



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

August 7, 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-14	0022	Radiological Control Procedures	07/08/2019

Description of Changes and Summary of Analysis

EPIP-14, Revision 22, was revised to implement a number of editorial/typographical changes to correct/address acronym use, punctuation, formatting, and references. Two of the changes are proposed to clarify the expected action of the content. This activity was determined to be an editorial or typographical change to the radiological emergency plan; therefore, the activity could be performed without performing a 50.54(q) reduction in effectiveness evaluation.

This revision also proposed changes to Subsections 3.2, Alert, and 3.3, Site Area Emergency or General Emergency. Contamination control considerations were added to both sections 3.2 and 3.3 to provide an additional level of assurance that the contamination control measures being evaluated are considered during the response to a release of radioactivity during a radiological emergency. Wording was added to Steps 3.2.B and 3.3.B that instructs the performer to consider establishing additional contamination controls such as step off pads and entry control measures to

prevent contaminating clean areas. Wording was also added to Steps 3.2.C and 3.3.C that instructs the performer to consider plume location during the OSC team dispatch process. These changes were screened collectively because their justification is the same. They both involve the addition of contamination control considerations. This activity was evaluated using EPDP-17, Attachment 2, and 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 had prior approval. The activity was determined to impact the 10 CFR 50.47(b)(1), Assignment of Responsibility (Organization Control) Standard and the 10 CFR 50.47(b)(11), Radiological Exposure Control Standard; therefore, the activity could not be implemented without performing a 50.54(q) reduction in effectiveness evaluation. Upon completion of the EPDP-17, Attachment 4, it was determined that the change did not constitute a reduction in effectiveness. The activity continues to comply with the requirements of 50.47(b) and 50 Appendix E and the activity does not constitute a reduction in effectiveness. Therefore, the activity was implemented without prior approval.

This revision also proposed changes to section 4.0, RECORDS, of EPIP-14. The revision involved the removal and addition of several records in the Non-QA Records section. This activity was evaluated using EPDP-17, Attachment 2, and 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 had prior approval. The activity did not impact any Planning Standard, and, the activity did not involve a site specific EP commitment. Therefore, it was determined that the 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