



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

November 8, 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-12	0022	Emergency Equipment and Supplies	09/23/2019

Description of Changes and Summary of Analysis

This revision of EPIP-12 (Revision 22) was made effective as of September 23, 2019. Contrary to 10 CFR 50, Appendix E, Section VI.3.a, this submittal is being made greater than 30 days from the effective date. This has been entered into the licensee's corrective action program (CR 1560877).

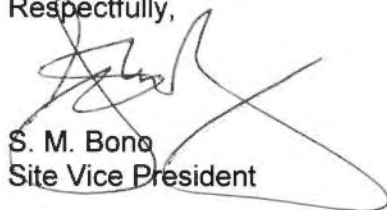
EPIP-12, Revision 22, was revised to implement a number of changes that were screened as editorial/typographical in nature. These changes were screened collectively because they were all editorial/typographical in nature; therefore, the justification is the same. This activity was determined to be a change to the radiological emergency plan; however, as stated above, the changes were determined to be editorial/typographical in nature. Therefore, the activity was allowed to be performed without performing a 50.54(q) reduction in effectiveness evaluation.

EPIP-12, Revision 22, was revised to remove a statement from the procedure in regards to the disposal and storage of flashlight batteries. It was originally stated that the batteries should not be discarded but should instead be returned to the tool room. This statement was removed because the practice detailed by the instruction is no longer in place at BFN. This activity was determined to be a change to the radiological emergency plan that was not editorial or typographical in nature. The change also did not conform to an activity that had prior approval. No Planning Standard was impacted by this change and the activity did not involve a site specific Emergency Preparedness commitment. It was concluded that the change could be implemented without performing a 50.54(q) reduction in effectiveness evaluation because it does not impact any of the Planning Standards.

Lastly, a change to Central Emergency Control Center (CECC) EPIP-12 and BFN EPIP-12 was implemented, which relocated the requirement for checking the Radiological Monitoring Control Center Field Coordinator Laptop and radio connectivity. The information was previously contained in CECC EPIP-12, Attachment 7 and was relocated to BFN EPIP-12, Attachment 4. This activity was determined to be a change to the radiological emergency plan that was not editorial or typographical in nature. This change was also determined to not conform to an activity that has prior approval. Planning Standard 10 CFR 50.47(b)(8) – Emergency Facility and Equipment was determined to be impacted by this change; therefore, it was concluded that this activity could not be implemented without performing a 50.54(q) reduction in effectiveness evaluation. Upon completion of the Effectiveness Evaluation Form it was concluded that 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 allowed to be implemented without prior approval.

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