



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

January 10, 2019

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: **Browns Ferry Nuclear Plant - Site Emergency Plan Implementing Procedure Revision**

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q); 10 CFR 50, Appendix E; and 10 CFR 72.44(f), the Tennessee Valley Authority (TVA) is submitting a description of changes to the Browns Ferry Nuclear Plant (BFN) Radiological Emergency Plan. The affected document is the BFN Emergency Plan Implementing Procedure (EPIP) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-8	0030	Personnel Accountability and Evacuation	12/11/2018

#### Description of Changes and Summary of Analysis

EPIP-8, Revision 30, was revised to incorporate changes to update the QA and Non QA Records lists in section 4.0. This activity was evaluated using EPDP-17, Attachment 2 to determine whether a 10 CFR 50.54(q) Reduction in Effectiveness Evaluation was required. The activity was determined to be a change to the radiological emergency plan that was not editorial or typographical. The change did not conform to an activity that has prior approval. This activity was determined to not involve a site specific EP commitment and could therefore, be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

EPIP-8, Revision 30 was also revised to add spacing for identification of the SM/SED that directed the initiation of the procedure, as well as the time that the direction was given to Appendices E and G. Included in this change is the replacement of "Phone Number" with "Time" in the SM/SED identification lines in step 1.0[1] of Appendices C, D, and F. The addition of an identification line

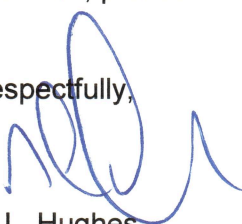
does not alter the roles and responsibilities of any member of the emergency response organization. It provides a location to document who made the call to initiate Assembly and Accountability/Evacuation. Replacing "Phone Number" with "Time" ensures the most appropriate, useful information is included in the step. The activity was a change to the radiological emergency plan that was not editorial or typographical. The change did not conform to an activity that has prior approval. This activity was determined to not involve a site specific EP commitment and could therefore, be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

EPIP-8, Revision 30 also proposed rewriting all instruction to perform public address announcements. EPIP-8 requires the CAS/SAS to make public address announcements during the site's response to an emergency; therefore, this addition does not alter the duties and responsibilities of the CAS/SAS operator but adds a visual prompt to ensure that the CAS/SAS operator performs this action. This activity was determined to be a change to the radiological emergency plan that was not editorial or typographical. The change did not conform to an activity that was previously approved. This activity did not involve a site specific EP commitment and could therefore, be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

Lastly, EPIP-8, Revision 30 proposed editorial/typographical changes throughout the document. This revision included combining steps to improve efficiency by capturing multiple actions as sub-steps under one main action step, where possible; correcting acronym usage, where necessary; removing unnecessary spaces around slashes and dashes; and correcting punctuation throughout the document. The activity was a change to the radiological emergency plan; however, the change was determined to be editorial or typographical in nature. Therefore, this activity could be implemented without performing a 50.54(q) reduction in effectiveness evaluation

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

Respectfully,



D. L. Hughes  
Site Vice President

cc:

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant  
NRR Project Manager - Browns Ferry Nuclear Plant  
NRC Director - Division of Spent Fuel Management, NMSS