



Browns Ferry Nuclear Plant Emergency Response Organization Staffing and Augmentation

License Amendment Request Pre-Submittal Call Meeting
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Participants

Walt Lee, TVA Emergency Preparedness (EP) Director

Josh Perrel, TVA EP Plan and Procedures

Dennis Jones, TVA EP Special Projects

Ed Schrull, TVA Fleet Licensing Manager

Gordon Williams, TVA Fleet Licensing

Brad Tidwell, TVA BFN EP Manager

Monica Ray, Energy Compliance Consultants

Agenda

- Purpose
- Emergency Plan Licensing Basis
- Proposed Changes
- Precedent
- Regulatory Requirements and Guidance
- Schedule
- Conclusion
- Questions

Purpose

To outline proposed Browns Ferry Nuclear Plant (BFN) Emergency Plan changes and the considerations used in development of the License Amendment Request, including:

- Regulatory Requirements
- Regulatory Guidance
- Current NRC Staff positions
- Sequoyah Nuclear Plant Draft Requests for Additional Information (RAIs)

Licensing Basis

- BFN Emergency Plan, Revision 0, was approved by the NRC by Safety Evaluation Report dated November 1, 1988
- TVA's Radiological Emergency Plan (REP) has two components for each site
 - NP-REP (Generic) which contains fleet-wide information [Current Revision 107]
 - BFN Site Specific REP Appendix A [Current Revision 108]

Proposed Changes

- Eliminate 30-minute augmented response positions
- Extend the requirement for dispatch of sampling teams from 30 and 60 minutes to 60 and 90 minutes
- Extend augmentation response times for onsite ERO personnel to 90 minutes
- Reduce the number of Radiation Protection (RP) immediate response positions from 12 to 6
- Transition on-shift dose assessment function from RP to Chemistry
- Remove maintenance personnel from on-shift
- Eliminate the 60-minute augmented response by the Radwaste Operator (RWO)
- Remove other 'as needed' support positions from REP Appendix A Emergency Plan Figures

Precedent

Safety Evaluations issued for the following:

- Susquehanna (ML030830543)
- Fermi (ML112450464)
- River Bend (ML012710218)
- Watts Bar (ML041810056)
- Point Beach (ML16118A154)
- Duane Arnold (ML17220A026)

Requests for Additional Information (RAIs) associated with the Sequoyah Nuclear Plant submittal dated September 29, 2017. (ML17272A940)

Applicable Regulatory Requirements

- 10 CFR 50.47(b)
- 10 CFR 50.54(q)
- 10 CFR 50, Appendix E
- 10 CFR 50.90

Applicable Guidance Documents

- RG 1.219, “Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,” Revision 1
- NSIR/DPR-ISG-01, “Emergency Planning for Nuclear Power Plants”
- NEI 10-05, “Assessment of On-Shift Emergency Response Organization Staffing and Capabilities”
- NUREG-0654/FEMA-REP-1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” Revision 1
- RIS 2016-10, “License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation”

Schedule

- Submit in March 2018
- Request approval within one year of submittal acceptance
- Propose a 180 day implementation period

Conclusion

Based on the technical, functional, and staffing analyses performed, TVA has concluded that the proposed changes:

- Maintain support for the required Emergency Plan functions
- Continue to ensure the protection of public health and safety
- Comply with applicable regulatory requirements

Questions?

