



Post Office Box 2000, Decatur, Alabama 35609-2000

May 31, 2023

10 CFR 50.54(q)
10 CFR 50, Appendix E
10 CFR 72.44(f)

ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 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-5	0063	General Emergency	5/01/2023

Description of Changes and Summary of Analysis

EPIP-5 Revision 63 updates the Radiological Emergency Plan Protective Action Recommendation strategy in order to eliminate the use of staged evacuation in scenarios when there is no hostile action, Rapidly Progressing Severe Accident (RPSA), known impediments to evacuation, or short term release. The change will cause Recommendation 3 to be updated to replace shelter 5 miles downwind with evacuate 5 miles downwind. In addition, Recommendation 6, concerning site specific time lapse since evacuation began will be removed completely, along with the associated notes. Since the 5 miles downwind will be evacuated, there is no longer a need for the site specific time lapse since evacuation began, and thus Recommendation 6 no longer applies. These changes are being made based on decennial update to the evacuation time estimations performed

for each site by KLD and evaluated in accordance with NEI 12-10, Guideline for Developing a Licensee Protective Action Recommendation Guide Procedure Using NUREG-0654 Supplement 3.

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. Planning Standards 10 CFR 50.47(b)(5) – Notification Methods and Procedures, and 50.47(b)(10) – Protective Response were impacted by these changes; therefore, it was concluded that the 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.

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