

SECURITY-RELATED INFORMATION - WITHHOLD UNDER 10 CFR 2.390.

This letter is decontrolled when separated from the Enclosure.



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-15-087

June 29, 2015

10 CFR 50.4
10 CFR 50.54(f)

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

Watts Bar Nuclear Plant, Unit 2
Construction Permit No. CPPR-92
NRC Docket No. 50-391

Subject: **WATTS BAR NUCLEAR PLANT, UNIT 2 - RESPONSE TO NRC BULLETIN 2011-01, "MITIGATING STRATEGIES"**

- References:
1. Letter from TVA to NRC , "60-Day Response to NRC Bulletin 2011-01, "Mitigating Strategies", dated July 11, 2011
 2. Letter from NRC to TVA dated April 23, 2012, "Watts Bar Nuclear Plant, Unit 1, Closeout of NRC Bulletin 2011-01, "Mitigating Strategies" (TAC No. ME6500)
 3. Letter from TVA to NRC, "Watts Bar Nuclear Plant Units 1 and 2 – Dual Unit Mitigation Strategy Tables", dated September 30, 2014,
 4. Letter from TVA to NRC, "Compliance Letter and Final Integrated Plan in Response to the March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049) for Watts Bar Nuclear Plant, dated March 12, 2015 (TAC Nos. MF0950 and MF1177)"

The purpose of this submittal is to provide a response to Nuclear Regulatory Commission (NRC) Bulletin 2011-01, "Mitigating Strategies," as requested by the staff for the Watt Bar Nuclear Plant (WBN) Unit 2.

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The NRC issued Bulletin 2011-01, "Mitigating Strategies," dated May 11, 2011, and requested that each holder of an operating license for nuclear power reactors provide a comprehensive verification of their compliance with the regulatory requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(hh)(2). Licensees were required to provide a written response to the NRC in accordance with 10 CFR 50.54(f). Tennessee Valley Authority (TVA) submitted a letter on July 11, 2011, providing the WBN Unit 1 60-day response to NRC Bulletin 2011-01 (Reference 1). Because WBN Unit 2 was under construction, a response for WBN Unit 2 was not required at that time. In Reference 2, the NRC concluded that the response was acceptable for WBN Unit 1.

NRC letter dated April 23, 2012 (Reference 2), concluded that the NRC staff had verified that TVA had completed all of the requirements of Bulletin 2011-01 for WBN Unit 1, and no further information or actions under the bulletin was requested at that time.

On September 30, 2014, TVA submitted the dual unit mitigating strategy tables (Reference 3), that described the prearranged strategies developed for dual unit operation at the WBN site to meet the requirements of 10 CFR 50.54(hh) which codifies the requirements previously promulgated by section B.5.b of Order EA-02-026. Reference 3 also indicated that WBN Unit 2 would "follow the prearranged strategies developed for Unit 1 Phase 1 guidance." Reference 3, Enclosure 2, Watts Bar Nuclear Plant (WBN) B.5.b Mitigating Strategies-Summary of Changes, provided a summary of the Mitigating Strategies changes that were necessary to expand the WBN Unit 1 strategies to encompass a dual unit site. These changes serve as the basis for the WBN Unit 2 response, recognizing that the strategies largely employ common equipment, procedures, controls, and training.

Since the majority of the equipment identified in the B.5.b mitigating strategies is common for both units and the Reference 1 Bulletin response was accepted by the NRC and closed by Reference 2, the enclosure only addresses specific WBN Unit 2 equipment required to support the strategies presented in Reference 3.

NRC Bulletin 2011-01 noted that "Events at the Fukushima - Daiichi Nuclear Power Station following the March 11, 2011 earthquake and tsunami highlight the potential importance of B.5.b mitigating strategies in responding to beyond-design-basis events." Subsequently, on March 12, 2012, the NRC issued Order EA-12-049 that directed TVA to implement mitigation strategies for beyond-design-basis external events. On March 12, 2015, TVA submitted the Compliance Letter and Final Integrated Plan (Reference 4) which reported full compliance with Order EA-12-049 for WBN Units 1 and 2.

TVA considers the enclosure to contain security related information and requests that the enclosure be withheld from public disclosure pursuant to 10 CFR 2.390(d)(1).

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There are no new regulatory commitments in this letter. If you have any questions regarding this response, please contact Gordon Arent at (423) 365-2004.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of June 2015.

Respectfully,

A handwritten signature in black ink, appearing to read "J. W. Shea".

J. W. Shea
Vice President, Nuclear Licensing

Enclosure: Watts Bar Nuclear Plant, Unit 2 Response to NRC Bulletin 2011-01,
"Mitigating Strategies"

cc (Enclosure):

NRR Director - NRC Headquarters
NRO Director - NRC Headquarters
NRR JLD Director - NRC Headquarters
NRC Regional Administrator - Region II
NRC Project Manager - Watts Bar Nuclear Plant, Unit 2
NRC Senior Resident Inspector - Watts Bar Nuclear Plant, Unit 2

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