



Post Office Box 2000, Decatur, Alabama 35609-2000

November 23, 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-6	0045	Activation and Operation of the Technical Support Center (TSC)	10/25/2022
EPIP-7	0040	Activation and Operation of the Operations Support Center (OSC)	10/25/2022
EPIP-12	0026	Emergency Equipment and Supplies	10/25/2022

Description of Changes and Summary of Analysis

Changes requiring a 50.54(q) reduction in effectiveness evaluation:

1. EPIP-6 Revision 45 adds necessary instruction to Attachment 19 for the Control Room Communicator related to establishing contact with the OSC and TSC personnel. Planning Standard 50.47(b)(6) – Emergency Communications was impacted by this change.

2. EPIP-6 Revision 45 adds instruction to Attachment 12 for the TSC Radiation Protection Manager (RPM) to include a review of Dose Assessment Assumptions and other WebEOC boards including BFN Field Data, BFN Radiological Assessment, BFN Isotopic Mix Determination and BFN Release Flowchart. Planning Standard 50.47(b)(9) – Accident Assessment was impacted by this change.
3. EPIP-7 Revision 40 adds instruction to the Operational Responsibilities section of Attachment 8 for the OSC RP Briefer to update the OSC when the REP Vans have been dispatched; and adds examples to Attachment 8, OSC RP Briefer Checklist, of teams to be tracked in the OSC during response to an emergency. Planning Standard 50.47(b)(9) – Accident Assessment was impacted by these changes.
4. EPIP-7 Revision 40 and EPIP-12 Revision 26 remove instruction related to the OSC/OSC Staging Area PA system. Planning Standards 50.47(b)(6) – Emergency Communications, and 50.47(b)(8) – Emergency Facility and Equipment, were impacted by this change.

These changes were determined to be changes to the REP that were not editorial or typographical in nature. These changes were also determined to not conform to activities that had prior NRC approval. 10 CFR 50.47(b) Planning Standards were impacted by these changes; therefore, it was concluded that these changes could not be implemented without performing a 50.54(q) reduction in effectiveness evaluation. Upon completion of the Effectiveness Evaluation Form for these changes, it was concluded that the changes continue to comply with the requirements of 50.47(b) and 50 Appendix E, and that the changes do not constitute a reduction in effectiveness. Therefore, these changes were allowed to be implemented without prior NRC approval.

Changes which did not require a 50.54(q) reduction in effectiveness evaluation:

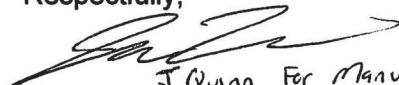
EPIP-6 Revision 45 adds clarifying instruction to the Operational Responsibilities section of Attachment 2, Site Emergency Director Checklist, related to when to invoke 10 CFR 50.54(x) as a means of responding to an emergency. This change was determined to be a change to the REP that was not editorial or typographical in nature. This change was also determined to not conform to activities that had prior NRC approval. No 10 CFR 50.47(b) Planning Standards were impacted by this change; therefore, it was concluded that the change could be implemented without performing a 50.54(q) reduction in effectiveness evaluation, and that the change was allowed to be implemented without prior NRC approval.

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Additionally, EPIP-7, Revision 40 includes changes 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,


J. Quinn For Manu Sivaraman
11-22-2022

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