for the regulatory audit are the information contained in the licensee's submittal, the enclosed audit information needs, and all associated and relevant supporting documentation (e.g., methodology, process information, calculations, etc.) identified below. The audit will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, Revision 1, "Regulatory Audits," dated October 31, 2019 (ADAMS Accession No. ML19226A274).

### 4.0 INFORMATION REQUESTS

Please provide the following information for the NRC staff to audit:

1. Applicable peer review reports and closure reports for internal events, internal flooding, fire and seismic PRAs.
2. Available 10 CFR 50.69 structures, systems, and components categorization program procedures (i.e., Categorization review and adjustment process, decision criteria for Independent Decision-Making Panel (IDP), etc.).
3. Uncertainty notebooks for internal events, internal flooding, and fire PRAs related to PRA model assumptions and sources of uncertainty.
4. Documentation of review of PRA model assumptions and sources of uncertainty and identification of key assumptions and sources of uncertainty for the application identified in the LAR.
5. PRA notebooks for the modeling of FLEX equipment and FLEX human error probabilities, if credited in the PRA

### 5.0 AUDIT TEAM

Key licensee personnel involved in the development of the LAR should be made available for interactions on a mutually agreeable schedule to respond to any questions from the NRC staff.

| <b>Team Member</b> | <b>Division</b>                       | <b>Area of Responsibility</b> |
|--------------------|---------------------------------------|-------------------------------|
| Michael Wentzel    | NRR/DORL/LPLII-2                      | Project Management            |
| Mihaela Biro       | NRR/DRA/APLA                          | Technical Review              |
| Jigar Patel        | NRR/DRA/APLA                          | Technical Review              |
| Shilp Vasavada     | NRR/DRA/APLC                          | Technical Review              |
| De Wu              | NRR/DRA/APLC                          | Technical Review              |
| Garill Coles       | Pacific Northwest National Laboratory | Technical Review              |

## 6.0 LOGISTICS

The audit will be conducted from December 7, 2020 to January 20, 2021 through an online portal established by the licensee. The NRC staff and contractor's access to the online portal should be terminated on February 19, 2021.

## 7.0 SPECIAL REQUESTS

The NRC staff would like access to the documents listed above in Section 4.0 through an online portal that allows the NRC staff and contractors to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the NRC staff and contractors have access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff and contractors who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.

Username and password information should be provided directly to the NRC staff and contractors. The NRC project manager will provide TVA the names and contact information of the NRC staff and contractors who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

## 7.0 DELIVERABLES

The NRC team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 90 days of the completion of the final audit session. The audit information the NRC staff determines to be necessary to support the development of the NRC staff's safety evaluation will be requested to be submitted on the docket.