

From: Kimberly Green
Sent: Wednesday, September 14, 2022 3:53 PM
To: Eckermann, Jeremy Beau
Cc: Victor, William Ross
Subject: Browns Ferry TSTF-505 Audit Questions - Part 5 (EPID L-2022-LLA-0049)
Attachments: BFN TSTF-505 Audit Questions Part 5.docx

Beau,

The June 14, 2022, Audit Plan (ML22147A137) states that “[t]hroughout the audit period, the NRC staff will submit audit questions and audit-related requests to TVA so that TVA can better prepare for audit discussions with NRC staff.” Attached is the fifth set of NRC staff audit questions.

We look forward to discussing this question and TVA’s response during the virtual audit meeting that is currently taking place. Please contact me at any time prior if a clarification discussion is needed.

Please post the response for the question to the Certrec Portal when the response is completed.

Let me know if you have any questions.

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**AUDIT QUESTIONS
LICENSE AMENDMENT REQUEST
TO REVISE TECHNICAL SPECIFICATIONS
TO ADOPT TSTF-505, REVISION 2
TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT UNITS 1, 2, AND 3
DOCKET NOS. 50-259, 50-260, AND 50-296**

Question 25 (APLC) –Difference Between CDF and LERF Mean and Point Estimate Values

In response to NRC staff's Audit Question 6, TVA provided updated values for CDF and LERF from internal events, fire, and seismic PRA for all three units. The staff notes that the mean values are greater than the point estimate of these quantities for all cases considered, and the differences are greater than 2 percent. Section 1 of Enclosure 9 to the LAR states. "A comparison of CDF results from the normal model quantification and the parametric uncertainty evaluation shows that the difference between the point estimate and mean results is less than 2%. Therefore, SOKC is not a key source of uncertainty for the TSTF-505 application." The cited statement appears to contradict TVA's response to Audit Question 6. Explain this apparent contradiction or correct the cited statements to make them consistent with the updated PRA results.