



---

Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

September 29, 2016

10 CFR 50.4  
10 CFR 50.54(q)  
10 CFR 50, Appendix E  
10 CFR 72.44(f)

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

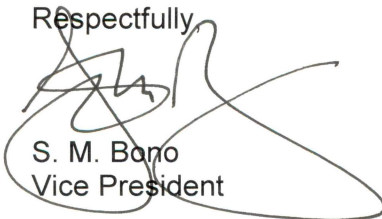
Subject:       **Emergency Plan Implementing Procedure Revision**

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) Part 50.54(q), 10 CFR Part 50, Appendix E, Section V, and 10 CFR 72.44(f). The enclosure provides a summary of the changes and analysis for Browns Ferry Nuclear Plant Emergency Plan Implementing Procedure (EPIP)-7, *Activation and Operation of the Operations Support Center (OSC)*, Revision 34. This enclosure contains both editorial/typographical revisions, as well as non-editorial/typographical substantive revisions, which require an effectiveness evaluation. The evaluation determined the EPIP revision did not reduce the effectiveness, or change or decrease any function or element of the Tennessee Valley Authority Nuclear Power Group Radiological Emergency Plan.

U.S. Nuclear Regulatory Commission  
Page 2  
September 29, 2016

There are no new regulatory commitments in this letter. If you have any questions regarding this EPIP revision, please contact B. F. Tidwell at (256) 729-3666.

Respectfully,



S. M. Bono  
Vice President

Enclosure: Summary of Changes and Analysis for Browns Ferry Nuclear Plant  
Emergency Plan Implementing Procedure

cc (Enclosures):

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant  
Director, Division of Spent Fuel Management, Office of Nuclear Material  
Safety and Safeguards

**Enclosure  
Tennessee Valley Authority  
Browns Ferry Nuclear Plant  
Units 1, 2, and 3**

**Summary of Changes and Analysis for Browns Ferry Nuclear Plant Emergency Plan  
Implementing Procedure**

---

(See Enclosed)

**Summary of Changes and Analysis for Browns Ferry Nuclear Plant EPIP-7,  
Activation and Operation of the Operations Support Center (OSC), Revision 34**

Affected Document	Description of Changes	Description of Analysis
BFN EPIP-7, Revision 34	<p>Removed all instances of the requirement to card into an accountability card reader in the initial actions of an activation of the Emergency Response Organization (ERO). The following steps will be affected by this change:</p> <ul style="list-style-type: none"> <li>• Appendix E, Step 5.0</li> <li>• Appendix L, Step 5.0</li> <li>• Appendix P, Steps 3.0-5.0</li> </ul> <p>The removal of step 3.0 (Revision 33) requires steps 4.0-6.0 (Revision 33) to be renumbered to Steps 3.0-5.0 (Revision 34).</p> <p>Carding into an accountability card reader in the initial stages of an activation of the ERO is unnecessary. In previous revisions of EPIP-7, it was a step that was performed as part of the position checklists contained in the document. EPIP-7, Revision 31 included a change that removed this requirement from the checklists and added instruction to "card into the accountability reader upon notification by; public address (PA) announcement, assembly and accountability sirens, or advice of Nuclear Security personnel" to the notes box at the beginning of each checklist. This change was made as a result of an upgrade in the Site Security computer system. The upgrade included a change to the Assembly and Accountability process. In the event of an initiation of the Assembly and Accountability process, the card readers are cleared and any information transmitted via the card reader prior to the initiation of the system is lost. Therefore, all emergency response personnel would be required to card into the accountability reader a second time.</p>	<p>The proposed change does not change any of the processes, methods, or requirements of performing Assembly and Accountability in accordance with the Emergency plan. This change does not remove the capability to account for all emergency responders onsite within 30 minutes of the start of an emergency, or at any other point in the emergency, and account for all onsite individuals continuously thereafter. They will be accounted for via emergency facility sign-in rosters/boards or the exit turnstile gate records (non-emergency responders) during the initial stages of an activation of the ERO. Therefore, this proposed change continues to comply with the requirements.</p> <p>The proposed change is not a reduction in the effectiveness of the emergency plan, because upon initiation of the Assembly and Accountability process in accordance with EPIP-8, all instances of carding into the accountability card readers prior to the initiation of the system become redundant. Design Change Notice (DCN) 69733 tracked an upgrade of the Site Security computer system that included a feature that clears all of the accountability readers onsite upon initiation of Assembly and Accountability. This requires all ERO members to card into the appropriate accountability reader upon hearing the Accountability/Evacuation siren, PA announcement, or direction from Site Security to perform required actions for Assembly and Accountability. Therefore, carding into an accountability reader before the initiation of Assembly and Accountability process is unnecessary. Additionally, accountability rosters and sign in boards are available for all of Browns Ferry Nuclear Plant's emergency response facilities, and the requirement for ERO personnel to sign in on an accountability roster and sign in board (Operations Support Center (OSC) and Technical Support Center (TSC)) upon activation of the ERO remains unchanged.</p> <p>The change does not constitute a reduction in effectiveness of the REP.</p>



## Summary of Changes and Analysis for Browns Ferry Nuclear Plant EPIP-7, Activation and Operation of the Operations Support Center (OSC), Revision 34

Affected Document	Description of Changes and Analysis
BFN EPIP-7, Revision 34	<p>The following editorial or typographical changes were made:</p> <ul style="list-style-type: none"> <li>• Section 2.2-Added "Procedure" to the title of EPIP-16 to ensure the title is complete and accurate</li> <li>• Section 2.2-Removed spaces around dashes in list</li> <li>• Section 2.2-Added, BFN EPIP-10, "Medical Emergency Procedure," and BFN EPIP-8, "Personnel Accountability and Evacuation"</li> <li>• Removed the position title from the identification step in Appendices B-X</li> <li>• Added a period to the end of the following steps: <ul style="list-style-type: none"> <li>○ Main Body, Step 3.4.F</li> <li>○ Appendix B, Step 3.0 (including all bulleted list items)</li> <li>○ Appendix B, Step 9.0, Emergency Announcement</li> <li>○ Appendix P, Step 4.0</li> <li>○ Appendix P, Operational Responsibilities, first bullet</li> <li>○ Appendix W, Operational Responsibilities, second bullet</li> </ul> </li> <li>• Changed the following phone numbers: <ul style="list-style-type: none"> <li>○ Appendix D, Step 6.0-From "extension 7839" to "729-7839" and "extension 751-1700" to "1-423-751-1700"</li> <li>○ Appendix F, Step 4.0-From "ext. 101" to "ext. 7101"</li> <li>○ Appendix J, Step 4.0-From "extension 2244" to "729-2244"</li> <li>○ Appendix U, Step 4.0-From "(3766)" to "(729-3766)"</li> </ul> </li> <li>• Appendix D, Operational Responsibilities-Replaced "SCBAs" with "Self Contained Breathing Apparatus (SCBA)" in first bullet</li> <li>• Appendix F, Step 6.0-Moved "(EOI Activities)" inside period</li> <li>• Replaced "Verify" with "Ensure" in the following steps to align with the Tennessee Valley Authority Writer's Manual: <ul style="list-style-type: none"> <li>○ Appendix B, Steps 3.0 and 8.0</li> <li>○ Appendix J, Step 3.0</li> <li>○ Appendix K, Step 5.0</li> <li>○ Appendix L, Step 7.0</li> </ul> </li> <li>• Appendix K, Operational Responsibilities-Added dash to "EPIP-10" and title of EPIP-10 to second bullet</li> <li>• Appendix K, Operational Responsibilities-Replaced "OSC Fire Protection Manager" with "OSC Fire Operations Briefer" in third bullet to ensure consistency with the actual title of the position</li> <li>• Appendix L, Operational Responsibilities-Replaced "provides" with "provide" in fourth bullet</li> <li>• Replaced "OSC RP Manager" with "OSC RP Supervisor" in the following steps: <ul style="list-style-type: none"> <li>○ Appendix R, Step 3.0</li> <li>○ Appendix V, Step 5.0</li> <li>○ Appendix X, Step 4.0</li> </ul> </li> <li>• Appendix U, Operational Responsibilities, second bullet-Replaced "TSC Maintenance manager" with "TSC Maintenance Manager"</li> </ul>