



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

CNL-19-034

March 8, 2019

10 CFR 50.90
10 CFR 50.4
10 CFR 50.48(c)(3)

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

Subject: **Supplement 2 to TVA Request for Revision of Modifications 85, 102, and 106 Related to NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants for the Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Tables S-2 and B-1 (EPID: L-2018-LLA-0285)**

- References:
1. TVA Letter to NRC, CNL-18-100, "TVA Request for Revision of Modifications 85, 102, and 106 Related to NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants for the Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Tables S-2 and B-1," dated October 18, 2018 (ML18295A109)
 2. TVA Letter to NRC, CNL-19-027, "Supplement to TVA Request for Revision of Modifications 85, 102, and 106 Related to NFPA 805 Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants for the Browns Ferry Nuclear Plant, Units 1, 2, and 3 - Tables S-2 and B-1," dated February 13, 2019 (ML19044A708)
 3. NRC Letter to TVA, "Browns Ferry Nuclear Plant, Units 1, 2, and 3 - issuance of Amendments Regarding Transition to a Risk-Informed, Performance-Based Fire Protection Program in Accordance with 10 CFR 50.48(c)," dated October 28, 2015 (ML15212A796)
 4. NRC Letter to TVA, "Browns Ferry Nuclear Plant, Units 1, 2, AND 3 - Issuance of Amendment Nos. 305, 328, and 288 to Revise Technical Specification 5.5.12, "Primary Containment Leakage Rate Testing Program," dated September 27, 2018 (ML18251A003)

This letter requests that certain references in the license conditions for the three Browns Ferry Nuclear Plant (BFN) units be corrected. In Reference 1, Tennessee Valley Authority (TVA) requested a license amendment to modify the licensing basis regarding the National Fire

Protection Association (NFPA) 805 program, Table S-2 "Plant Modifications Committed." Reference 2 supplemented Reference 1 to provide clarification of Table S-2, Modification 102. During the Nuclear Regulatory Commission's (NRC) review of the reference application and its supplement, it was noted that references that are in license conditions for the three BFN units that refer to the title of Table S-2 were found to be in error. The license conditions refer to Table S-2 as "Plant Modifications" instead of "Plant Modifications Committed." TVA requests that the above references be corrected.

The references to Table S-2 were added by Reference 3, which approved transition of BFN Units 1, 2, and 3 to a fire protection program based on NFPA-805, and by Reference 4, which approved changes to BFN's containment leakage rate testing program. In adding the reference to Table S-2, the latter approval required that the Table S-2 modifications modeled in the fire PRA be completed before TVA utilized the approval in Reference 4. The proposed changes requested in References 1 and 2 are related to modifications that are not modeled in the fire PRA and, therefore, do not impact the containment leakage rate testing program changes approved in Reference 4.

Attachment 1 provides a revised markup of the affected pages of the BFN Units 1, 2, and 3 Renewed Facility Operating Licenses (RFOs). The RFOs are revised to include a reference to this letter.

The above request is editorial in nature and TVA has determined that the basis for the no significant hazards consideration associated with the proposed changes in References 1 and 2 is unaffected.

In accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter, to the Alabama State Department of Public Health.

TVA requests NRC approval of this change by March 28, 2019.

There are no new regulatory commitments contained in this submittal.

Please address any questions regarding this submittal to Michael A. Brown at (423) 751-3275.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 8th day of March 2019.

Respectfully,



E. K. Henderson
Director, Nuclear Regulatory Affairs

Enclosures

cc: See Page 3

U.S. Nuclear Regulatory Commission
CNL-19-034
Page 3
March 8, 2019

Enclosure

Attachment 1 - Markups of BFN Units 1, 2, and 3 Renewed Facility Operating
Licenses

cc (Enclosure):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant
NRC Project Manager - Browns Ferry Nuclear Plant
State Health Officer, Alabama State Department of Health

Attachment 1
Tennessee Valley Authority
Browns Ferry Nuclear Plant, Units 1, 2, and 3
Markups of BFN Units 1, 2, and 3 Renewed Facility Operating Licenses

- (8) Deleted.
- (9) Deleted.
- (10) Deleted.
- (11)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.
- (b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee CSP was approved by License Amendment No. 279, as amended by changes approved by License Amendment Nos. 286 and 297.
- (12) Deleted.
- (13) TVA Browns Ferry Nuclear Plant shall fully implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment request dated March 27, 2013, June 7, 2017, May 3, 2018, and October 18, 2018 as supplemented by letters dated May 16, 2013; December 20, 2013; January 10, 2014; January 14, 2014; February 13, 2014; March 14, 2014; May 30, 2014; June 13, 2014; July 10, 2014; August 29, 2014; September 16, 2014; October 6, 2014; December 17, 2014; March 26, 2015; April 9, 2015; June 19, 2015; August 18, 2015; September 8, 2015; October 20, 2015; September 18, 2017; ~~and~~ October 23, 2017, as approved in the Safety Evaluation dated October 28, 2015; December 19, 2017; October 9, 2018; and [[INSERT DATE SE]]. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as-operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC Safety Evaluation dated October 28, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), the licensee shall implement informed changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact, as described in (2) above. ; as supplemented by CNL-19-027, dated February 13, 2019 Committed
2. With the exception of Modifications 102 and 106, the licensee shall implement modifications to its facility, as described in Table S-2, "Plant Modifications," of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018, to complete the transition to full compliance with 10 CFR 50.48(c) no later than the end of the second refueling outage (for each unit) following issuance of the NFPA 805 License Amendment dated October 28, 2015. Modifications 102 and 106 as described in Table S-2, shall be implemented no later than August 14, 2019, and October 14, 2019, respectively. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall complete implementation items 09, 32, 33, and the second part of Implementation Item 47 as listed in Table S-3, "Implementation Items," of TVA letter CNL-17-130 dated October 23, 2017. Implementation Item 09 shall be completed by June 29, 2018. Implementation Items 32, 33, and the second part of Implementation Item 47, i.e., resolving Finding level Facts and Observations, are associated with modifications and will be completed after all procedure updates, modifications, and training are complete.
- (14) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).
- (15) The licensee is required to confirm that the conclusions made in TVA's letter dated September 17, 2004, for the turbine building remain acceptable using seismic demand accelerations based on dynamic seismic analysis prior to the restart of Unit 1.
- (16) Upon implementation of Amendment No. 275, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measure of CRE pressure as required by TS 5.5.13.d, shall be considered met.

- (h) The results of the visual inspections of the steam dryer shall be submitted to the NRC staff in a report in accordance with 10 CFR 50.4. The report shall be submitted to the NRC within 90 days following startup from each of the first two respective refueling outages.
- (i) Within 6 months following completion of the second refueling outage, after the implementation of the EPU, the licensee shall submit a long-term steam dryer inspection plan based on industry operating experience along with the baseline inspection results.

The license condition described above shall expire: (1) upon satisfaction of the requirements in items (g) and (h), provided that a visual inspection of the steam dryer does not reveal any new unacceptable flaw(s) or unacceptable flaw growth that is due to fatigue, and; (2) upon satisfaction of the requirements specified in item (i).

(19) Neutron Absorber Monitoring Program

The licensee shall, at least once every ten years, withdraw a neutron absorber coupon from the spent fuel pool and perform Boron-10 (B-10) areal density measurement on the coupon. Based on the results of the B-10 areal density measurement, the licensee shall perform any technical evaluations that may be necessary and take appropriate actions using relevant regulatory and licensing processes.

(20) Radiological Consequences Analyses Using Alternative Source Terms

TVA shall perform facility and licensing basis modifications to resolve the non-conforming/degraded condition associated with the Alternate Leakage Treatment pathway such that the current licensing basis (approved in License Amendment Nos. 251/282 (Unit 1) and 249/267 (Unit 3)) would remain valid. These facility modifications shall be complete prior to initial power asc 3458 MWt.

as supplemented
by CNL-19-027,
dated February 13,
2019

- (21) Prior to extending the frequency for the Integral Leakage Rate Test TS 5.5.12, the licensee shall implement the modifications, that are modeled in the Fire PRA and described in Table S-2, Plant Modifications, of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018.

Committed

- D. The UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21(d), shall be included in the next scheduled update to the UFSAR required by 10 CFR 50.71(e)(4) following the issuance of this renewed operating license. Until that update is complete, TVA may make changes to the programs and activities described in the supplement without prior Commission approval, provided that TVA evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.
- E. The UFSAR supplement, as revised, describes certain future activities to be completed prior to the period of extended operation. TVA shall complete these activities no later than December 20, 2013, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

- (8) Deleted.
- (9) Deleted.
- (10) Deleted.
- (11)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," submitted by letter dated April 28, 2006.
- (b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee CSP was approved by License Amendment No. 306, as amended by changes approved by License Amendment Nos. 312 and 321.
- (12) Deleted.
- (13) Deleted.
- (14) TVA Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment request dated March 27, 2013; June 7, 2017; May 3, 2018; and October 18, 2018, as supplemented by letters dated May 16, 2013; December 20, 2013; January 10, 2014; January 14, 2014; February 13, 2014; March 14, 2014; May 30, 2014; June 13, 2014; July 10, 2014; August 29, 2014; September 16, 2014; October 6, 2014; December 17, 2014; March 26, 2015; April 9, 2015; June 19, 2015; August 18, 2015; September 8, 2015; October 20, 2015; September 18, 2017; ~~and~~ October 23, 2017, as approved in the Safety Evaluations dated October 28, 2015; December 19, 2017; October 9, 2018; and [[INSERT DATE SE]]. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

; and February 13,
2019; and March 8,
2019

Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be

- Automatic and Manual Water-Based Fire Suppression Systems (Section 3.9);
- Gaseous Fire Suppression Systems (Section 3.10); and Passive Fire Protection Features (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

1. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC Safety Evaluation dated October 28, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

Transition License Conditions

1. Before achieving full compliance with 10 CFR 50.48(c), as specified risk-informed changes to the licensee's fire protection program may be implemented without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in (2) above.
2. With the exception of Modifications 102 and 106, the licensee shall implement modifications to its facility, as described in Table S-2, "Plant Modifications," of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018, to complete the transition to full compliance with 10 CFR 50.48(c) no later than the end of the second refueling outage (for each unit) following issuance of the NFPA 805 License Amendment dated October 28, 2015. Modifications 102 and 106 as described in Table S-2, shall be implemented no later than August 14, 2019, and October 14, 2019, respectively. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
3. The licensee shall complete Implementation Items 09, 32, 33, and the second part of Implementation Items 47 as listed in Table S-3, "Implementation Items," of TVA letter CNL-17-130 dated October 23, 2017. Implementation Item 09 shall be completed by June 29, 2018. Implementation Items 32, 33, and the second part of Implementation Item 47, i.e., resolving Finding level Facts and Observations, are associated with modifications and will be completed after all procedure updates, modifications, and training are complete.

; as supplemented
by CNL-19-027,
dated February 13,
2019

Committed

- (15) The licensee shall maintain the Augmented Quality Program for the Standby Liquid Control System to provide quality control elements to ensure component reliability for the required alternative source term function defined in the Updated Final Safety Analyses Report (UFSAR).
- (16) Upon implementation of Amendment No. 275, adopting TSTF-448, Revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.3.4, in accordance with TS 5.5.13.c(i), the assessment of the CRE habitability as required by TS 5.5.13.c(ii), and the measure of CRE pressure as required by TS 5.5.13.d, shall be considered met.

- (h) The results of the visual inspections of the steam dryer shall be submitted to the NRC staff in a report in accordance with 10 CFR 50.4. The report shall be submitted to the NRC within 90 days following startup from each of the first two respective refueling outages.
- (i) Within 6 months following completion of the second refueling outage, after the implementation of the EPU, the licensee shall submit a long-term steam dryer inspection plan based on industry operating experience along with the baseline inspection results.

The license condition described above shall expire: (1) upon satisfaction of the requirements in items (g) and (h), provided that a visual inspection of the steam dryer does not reveal any new unacceptable flaw(s) or unacceptable flaw growth that is due to fatigue, and; (2) upon satisfaction of the requirements specified in Item (i).

(19) Neutron Absorber Monitoring Program

The licensee shall, at least once every ten years, withdraw a neutron absorber coupon from the spent fuel pool and perform Boron-10 (B-10) areal density measurement on the coupon. Based on the results of the B-10 areal density measurement, the licensee shall perform any technical evaluations that may be necessary and take appropriate actions using relevant regulatory and licensing processes.

(20) Radiological Consequences Analyses Using Alternative Source Terms

TVA shall perform facility and licensing basis modifications to resolve the non-conforming/degraded condition associated with the Alternate Leakage Treatment pathway such that the current licensing basis dose calculations (approved in License Amendment Nos. 251/282 (Unit 1), 290/308 (Unit 2) and 249/267 (Unit 3)) would remain valid. These facility and licensing basis modifications shall be complete prior to initial power ascension above 3458 MWt.

- (21) Prior to extending the frequency for the Integral Leakage Rate Testing described in TS 5.5.12, the licensee shall implement the modifications, that are modeled in the Fire PRA and described in Table S-2, "Plant Modifications," of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018.

Committed

- D. The UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21, shall be included in the next scheduled update to the UFSAR required by 10 CFR 50.71(e)(4) following the issuance of this renewed operating license. Until that update is complete, TVA may make changes to the program activities described in the supplement without prior Commission approval, provided that TVA evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.
- E. The UFSAR supplement, as revised, describes certain future activities to be completed prior to the period of extended operation. TVA shall complete these activities no later than June 28, 2014, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.

; as supplemented by CNL-19-027, dated February 13, 2019

- (3) The licensee is authorized to relocate certain requirements included in Appendix A and the former Appendix B to licensee-controlled documents. Implementation of this amendment shall include the relocation of these requirements to the appropriate documents, as described in the licensee's application dated September 6, 1996; as supplemented May 1, August 14, November 5 and 14, December 3, 4, 11, 22, 23, 29, and 30, 1997; January 23, March 12, April 16, 20, and 28, May 7, 14, 19, and 27, and June 2, 5, 10 and 19, 1998; evaluated in the NRC staff's Safety Evaluation enclosed with this amendment. This amendment is effective immediately and shall be implemented within 90 days of the date of this amendment.
- (4) Deleted.
- (5) Classroom and simulator training on all power uprate related changes that affect operator performance will be conducted prior to operating at uprated conditions. Simulator changes that are consistent with power uprate conditions will be made and simulator fidelity will be validated in accordance with ANSI/ANS 3.5-1985. Training and the plant simulator will be modified, as necessary, to incorporate changes identified during startup testing. This amendment is effective immediately.
- (6)(a) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Browns Ferry Nuclear Plant Physical Security Plan, Training and Qualification Plan, and Contingency Plan," Revision 4, submitted by letter dated April 28, 2006.
- (b) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee CSP was approved by License Amendment No. 265, as amended by changes approved by License Amendment Nos. 271 and 281.
- (7) TVA Browns Ferry Nuclear Plant shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(c), as specified in the license amendment requests dated May 16, 2013; December 20, 2013; January 10, 2014; January 13, 2014; February 13, 2014; March 14, 2014; May 30, 2014; June 13, 2014; July 10, 2014; August 29, 2014; September 16, 2014; October 6, 2014; December 17, 2014; March 26, 2015; April 9, 2015; June 19, 2015; August 18, 2015; September 8, 2015; October 20, 2015; September 18, 2017; and October 23, 2017, as approved in the Safety Evaluations dated October 28, 2015; December 19, 2017; October 9, 2018; and [[INSERT DATE SE]]. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3 elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- Fire Alarm and Detection Systems (Section 3.8);
- Automatic and Manual Water-Based Fire Suppression Systems (Section 3.9);
- Gaseous Fire Suppression Systems (Section 3.10); and
- Passive Fire Protection Features (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC Safety Evaluation dated October 28, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety margins are maintained when changes are made to the fire protection program.

Transition License Conditions

1. Before achieving full compliance below, risk-informed changes to be made without prior NRC review demonstrated to have no more than minimal risk impact, as specified by (2) section program may not be made without prior NRC review demonstrated to have no more than minimal risk impact, as described in (2) above. **as supplemented by CNL-19-027, dated February 13, 2019**
2. With the exception of Modifications 102 and 106, the licensee shall implement modifications to its facility, as described in Table S-2, "Plant Modifications," of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018, to complete the transition to full compliance with 10 CFR 50.48(c) no later than the end of the second refueling outage (for each unit) following issuance of the NFPA 805 License Amendment dated October 28, 2015. Modifications 102 and 106 as described in Table S-2, shall be implemented no later than August 14, 2019, and October 14, 2019, respectively. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.

Committed

(16) Radiological Consequences Analyses Using Alternative Source Terms

TVA shall perform facility and licensing basis modifications to resolve the non-conforming/degraded condition associated with the Alternate Leakage Treatment pathway such that the current licensing basis dose calculations (approved in License Amendment Nos. 251/282 (Unit 1), 290/308 (Unit 2) and 249/267 (Unit 3)) would remain valid. These facility and licensing modifications shall be complete prior to initial power ascension at 3458 MWt.

as supplemented
by CNL-19-027,
dated February 13,
2019

- (17) Prior to extending the frequency for the Integral Leakage Rate Testing described in TS 5.5.12, the licensee shall implement the modifications that are modeled in the Fire PRA and described in Table S-2, "Plant Modifications," of Tennessee Valley Authority letter CNL-18-100, dated October 18, 2018.

Committed

- D. The UFSAR supplement, as revised, submitted pursuant to 10 CFR 54.21(d), shall be included in the next scheduled update to the UFSAR required by 10 CFR 50.71(e)(4) following the issuance of this renewed operating license. Until that update is complete, TVA may make changes to the programs and activities described in the supplement without prior Commission approval, provided that TVA evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.
- E. The UFSAR supplement, as revised, describes certain future activities to be completed prior to the period of extended operation. TVA shall complete these activities no later than July 2, 2016, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection.