



Post Office Box 2000, Decatur, Alabama 35609-2000

October 13, 2022

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 (REP). The affected document is the BFN Emergency Plan Implementing Procedure (EPIP) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-1	0063	Emergency Classification Procedure	09/13/2022

Description of Changes and Summary of Analysis

EPIP-1 Revision 63 incorporates language from EP Frequently Asked Question (FAQ) 2018-04 into the bases for initiating conditions CA6 and SA9. The FAQ clarifies how an event leading to indications of degraded performance and/or visible damage should be classified when:

1. The event affects equipment common to two or more safety systems or safety system trains.
2. The event affects a safety system that has only one train.
3. The event affects two trains of a safety system having more than two trains.

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 activities that had prior NRC approval. Planning Standard 50.47(b)(4) – Emergency Classification System was impacted by this change;

therefore, it was concluded that the change could not be implemented without performing a 50.54(q) reduction in effectiveness evaluation. Upon completion of the Effectiveness Evaluation Form for this change, it was concluded that the change continues to comply with the requirements of 50.47(b) and 50 Appendix E, and that the change does not constitute a reduction in effectiveness. Therefore, this change was allowed to be implemented without prior NRC approval.

Additionally, EPIP-1, Revision 63 included changes to the table of contents which were determined to be editorial or typographical in nature and could therefore be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

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.

Respectfully,



Manu Sivaraman
Site Vice President

cc:

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant