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February 15, 2013

10 CFR 50.4

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Unit 1  
Facility Operating License No. DPR-33  
NRC Docket No. 50-259

**Subject: Browns Ferry Nuclear Plant, Unit 1, Preparations for Nuclear Regulatory Commission Inspection Procedure 95003**

**References:**

1. Letter from TVA to NRC, "Integrated Improvement Plan Summary," dated August 23, 2012
2. Letter from NRC to TVA, "Final Significance Determination of a Red Finding, Notice of Violation, and Assessment Follow-Up Letter (NRC Inspection Report No. 05000259/2011008) Browns Ferry Nuclear Plant," dated May 9, 2011

By letter dated August 23, 2012 (Reference 1), the Tennessee Valley Authority (TVA) submitted the Browns Ferry Nuclear Plant (BFN) Integrated Improvement Plan Summary (IIPS) to the Nuclear Regulatory Commission (NRC). The IIPS describes the approach used by TVA to guide performance improvement at BFN to sustainable levels of excellence and to reduce station risk. The IIPS was developed by TVA subsequent to the NRC's issuance of a Red Finding and assessment that performance of BFN, Unit 1 was in the Multiple/Repetitive Degraded Cornerstone Column of the NRC Action Matrix (Reference 2).

The IIPS included criteria to be used by TVA leadership to assess BFN readiness for an inspection by the NRC using Inspection Procedure 95003. Those readiness criteria are as follows:

- No risk significant event or condition.
  - Resulting from a cause that would alter the basis of the established plan
  - Resulting from the developed corrective actions being ineffective
- Designated corrective actions have been completed
- Longer-term corrective actions are on schedule

DO30  
NR12

- Performance criteria/metrics indicate adequate performance improvement and sustainability
- Assessments by the governance and oversight organizations support readiness

TVA has evaluated activities and performance at BFN using these criteria. TVA's BFN site and corporate executive leadership have concluded that BFN's performance sufficiently satisfies the inspection readiness criteria and that TVA is prepared for the inspection. The assessment of readiness associated with each of the criteria is discussed below.

With respect to the first criteria, BFN evaluated each of the significant events or conditions that occurred from June 1, 2011 to present for which the associated cause evaluations have been completed. The significant event evaluations were conducted to verify that these events or conditions did not result from (1) a cause that would alter the basis of the established Integrated Improvement Plan or (2) the Plan's corrective actions being ineffective. BFN determined that training contributed to several significant events and conditions which occurred at the station prior to the National Nuclear Accrediting Board placing the Engineering Support Personnel Training Program on probation in October 2012. As a result, BFN completed additional causal analysis and developed actions to correct the condition. These actions have been incorporated into the Integrated Improvement Plan as appropriate.

Regarding designated corrective actions, the BFN Action Closure Review Board has reviewed and approved 150 of 151 designated actions. With respect to the remaining action, TVA determined that the associated documentation did not meet TVA's expectations for objective quality evidence although the action taken was sufficient to support completion of related corrective actions. Therefore, BFN will not consider this action complete until the appropriate objective quality evidence has been developed and approved. This action will be completed prior to the expected start of the inspection.

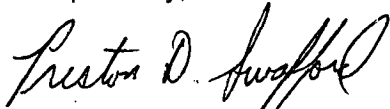
All long-term Integrated Improvement Plan actions open as of February 13, 2013 are on track and will be completed as scheduled. The BFN leadership team has not identified any issues that might adversely affect the scheduled completion of these actions.

With respect to the 95003 performance metrics, the BFN leadership team has concluded that the metrics indicate adequate performance improvement and sustainability sufficient to request the 95003 supplemental inspection. This conclusion is based on: (1) the overall trend of 95003 Performance Metrics demonstrating a meaningful, positive trend in the total number of metrics indicating adequate performance improvement and sustainability (Green); (2) no significant negative trends existing in the three metrics that are not color coded; and (3) an action plan being implemented through the corrective action program for each of the non-Green metrics that is reasonably expected to result in the metrics being Green prior to the onsite portion of the 95003 inspection. One metric, collective radiation exposure may not be Green at the time of the inspection due to upcoming outages, ongoing efforts to improve equipment reliability and ongoing efforts to reduce source term. These efforts are expected to result in long-term sustainable reductions in collective radiation exposure. TVA will continue to carefully monitor performance metric trends and take action to ensure any emergent adverse trends are promptly addressed.

The readiness assessments completed by Quality Assurance (QA), the Nuclear Safety Review Board (NSRB) and the Executive Oversight Board (EOB) support readiness. QA determined that the station has adequately bounded the behaviors and fundamental problem areas for improvement at BFN. The NSRB concluded that there is an adequate understanding of the core issues and sufficient progress to notify the NRC of readiness for the 95003 inspection. The EOB reviewed the status of each of the five readiness criteria and supported a request for the inspection. While these assessments also indicated that there are areas of performance that need continued management attention and improvement to ensure sustainability, these assessments did not identify any new issues or corrective action plans that would prevent a successful 95003 inspection.

Should questions arise regarding this submittal, please contact Keith Polson at (256) 729-3675.

Respectfully,



Preston D. Swafford

cc: NRC Regional Administrator – Region II  
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant  
NRC Project Manager – Browns Ferry Nuclear Plant