



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION II
245 PEACHTREE CENTER AVENUE N.E., SUITE 1200
ATLANTA, GEORGIA 30303-1200

January 18, 2022

Mr. James Barstow
Vice President, Nuclear Regulatory Affairs and Support Services
Tennessee Valley Authority
1101 Market Street
LP 4A-C
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT – SECURITY BASELINE INSPECTION
REPORT 05000259/2021402 AND 05000260/2021402 AND 05000296/2021402

Dear Mr. Barstow:

On December 10, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Browns Ferry Nuclear Plant. On December 9, 2021, the NRC inspectors discussed the results of this inspection with Joe Quinn and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

A handwritten signature in black ink, appearing to be "JB" or similar initials.

Signed by Baptist, James
on 01/18/22

James B. Baptist, Chief
Engineering Br 1
Division of Reactor Safety

Docket Nos. 05000259 and 05000260 and 05000296
License Nos. DPR-33 and DPR-52 and DPR-68

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

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DATED January 18, 2022

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OFFICE	RII/DRS/EB2	RII/DRS/EB1			
NAME	J. Montgomery	J. Baptist			
DATE	1/18/2022	1/18/2022			

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers: 05000259, 05000260 and 05000296

License Numbers: DPR-33, DPR-52 and DPR-68

Report Numbers: 05000259/2021402, 05000260/2021402 and 05000296/2021402

Enterprise Identifier: I-2021-402-0054

Licensee: Tennessee Valley Authority

Facility: Browns Ferry Nuclear Plant

Location: Athens, Alabama

Inspection Dates: December 06, 2021 to December 10, 2021

Inspectors: J. Montgomery, Senior Reactor Inspector

Approved By: James B. Baptist, Chief
Engineering Br 1
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Browns Ferry Nuclear Plant, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

SAFEGUARDS

71130.14 - Review of Power Reactor Target Sets

The inspectors evaluated the Security Target Set Program. The following elements were evaluated:

Review of Power Reactor Target Sets (1 Sample)

- (1) Section 02.01 Review of Events and Logs
This section was not reviewed.

Section 02.02 Target Set Identification and Development Process Review

The inspector assessed the licensee's documentation and maintenance of the process used to develop and identify complete and accurate target sets as required by 10 CFR Part 73 by reviewing applicable portions of procedures and samples of records and conducting interviews with responsible personnel and plant employees.

Section 02.03 Verification of Target Sets Changes

The inspector reviewed changes to the licensee's documented target sets since the last Target Set inspection. The inspector verified that any design modifications and procedure or configuration changes that have occurred were appropriately documented in the site's target sets.

Section 02.04 Verification of Complete and Accurate Target Sets

The inspector interviewed licensee personnel and reviewed a sample of target sets for reactor operation and for modes other than operation. The inspector reviewed assumptions used in the licensee's development of its target sets.

Section 02.05 Physical Protection Program Review

The inspector verified that the licensee performed a review of target sets for accuracy, completeness, and applicability at least every 24 months and as otherwise required, documented the results and recommendations, and entered findings in the site's corrective action program (CAP)

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On December 9, 2021, the inspectors presented the security baseline inspection results to Joe Quinn and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.14	Corrective Action Documents	CR 1474520	During NRC review of Target Sets NRC identified that there was a Target Set Identified which required additional validation	12/11/2018
		CR 1474520	During NRC review of Target Sets NRC identified that there was a Target Set Identified which required additional validation	12/11/2018
		CR 1474523	During NRC review of Target Sets NRC identified additional measures which require evaluation	12/11/2018
		CR 1486322	The NRC identified a Green NCV of 10 CFR 73.55(f)(1)...	1/29/2019
		CR 1527278	During the FOF inspection Planning Week, it was noted that a Target Set was not titled correctly	6/24/2019
		CR 1531068	Issue identified by NRC concurring BFN Target Sets. A previously-revised target set requires non-credited operator actions.	7/9/2019
		CR 1721467	Revision of Targets Sets is needed to add components based on Annual review	9/15/2021
		CR 1735235	During an Corporate review of the Security Target Sets in preparation for the NRC Baseline Inspection December 6-8, 2021, recommendation to use the NEI-13-05 template for the target sets.	11/10/2021
		CR 1735239	Review the justification as to why a CDA was determined to be included or omitted from the target sets documented on Attachment 4, "Cyber Target Set Component Analysis." CDAs should be reviewed in accordance with the target set review policy	11/10/2021
	Corrective Action Documents Resulting from Inspection	CR 1740891	Evaluate verbiage in the Cyber Security Justification section, consider removal of reference to the CDA spreadsheet. Consider including a discussion on cyber security attack vectors	12/8/2021
	Procedures	NPG-SPP-14.2	Target Set Development, Identification and Maintenance	Rev. 9

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Self-Assessments		Pre NRC Baseline Self Assessment	9/30/2021