



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

CNL-17-039

March 10, 2017

10 CFR 50.4
10 CFR 50.54(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, and 50-296

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating License Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: **RESPONSE TO NRC REQUEST FOR INFORMATION PURSUANT TO
TITLE 10 OF THE *CODE OF FEDERAL REGULATIONS* 50.54(F)
REGARDING RECOMMENDATIONS 2.1, 2.3 AND 9.3 OF THE
NEAR-TERM TASK FORCE REVIEW OF INSIGHTS FROM THE
FUKUSHIMA DAI-ICHI ACCIDENT - WITHDRAWAL OF REGULATORY
COMMITMENTS**

References: 1. TVA Letter to NRC, "Flood Hazard Reevaluation Report for Browns Ferry Nuclear Plant, Response to NRC Request for Information Pursuant to Title 10 of the *Code of Federal Regulations* 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2015 (ML15072A130)

2. TVA Letter to NRC, "Flood Hazard Reevaluation Report for Sequoyah Nuclear Plant, Response to NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 25, 2015 (ML15096A114)
3. TVA Letter to NRC, "Flood Hazard Reevaluation Report for Watts Bar Nuclear Plant, Response to NRC Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3 and 9.3 of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 25, 2015 (ML15084A324)
4. TVA Letter to NRC, "Tennessee Valley Authority - Hydrologic Engineering Center River Analysis System (HEC-RAS) Project Milestones," dated June 22, 2016 (ML16175A518)

In References 1, 2, and 3, TVA submitted the Flood Hazard Reevaluation Reports for Browns Ferry, Sequoyah, and Watts Bar Nuclear Plants, respectively. The Flood Hazard Reevaluation Reports were developed and submitted in response to the NRC letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident," dated March 12, 2012 (ML12053A340).

At the time of the Flood Hazard Reevaluation Report submittals, the guidance for the industry was to perform Integrated Assessments utilizing the reevaluated flood hazards and submit the Integrated Assessments to NRC. Accordingly, TVA committed to perform and submit Integrated Assessments for Browns Ferry, Sequoyah, and Watts Bar Nuclear Plants in references 1, 2, and 3, respectively.

Since the Flood Hazard Reevaluation Reports were submitted, industry and NRC guidance regarding Integrated Assessments has continued to evolve. In NRC's letter dated May 26, 2015 (ML15112A051), it was stated "... the staff is deferring, until further notice, the date for submitting the Integrated Assessment Reports." Guidance for utilizing a graded approach to performing assessments of the reevaluated flood hazards, including the use of a Focused Evaluation, was described in Nuclear Energy Institute (NEI) 16-05, "External Flooding Assessment Guidelines." NRC endorsed the NEI 16-05 guidance in JLD-ISG-2016-01, "Guidance for Activities Related to Near-Term Task Force Recommendation 2.1, Flooding Hazard Reevaluation; Focused Evaluation and Integrated Assessment."

As described in Reference 4, TVA plans to perform Focused Evaluations, consistent with industry guidance, in lieu of Integrated Assessments. Accordingly, TVA withdraws the regulatory commitments made in References 1, 2, and 3 to perform Integrated Assessments.

As committed in Reference 4, TVA will continue to submit status updates on the HEC-RAS project deliverable submittal milestones to the NRC on a six-month frequency. This includes the status of the Focused Evaluations for Browns Ferry, Sequoyah, and Watts Bar Nuclear Plants. The Focused Evaluations are currently planned to be submitted by the end of December 2017.

The enclosure this letter lists the withdrawn commitments described above.

If additional information is needed regarding this update, please contact Russell Thompson at (423) 751-2567.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of March 2017.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

Enclosure:

1. Withdrawn Commitments

cc (Enclosure):

- NRR Director - NRC Headquarters
- NRR JLD Director - NRC Headquarters
- NRC Regional Administrator - Region II
- NRC Project Manager - Browns Ferry Nuclear Plant
- NRC Project Manager - Sequoyah Nuclear Plant
- NRC Project Manager - Watts Bar Nuclear Plant
- NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
- NRC Senior Resident Inspector - Sequoyah Nuclear Plant
- NRC Senior Resident Inspector - Watts Bar Nuclear Plant

ENCLOSURE

WITHDRAWN COMMITMENTS

1. TVA will complete the March 12, 2012, 50.54(f) Request for Information required Integrated Assessment for Browns Ferry Nuclear Plant, Units 1, 2 and 3 and submit a report no later than March 12, 2017.
2. TVA will complete the March 12, 2012, 50.54(f) Request for Information required Integrated Assessment for Sequoyah Nuclear Plant, Units 1 and 2 and submit a report no later than March 12, 2017.
3. TVA will complete the March 12, 2012, 50.54(f) Request for Information required Integrated Assessment for Watts Bar Nuclear Plant, Units 1 and 2 and submit a report no later than March 12, 2017.