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March 4, 2009

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop OWFN, P1-35
Washington, D.C. 20555-0001

In the Matter of)	Docket Nos. 50-259
Tennessee Valley Authority)	50-260
		50-296

BROWNS FERRY NUCLEAR PLANT (BFN) - UNITS 1, 2, AND 3 - LETTER OF INTENT TO ADOPT NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) 805, PERFORMANCE-BASED STANDARD FOR FIRE PROTECTION FOR LIGHT WATER REACTOR GENERATING PLANTS, 2001 EDITION

The purpose of this letter is to inform NRC that TVA intends to adopt NFPA Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition," at BFN in accordance with 10 CFR 50.48(c).

BFN is beginning the transition to the performance-based standard for fire protection. It is expected to take approximately thirty-six months to develop a License Amendment Request to adopt NFPA 805, as required by 10 CFR 50.48(c).

10 CFR 50.48(c), in conjunction with NFPA 805, provides an alternate, performance-based method to comply with NRC fire protection requirements. NRC has encouraged licensees to consider the benefits of transitioning plant fire protection programs from their current prescriptive requirements to the new NFPA 805 standard. TVA recognizes that the overall benefit of NFPA is in ensuring optimum focus on enhancing plant safety through the use of performance-based standards and risk informed decision-making techniques.

The BFN NFPA 805 transition process will consist of three phases:

Phase 1: Preliminary Assessment of the Fire Protection Program

- Assessment to determine the scope of activities and resources needed to perform the transition

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Phase 2: Reviews and Engineering Analysis

- Fire Probabilistic Risk Assessment
- Fundamental Fire Protection Program and Design Elements Assessment
- Radioactive Release Assessment
- Nuclear Safety Capability Assessment
- Non-Power Operational Modes Assessment
- Development of Change Evaluations and Transition Report
- Submittal of License Amendment Request

Phase 3: Implementation

- Completion of Program Document Changes

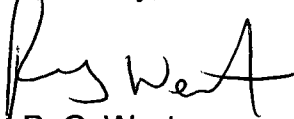
The transition process will be considered complete upon receipt of a License Amendment authorizing the transition to NFPA 805 at BFN.

The NRC Interim Enforcement Discretion Policy (71 FR 19905, April 18, 2006, and Regulatory Guide 1.205, May 2006) established NRC policy regarding enforcement discretion for certain non-compliances related to fire protection programs and the transition to 10 CFR 50.48(c). As outlined in the Enforcement Policy, enforcement discretion begins with the licensee's letter of intent. The Enforcement Policy also provides for extension of the discretion period if adequate justification is provided.

Because the transition to the NFPA performance-based standard is a voluntary initiative, this correspondence contains no regulatory commitments.

If you have any questions or require additional information, please contact F. R. Godwin at (256) 729-2636.

Sincerely,



R. G. West
Site Vice President

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