



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
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February 28, 2000

Tennessee Valley Authority
ATTN: Mr. J. A. Scalice
Chief Nuclear Officer and
Executive Vice President
6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: BROWNS FERRY NUCLEAR PLANT RESPONSE TO BIENNIAL EXERCISE
ISSUE FROM NRC INTEGRATED INSPECTION REPORT 50-259/99-03,
50-260/99-03, AND 50-296/99-03

Dear Mr. Scalice:

This refers to your letter dated January 18, 2000, regarding the exercise issue discussed in Section P4.2.b.4 of the subject NRC report.

Your letter expresses disagreement with our conclusion that the second protective action recommendation (PAR) provided to State authorities during the exercise on May 26, 1999, was incorrect, and that exercise objective D.4 was therefore not demonstrated. Exercise objective D.4 stated, "Demonstrate the ability of the CECC [Central Emergency Control Center] to provide emergency classification, protective action recommendations, plant conditions, and dose assessment information to the State in a timely manner." Based on further review of this matter, we agree with the statement in your letter that "CECC objective D.4 is multifaceted in nature, and, as such, a perceived PAR oversight should not represent a total failure to successfully perform the objective." We conclude that objective D.4 was adequately demonstrated from an overall perspective.

However, we are not dissuaded from our original conclusion that the second PAR was incorrect and not in accordance with CECC EPIP [Emergency Plan Implementing Procedure] -1, "CECC Alert, Site Area Emergency, and General Emergency," Revision 27, effective May 20, 1999. Nothing in your procedures or in NRC regulations or guidance absolves you from the responsibility to provide an appropriate and timely PAR, irrespective of actions that may have already been taken by offsite authorities. Because of the State's prior decision to evacuate the sector in question, public health and safety likely would not have been affected in this set of circumstances. Our concern is that an incorrect PAR was provided, and your critique should have identified this inaccuracy. This PAR error represents a failed opportunity in the Performance Indicator (PI) for Drill/Exercise Performance (DEP). The data you previously submitted for the DEP PI should be revised accordingly.

Should you have any further questions regarding this matter, please contact me.

Sincerely,

/RA/

Paul E. Fredrickson, Chief
Reactor Projects Branch 6
Division of Reactor Projects

Docket Nos.: 50-259, 50-260, 50-296
License Nos.: DPR-33, DPR-52, DPR-68

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