



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

January 7, 2021

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-2	0040	Notification of Unusual Event	12/08/2020
EPIP-3	0043	Alert	12/08/2020
EPIP-4	0042	Site Area Emergency	12/08/2020
EPIP-5	0057	General Emergency	12/08/2020
EPIP-6	0042 0043	Activation and Operation of the Technical Support Center (TSC)	12/08/2020
EPIP-7	0037 0038	Activation and Operation of the Operations Support Center (OSC)	12/08/2020
EPIP-12	0023	Emergency Equipment and Supplies	12/08/2020
EPIP-13	0026	Dose Assessment	12/08/2020

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

### Non-Editorial Changes Made with Prior Approval

- I. EPIP-2 Revision 40, EPIP-3 Revision 43, EPIP-4 Revision 42, EPIP-5 Revision 57, EPIP-6 Revision 42, EPIP-7 Revision 37, and EPIP-13 Revision 26 include changes resulting from NRC approval of Emergency Response Organization (ERO) staffing changes in the Safety Evaluation Report (SER) (ML20085G896) for BFN Amendments 312, 335, and 295 (ML19262F378). These changes were screened collectively because the justification for making them was the same. This activity was determined to be a change to the REP that was not editorial or typographical in nature, but was also determined to conform to an activity that has prior approval. Therefore, the activity was allowed to be implemented without performing a 50.54(q) reduction in effectiveness evaluation.
- II. EPIP-4 Revision 42 and EPIP-5 Revision 57 include the following changes related to notification of the State of Alabama of a declared emergency. Replaced “not to exceed 15 minutes” with “within 15 minutes” in:
  - i. EPIP-4 Revision 42
    - Note box before section 1.0 of Attachment 7.
  - ii. EPIP-5 Revision 57
    - Note box in section 3.1 of main body.
    - Note box in section 1.0 of Attachment 7.

The changes aligned the verbiage in EPIP-5 related to the time requirement for notification of the State and local government agencies with the verbiage detailed in 10 CFR 50, Appendix E, section IV paragraph D.3. These changes were screened collectively because the justification for making them was the same. This activity was determined to be a change to the Radiological Emergency Plan (REP) that was not editorial or typographical in nature, but was also determined to conform to an activity that has prior approval. Specifically:

- 10 CFR 50, Appendix E, section IV.D.3 states, in part, “A licensee shall have the capability to notify responsible State and local governmental agencies within fifteen minutes after declaring an emergency.”
- The Radiological Emergency Plan (Generic Part) (REP-Generic) step 4.2C state, “TVA maintains the capability to assess, classify, and declare an emergency condition within fifteen minutes after the availability of indication to plant operators that an Emergency Action Level (EAL) has been exceeded and promptly declare the emergency condition upon identification of the appropriate EAL.”
- The REP-Generic step 5.2.1A states, “The Main Control Room (MCR) notifies and relays the information to the State within 15 minutes of declaration of the event.”
- The REP-Generic step 5.2.4C states, “If this is the initial classification, the MCR notifies the local government agencies within 15 minutes, and passes along the PARs.”

The changes ensure that the verbiage in the procedure mirrors the verbiage found in the regulation and section of the REP-Generic cited above. Therefore, the activity was allowed to be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

#### Non-Editorial Changes without Prior Approval

- I. EPIP-5 Revision 57 includes the following changes:
  - i. Changes to Attachment 10, Upgrade – Protective Action Recommendation (PAR), to clarify the intent of the procedure related to identification of previously affected sectors when conducting a PAR upgrade. Planning Standards 50.47(b)(5) – Notification Methods and Procedures, and 50.47(b)(10) – Protective Response, were determined to be impacted by this change.
  - ii. Instruction related to the form to be used when conducting a PAR upgrade to all instruction related to making necessary emergency notifications. Planning Standards 50.47(b)(5) – Notification Methods and Procedures, and 50.47(b)(10) – Protective Response, were determined to be impacted by this change.
  - iii. Instruction to communicate to the CECC Director the EALs used to determine that a General Emergency (GE) is warranted using the Initiating Condition FG1. This enhancement ensures that, during a GE declared on IC FG1, the EALs used to make this determination are documented and communicated to the CECC Director. Planning Standards 50.47(b)(5) – Notification Methods and Procedures, and 50.47(b)(6) – Emergency Communications, were determined to be impacted by this change.
- II. EPIP-2 Revision 40, EPIP-3 Revision 43, EPIP-4 Revision 42, EPIP-5 Revision 57, EPIP-6 Revision 42, and EPIP-7 Revision 37 contain changes that instruct ERO staff to ensure that Dose Assessment is given priority over Chemistry sampling activities to be performed in response to a radiological emergency. Planning Standard 50.47(b)(9) – Accident Assessment, was determined to be impacted by these changes.
- III. EPIP-6 Revision 42 and EPIP-7 Revision 37 contain changes to ERO position tasks and responsibilities that are needed as a result of the ERO staffing changes documented in BFN's LAR/SER (ML19262F378/ML20085G896). Planning Standard 50.47(b)(1) – Assignment of Responsibility (Organization Control), was determined to be impacted by these changes.

- IV. EPIP-12 Revision 23 made the following changes which were not editorial or typographical:
- i. Added five portable generators, to be used to power the charging devices for the five portable satellite phones in the BFN Technical Support Center, to the “Supplies” table in Attachment 1. Planning Standards 50.47(b)(8) – Emergency Facility was determined to be impacted by this change.
  - ii. Replaced “Bicron ISM (RSO-5 or 50)” with “Ion Chamber Survey Meter” because the Bicron ion chamber survey meters are no longer in use for this purpose. Planning Standards 50.47(b)(8) – Emergency Facility and Equipment, and 50.47(b)(12) – Medical and Public Health Support, were determined to be impacted by this change.
- V. EPIP-13 Revision 26 updates all instruction related to the results of performing actions in SPDS/PEDS when performing dose assessment. Planning Standard 50.47(b)(9) – Accident Assessment, was determined to be impacted by this change.
- VI. EPIP-7 Revision 37 relocates the staging area in the initial stages of an emergency response for Fire/Medical Emergency response team from the OSC Staging Area to the Fire Operations Building. Planning Standards 50.47(b)(2) – Onsite Emergency Organization, and 50.47(b)(12) – Medical and Public Health Support, were determined to be impacted by this change.
- VII. EPIP-6 Revision 43 and EPIP-7 Revision 38 remove the following position checklists:
- i. EPIP-6
    - TSC Assistant Radiation Protection Manager
  - ii. EPIP-7
    - OSC Engineer I&C
    - OSC Engineer Mechanical
    - OSC Engineer Electrical

Planning Standards 50.47(b)(1) – Assignment of Responsibility (Organization Control), and 50.47(b)(2) – Onsite Emergency Organization, were determined to be impacted by these changes.

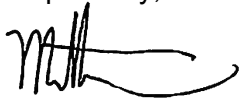
These changes were determined to be changes to the REP that were not editorial or typographical in nature. These changes were also determined to not conform to an activity that has prior approval. 10 CFR 50.47(b) Planning Standards were determined to be impacted by these changes; therefore, it was concluded that these activities could not be implemented without performing 50.54(q) reduction in effectiveness evaluations. Upon completion of the Effectiveness Evaluation Form for each activity it was concluded that all activities continue to comply with the requirements of 50.47(b) and 50 Appendix E, and the activity does not constitute a reduction in effectiveness. Therefore, these activities were allowed to be implemented without prior approval.

Editorial/Typographical Changes

EPIP-2 Revision 40, EPIP-3 Revision 43, EPIP-4 Revision 42, EPIP-5 Revision 57, EPIP-6 Revision 42, EPIP-7 Revision 37, EPIP-12 Revision 23, and EPIP-13 Revision 26 include various changes throughout these documents which were determined to be editorial or typographical in nature and could therefore be 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,

A handwritten signature in black ink, appearing to read 'Matthew Rasmussen', with a stylized flourish at the end.

Matthew Rasmussen  
Site Vice President

cc:

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant  
NRR Project Manager - Browns Ferry Nuclear Plant