



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

December 9, 2021

Mr. Jim Barstow
Vice President Nuclear Regulatory Affairs & Support Services
Tennessee Valley Authority
1101 Market Street, LP 4A-C
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT, UNITS 1, 2, AND 3 – NOTIFICATION OF AN NRC FIRE PROTECTION TEAM INSPECTION (FPTI) (NRC INSPECTION REPORT 05000259/2022010, 05000260/2022010, AND 05000296/2022010) AND REQUEST FOR INFORMATION (RFI)

Dear Mr. Barstow:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region II staff will conduct a fire protection team inspection at the Browns Ferry Nuclear Plant, Units 1, 2, and 3 in January 2022. The inspection team will be led by Mr. Philipp Braaten, a Senior Reactor Inspector from the NRC Region II Office. The inspection team will be comprised of four inspectors from the NRC Region II office. The inspection will be conducted in accordance with Inspection Procedure 71111, Attachment 21N.05, "Fire Protection Team Inspection," the NRC's baseline fire protection inspection procedure.

On December 2, 2021, during a telephone conversation between Ryan Coons of your staff and Mr. Braaten, our respective staffs confirmed arrangements for a two-week inspection. The schedule for the inspection is as follows:

- Week 1 of inspection: January 31 – February 4, 2022
- Week 2 of inspection: February 14 – 18, 2022

Given the ever changing and dynamic situation surrounding the COVID-19 pandemic, the NRC staff and licensee staff will need to remain flexible regarding the conduct of the inspection. The NRC's goal is to complete the baseline inspections in a smart and safe manner.

The team lead and senior reactor analyst will work with your staff prior to the start of the inspection to select the scope of structures, systems, and components for evaluation; identify additional documents needed to support the inspection; and obtain unescorted access.

The enclosure to this letter provides an initial list of the documents the team will need for their review. We request that your staff transmit copies of the documents listed in the enclosure to the NRC Region II office for team use in preparation for the inspection. Please send this information so that it will arrive in the NRC Region II office by the dates listed in the enclosure. During the weeks leading up to the inspection, the team leader will discuss with your staff the following inspection support administrative details: (1) office space size and location; (2) specific documents requested to be made available to the team in their office spaces; (3) arrangements for reactor site access (including radiation protection training, security, safety, and fitness for duty requirements); and (4) the availability of knowledgeable plant staff and

licensing organization personnel to serve as points of contact during the inspection; (5) the details for COVID-19 precautions and site policies for COVID-19 (masks, social distancing, temperature checks, etc.).

We request that during the on-site inspection weeks you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the station fire protection program, including the success path necessary to achieve and maintain the nuclear safety performance criteria, be readily accessible to the team for their review. Of specific interest for the fire protection portion of the inspection are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance (i.e., fire protection compliance assessment documents). Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe and stable plant conditions, including the electrical aspects of the nuclear safety capability assessment, reactor plant fire protection systems and features, and the station fire protection program and its implementation.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget under control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding." Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection or the inspection team's information or logistical needs, please contact Philipp Braaten, the team lead inspector, in the Region II office at (404) 997-4651 or philipp.braaten@nrc.gov or me at (404) 997-4521.

Sincerely,

/RA/

Scott Shaeffer, Chief
Engineering Branch 2
Division of Reactor Safety

Docket No. 50-259, 50-260, 50-296
License No. DPR-33, DPR-52, DPR-68

Enclosures:
Fire Protection Team Inspection Document Request

cc w/enclosure: Distribution via LISTSERV

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 Dated December 9, 2021

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NAME	P. Braaten	S. Shaeffer			
DATE	12/9/2021	12/9/2021			

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Fire Protection Team Inspection Document Request

The initial request for information (i.e., first RFI) concentrates on providing the inspection team with the general information necessary to select appropriate samples to develop a site-specific inspection plan. The first RFI's requested information is specified below in items A.1 thru A.22, and is requested to be provided by January 7, 2022, or sooner, to facilitate the selection of the specific items that will be reviewed during the onsite inspection weeks.

Electronic format is the preferred format, except where specifically noted. If electronic files are made available via a secure document management service, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office.

If a secure document management service is utilized, it is recommended that a separate folder be used corresponding to each item listed below. Documents should be identified by both document number and name. Electronic media on compact disc or paper records (hard copy) are also acceptable.

The inspection team will examine the returned documentation from the first RFI and identify/select specific samples to provide a more focused follow-up request to develop the second RFI. The inspection team will submit the specific selected samples to your staff by January 12, 2022. We request that the additional information provided from the second RFI be made available by January 24, 2022.

This document request is based on typical documents that a generic plant might have. As such, this generic document request is not meant to imply that any specific plant is required to have all of the listed documents. It is recognized that some documents listed below may not be available for your plant. In addition, the document titles listed below are based on typical industry document names; your plant-specific document titles may vary.

A. DESIGN AND LICENSING BASIS DOCUMENTS

- A.1 The current version of the Fire Protection Program and Fire Hazards Analysis
- A.2 Post-fire safe shutdown analysis (or Post-fire Nuclear Safety Capability, Systems, and Separation Analysis Fire if NFPA 805 licensing basis) and the supporting calculations that demonstrate acceptable plant response.
- A.3 (If NFPA 805 licensing basis) Fire PRA Summary Report, and list of Fire PRA calculations
- A.4 (If NFPA 805 licensing basis) NFPA 805 Transition Report, developed in accordance with NEI 04-02
- A.5 List of post-fire safe shutdown systems and components (i.e., safe shutdown equipment list).
- A.6 List of fire areas with automatic fire suppression systems

Enclosure

- A.7 List, with descriptions, of design change packages performed since the last fire protection team inspection associated with fire protection or post-fire safe shutdown systems.
- A.8 List, with descriptions, of any fire protection program changes and evaluations (not limited to Generic Letter 86-10 evaluations) performed since the last fire protection team inspection
- A.9 Fire Protection System(s) Design Basis Document.
- A.10 List of applicable NFPA codes and standards and issuance dates (i.e., codes of record).
- A.11 A list or document identifying any deviations from the NFPA codes of record.
- A.12 Facility Operating License.
- A.13 Technical Specifications (electronic format only).
- A.14 Updated Final Safety Analysis Report (electronic format only).
- A.15 COPY of NRC Safety Evaluation Reports that form the licensing basis for:
- Fire Protection Program; and
 - Post-fire Nuclear Safety Capability
- A.16 COPY of NRC approved exemptions for plant fire protection and post-fire nuclear safety capability features.
- A.17 COPY of exemption requests submitted but not yet approved for plant fire protection and post-fire nuclear safety capability features.
- A.18 LIST of nuclear safety capability design changes completed in the last three years (including their associated 10 CFR 50.59 and NFPA 805 plant change evaluations).
- A.19 List of the top 25 highest fire CDF scenarios for each unit
- A.20 List of the top 25 highest fire LERF scenarios for each unit
- A.21 From your most recent PRA including external events and fires:
- Two risk rankings of components from your site-specific PRA: one sorted by Risk Achievement Worth (RAW), and the other sorted by Birnbaum Importance
 - A list of the top 500 cut-sets
- A.22 Copy of the Quality Assurance Program Manual (including specific fire protection QA manual, if applicable)