



Post Office Box 2000, Decatur, Alabama 35609-2000

August 20, 2025

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 Revisions

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 documents are the BFN Emergency Plan Implementing Procedures (EIPs) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-2	48	Notification of Unusual Event	07/21/2025
EPIP-3	52	Alert	07/21/2025
EPIP-4	52	Site Area Emergency	07/21/2025
EPIP-5	69	General Emergency	07/21/2025
EPIP-8	38	Personnel Accountability and Evacuation	08/06/2025

Description of Changes and Summary of Analysis

EPIP-2, Revision 48; EPIP-3, Revision 52; EPIP-4, Revision 52; and EPIP-5, Revision 69, update Block 1 of the table in Section 2.0, Radiological Release Determination Guidance, of Attachment 1 of each EPIP. This activity is a change to the REP that is not editorial or typographical. The changes do not conform to an activity that has prior approval. It was

determined that multiple 10 CFR 50.47(b) Planning Standards were impacted by these changes; therefore, the activity 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 activity continues to comply with the requirements of 50.47(b) and 50 Appendix E, and the activity does not constitute a reduction in effectiveness. Therefore, these changes were allowed to be implemented without prior NRC approval.

In addition, EPIP-5, Revision 69, also incorporated a change to Step 6 of Attachment 1. The activity was a change to the REP; however, it was determined to be editorial or typographical. Therefore, it was determined that the change could be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

EPIP-8, Revision 38, makes several updates to Attachment 3, Nuclear Security-Assembly and Accountability Actions. Steps 1.0[4] and 1.0[5] were revised to reduce the number of phone calls in the Control Room from two to one, which results in renumbering all remaining steps in section 1.0. In addition, Steps 1.[20], [20.1], and [20.2] were rewritten to replace "Owner Controlled Area" and "(OCA)" with "site" to ensure the steps are better aligned with the REP. The activity is a change to the REP that is not editorial or typographical. The change does not conform to an activity that has prior approval. It was determined that 10 CFR 50.47(b)(10) (Protective Response) was impacted by this change; therefore, the activity 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 activity continues to comply with the requirements of 50.47(b) and 50 Appendix E, and the activity does not constitute a reduction in effectiveness. Therefore, the activity was implemented without prior approval.

There are no new regulatory commitments in this letter. If you have any questions regarding this submittal, please contact Emily J. Cole, Site Emergency Preparedness Manger, at (256)729-4742.

Respectfully,



Daniel A. Komm
Site Vice President

Enclosure

Browns Ferry Nuclear Plant – Site Emergency Plan Implementing Procedure Revisions

cc: (w/ Enclosure)

NRC Regional Administrator - Region II

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NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant