



Post Office Box 2000, Decatur, Alabama 35609-2000

August 18, 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	0041	Notification of Unusual Event	07/19/2021
EPIP-3	0044	Alert	07/19/2021
EPIP-4	0043	Site Area Emergency	07/19/2021
EPIP-5	0058	General Emergency	07/19/2021
EPIP-6	0044	Activation and Operation of the Technical Support Center (TSC)	07/19/2021
EPIP-7	0039	Activation and Operation of the Operations Support Center (OSC)	07/19/2021
EPIP-8	0034	Personnel Accountability and Evacuation	07/19/2021

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-12	0024	Emergency Equipment and Supplies	07/19/2021
EPIP-14	0023	Radiological Control Procedures	07/19/2021

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

#### **Non-Editorial Changes Made with Prior Approval**

EPIP-14 Revision 23 moves instruction related to the environmental monitoring vans from section 3.3, "Site Area Emergency Or General Emergency," to section 3.2, "Alert." This change results 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). This change 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.

#### **Non-Editorial Changes without Prior Approval**

- I. EPIP-2 Revision 41, EPIP-3 Revision 44, EPIP-4 Revision 43, EPIP-5 Revision 58, EPIP-6 Revision 44, EPIP-7 Revision 39, and EPIP-12 Revision 24 contain changes that add an alternate method for activating the Emergency Response Organization (ERO) using the existing TVA Enterprise Emergency Notification System (TEENS) method to replace the Emergency Paging System (EPS) as the backup ERO activation method. The titles of Attachment 8 in EPIPs-2 thru 4 and Attachment 9 in EPIP-5 are altered in order to reflect these changes. These changes are evaluated collectively because they are interdependent and the justification for making them is the same. Planning Standards 50.47(b)(2) – Onsite Emergency Organization, 50.47(b)(5) – Notification Methods and Procedures, and 50.47(b)(6) – Emergency Communications, were impacted by these changes.
- II. EPIP-2 Revision 41, EPIP-3 Revision 44, EPIP-4 Revision 43, and EPIP-5 Revision 58 update instruction related to radiological releases in the Initial Notification Forms and Follow-Up Information Forms for each emergency classification level. This revision includes changes to both Attachment 1 and Attachment 6.

#### **Attachment 1:**

- Updates form in each procedure to reduce the burden on the SM/SED during completion of Attachment 1. The changes included removing "Release information not known" and changing the options to "NO," "YES, AIRBORNE Radiological Release," and "YES, LIQUID Radiological Release."
- Adds guidance completion of the form and determination of a radiological release.

Attachment 6 adds a statement to step 6 in each procedure to include information related to a release that is occurring or that has occurred.

These changes are evaluated collectively because the justification for them is the same. Planning Standards 50.47(b)(5) – Notification Methods and Procedures, 50.47(b)(6) – Emergency Communications, 50.47(b)(9) – Accident Assessment, and 50.47(b)(10) – Protective Response, were determined to be impacted by these changes.

- III. EPIP-2 Revision 41, EPIP-3 Revision 44, EPIP-4 Revision 43, and EPIP-5 Revision 58 add instruction to document the time that the State answers the phone during an emergency notification, and rearrange the time and date spaces in Attachment 2, “State of Alabama and Operations Duty Specialist (ODS) Notification,” to align with those in the applicable initial notification forms. Planning Standard 50.47(b)(5) – Notification Methods and Procedures, was determined to be impacted by this change.
- IV. EPIP-5 Revision 58 replaces page 1 of 2 of the current Protective Action Recommendation (PAR) Flowchart with an updated version that expands wording to clarify that POTENTIAL LOSS of Containment is based on Drywell (Primary Containment) radiation values. Planning Standard 50.47(b)(10) – Protective Response was determined to be impacted by this change.
- V. EPIP-7 Revision 39 adds instruction related to preparing to dispatch the radiological environmental monitoring vans prior to the vans being dispatched to Attachments 8 and 17. This will aid in expediting the process to allow the dispatch of the vans to be more efficient, once it is required. Planning Standard 50.47(b)(9) – Accident Assessment, was determined to be impacted by this change.
- VI. EPIP-8 Revision 34 adds instruction to Attachment 3 (formerly Appendix C) to ensure that the emergency has been initiated in the Security computer system. This revision also moves the performance of the public address (PA) announcement in Attachment 3, currently performed prior to activating the assembly and accountability sirens, to after the activation of the sirens. Planning Standard 50.47(b)(10) – Protective Response was determined to be impacted by these changes.
- VII. EPIP-12 Revision 24 moves the Harris Radio VIP Console Users’ Manual from the TSC Assistant RPM booklet to the TSC RPM booklet in the “Procedures” table of Attachment, because the TSC Assistant RPM position no longer exists in the BFN Emergency Response Organization. This revision also changes the performance frequency of Attachment 14, Alternate Decontamination Facility, from “Calendar Quarter” to “Calendar Year”. Planning Standard 50.47(b)(8) – Emergency Facility and Equipment was 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.

#### Non-Editorial Changes Not Requiring Evaluation

EPIP-8 Revision 34 changes section 4.2, Records, to reflect that Attachments 1 and 2 (formerly Appendix A and B) do not create a record. This change was determined to be a change to the REP that was not editorial or typographical in nature. This change was also determined to not conform to an activity that has prior approval. No Planning Standards were determined to be impacted by this change; therefore, it was concluded that this change could be implemented without performing 50.54(q) reduction in effectiveness evaluations, and without prior NRC approval.

#### Editorial/Typographical Changes

- I. EPIP-5 Revision 58 replaces page 1 of 2 of the current Protective Action Recommendation (PAR) Flowchart with an updated version that includes the following changes:
  - Notes 4 and 5 are reformatted to define a rapidly progressing severe accident (RPSA) to reflect the format used in Ops procedures for “AND/EITHER/OR” logic.
  - Moved the EAL and IC designators in each note to the beginning of the statement and add clarifying information to validate that Primary Containment is synonymous with Drywell. Drywell is the term more commonly used by personnel familiar with BFN systems.
  
- II. EPIP-2 Revision 41, EPIP-3 Revision 44, EPIP-4 Revision 43, EPIP-5 Revision 58, EPIP-6 Revision 44, EPIP-7 Revision 39, EPIP-8 Revision 34, EPIP-12 Revision 24, and EPIP-14 Revision 23 also include various additional editorial or typographical changes.

These changes were determined to be editorial or typographical in nature and could therefore be implemented without performing 50.54(q) reduction in effectiveness evaluations, and without prior NRC 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.

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Respectfully,

A handwritten signature in black ink, appearing to read 'M. Rasmussen', with a long horizontal flourish extending to the right.

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