

From: Green, Kimberly
Sent: Tuesday, May 3, 2022 1:48 PM
To: Williams, Gordon Robert
Subject: Acceptance Review Results for Browns Ferry Nuclear Plant, Units 1, 2, and 3, License Amendment Request to Adopt TSTF-505 and TSTF-439 (EPID L-2022-LLA-0049)

Dear Mr. Williams:

By letter dated March 31, 2022 (Agencywide Documents Access and Management System Accession No. ML22090A287), the Tennessee Valley Authority (TVA) submitted a license amendment request (LAR) for the Browns Ferry Nuclear Plant (Browns Ferry), Units 1, 2, and 3. The proposed amendments would revise the Browns Ferry technical specification requirements to permit the use of risk-informed completion times in accordance with Technical Specification Task Force (TSTF)-505-A, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4b." Consistent with TSTF-439-A, "Eliminate Second Completion Times Limiting Time from Discovery of Failure to Meet an LCO," the proposed amendments would also revise the TSSs to delete all second Completion Times contained in the Browns Ferry TSSs, revise the Completion Times Example 1.3-3 to eliminate the second Completion Times contained within, and revise the discussion in the Example to state that alternating between Conditions in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO is inconsistent with the basis of the Completion Times and is inappropriate.

The purpose of this email is to provide the results of the U.S. Nuclear Regulatory Commission (NRC) staff's acceptance review of the LAR. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations*, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following as far as applicable, the form prescribed for original applications. The NRC staff has reviewed TVA's LAR and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in TVA's submittal, the NRC staff has estimated that this licensing request will take approximately 1,850 of NRC staff hours to complete and that the review can be completed by May 3, 2023. The NRC staff's review will be complemented by a contractor review. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates will be communicated, during our routine interactions. These estimates are based on the staff's initial review of the application

and they could change, due to several factors including requests for additional information and unanticipated addition of scope to the review.

If you have any questions, please contact me at (301) 415-1627.

Sincerely,
Kimberly J. Green, Senior Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

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