



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 3, 2021

LICENSEE: Tennessee Valley Authority

FACILITY: Browns Ferry Nuclear Plant, Units 1, 2, and 3  
Sequoyah Nuclear Plant, Units 1 and 2  
Watts Bar Nuclear Plant, Units 1 and 2

SUBJECT: SUMMARY OF OCTOBER 13, 2021, TELECONFERENCE WITH TENNESSEE VALLEY AUTHORITY TO DISCUSS PLANNED LICENSE AMENDMENT REQUESTS RELATED TO THE EMERGENCY ACTION LEVEL SCHEME (EPID L-2021-LRM-0096)

On October 13, 2021, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an observation (i.e., public) teleconference with representatives of Tennessee Valley Authority (TVA) to discuss planned license amendment requests (LARs) related to the emergency action level (EAL) scheme for Browns Ferry Nuclear Plant, Units 1, 2, and 3 (Browns Ferry); Sequoyah Nuclear Plant, Units 1 and 2 (Sequoyah); and Watts Bar Nuclear Plant, Units 1 and 2 (Watts Bar). The meeting notice and agenda, dated July 27, 2021, are available at Agencywide Documents Access and Management System (ADAMS) Accession No. ML21264A025. TVA's presentation slides for the meeting are available at ADAMS Accession No. ML21281A228. A list of participants is enclosed. No regulatory decisions were made at this meeting.

TVA plans to submit LARs for its three nuclear sites to change their EAL scheme to make an exception in the initiating condition HU2 (seismic event greater than operating basis earthquake (OBE) levels) to provide an additional method to declare the event if the OBE seismic alarm is out of service. TVA stated that the proposed change is consistent with the NRC-approved guidance in Nuclear Energy Institute (NEI) 99-01, "Development of Emergency Action Levels for Non-Passive Reactors," Revision 6, dated November 2012 (ADAMS Accession No. ML12326A805), which is used at all three sites.

As explained by TVA, under the current NRC-approved EAL scheme, there is no method of determining an OBE event if the seismic monitoring equipment is out of service. This forces the Shift Manager or Shift Emergency Director to seek additional guidance in order to make a declaration within 15 minutes of a potential event. The proposed change will prevent avoidable notifications of unusual events by giving the operators more flexibility to determine if an OBE event has occurred. TVA proposes to add an "OR" statement the HU2 initiating condition for when the seismic monitoring equipment is no available AND any one of three quantifiable earthquake measures is confirmed within 15 minutes of the event. The proposed change is essentially the same for all three sites and includes guidance from Regulatory Guide 1.166, "Pre-Earthquake Planning and Immediate Nuclear Power Plant Operator Post-earthquake Actions," and the sites' abnormal operating procedures for earthquakes. The NRC staff noted that TVA may have limited the Shift Manager's flexibility by the proposed specific criteria. TVA responded that the addition of the proposed Note that reads, in part, "...in manner deemed

appropriate by the Shift Manager or Emergency Director...” does provide the plant with some flexibility.

TVA cited precedence for the proposed change by referring to an LAR submitted by Exelon (ADAMS Accession No. ML17164A139) that was subsequently approved by the NRC (ADAMS Accession No. ML18137A614). Mr. Hallman, from the Alabama Department of Public Health, asked the NRC if any other plants could request this amendment based on the precedence. The NRC staff responded that there’s currently no need to require licensees to change their EAL schemes; however, licensees can request such a change if they choose to do so.

TVA plans to submit the LARs in November 2021 and request approval within 1 year following the submittal.

No public meeting feedback was received.

Please direct any inquiries to me at 301-415-1627 or by e-mail to [Kimberly.Green@nrc.gov](mailto:Kimberly.Green@nrc.gov).

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Plant Licensing Branch II-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos.: 50-259, 50-260, and 50-296  
50-327 and 50-328  
50-390 and 50-391

Enclosure: List of Participants

cc: Listserv

LIST OF PARTICIPANTS

OCTOBER 13, 2021, TELECONFERENCE WITH TENNESSEE VALLEY AUTHORITY  
PLANNED LICENSE AMENDMENT REQUESTS RELATED TO THE EMERGENCY ACTION

LEVEL SCHEME

<u>Name</u>	<u>Organization</u>
Kim Green	U.S. Nuclear Regulatory Commission (NRC)
Luke Haeg	NRC
Michael Norris	NRC
Ray Hoffman	NRC
John Pelchat	NRC
Edwin Lea	NRC
Lynnea Wilkins	NRC
Andy Taylor	Tennessee Valley Authority (TVA)
Beau Eckerman	TVA
John Callahan	TVA
Paul Parashak	TVA
Walt Lee	TVA
Paul Gain	TVA
Penny Selman	TVA
Jerry Bingaman	State of Tennessee
Tammy Vinson	Lawrence County, Alabama, Emergency Management Agency
Kevin Petty	Tennessee Emergency Management Agency
Quinton Dailey	Alabama Emergency Management Agency
Michael Hallman	Alabama Department of Public Health
Andrew Holcomb	Tennessee Department of Environment and Conservation, Emergency Planning, Radiological Health
Randi Hendrix	Federal Emergency Management Agency, Region 4
Erica Houghton	Federal Emergency Management Agency, Region 4
Don Mothena	Arizona Public Service
Trent Limestone	

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**ADAMS Accession No.: ML21291A009**

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DATE	10/14/2021	10/27/2021	11/3/2021	11/3/2021

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