



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

November 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-2	0039	Notification of Unusual Event	10/08/2019
EPIP-3	0042	Alert	10/08/2019
EPIP-4	0041	Site Area Emergency	10/08/2019
EPIP-5	0055	General Emergency	10/08/2019

Description of Changes and Summary of Analysis

EPIP-2, Revision 39; EPIP-3, Revision 42; EPIP-4, Revision 41; and EPIP-5, Revision 55, were revised to implement changes related to notifying the State of Alabama of a declared emergency. The wording in the third paragraph of subsection 1.1 in EPIP-2 was changed from "15 minutes from classification declaration" to "within 15 minutes of classification declaration." Also in EIPs-2 through 5 all instances of "not to exceed 15 minutes" was replaced with "within 15 minutes." These changes align the verbiage in EIPs-2 through 5 related to the time requirement for notification of the state and local government agencies with the verbiage detailed in 10 CFR 50, Appendix E, section IV, paragraph 7.D.3. These changes were screened collectively because the justification

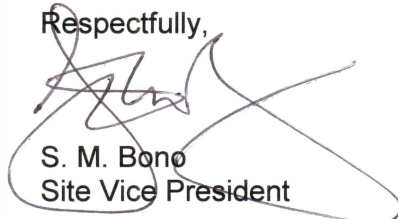
for making them was the same. This activity was determined to be a change to the radiological emergency plan and was not editorial or typographical. However, this change conforms to an activity that has a prior approval. 10 CFR 50, Appendix E, section IV.D.3 states, in part, "A licensee shall have the capability to notify responsible state and local government agencies within 15 minutes after declaring an emergency." These changes ensure that the verbiage in the procedures mirror the verbiage found in the regulation. Therefore, it was determined that this activity could be implemented without performing a 50.54(q) reduction in effectiveness evaluation.

Several changes of an editorial/typographical nature were also made to EPIP-2, Revision 39; EPIP-3, Revision 42; EPIP-4, Revision 41; and EPIP-5, Revision 55. These changes were screened collectively because they were all editorial/typographical in nature; therefore, the justification was the same. The activity was determined to be a change to the radiological emergency plan; however, as stated above, the changes are editorial or typographical. Therefore, this activity was implemented without performing a 50.54(q) reduction in effectiveness evaluation.

Lastly EPIP-2, Revision 39 proposed a change to the NOTE box in Appendix G. This change was proposed because the wording in the NOTE box was contradictory to the instructions given in EPIP-16 section 4.0, related to the retention requirements of records created during the implementation of the procedure. The activity was determined to be a change to the radiological emergency plan that was not editorial or typographical in nature. The change did not conform to an activity that had prior approval; however, it was also determined that none of the Planning Standards were impacted by the change. The activity did not involve a site specific EP commitment; therefore, it was determined that 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,



S. M. Bono
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