



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

December 18, 2009

10 CFR 50.90
10 CFR 50.4

TS-470

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Facility Operating License Nos. DPR-33, DPR-52 and DPR-68
NRC Docket Nos. 50-259, 50-260 and 50-296

Subject: Supplement to Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan

Reference: Letter from the Tennessee Valley Authority (TVA) to NRC, "Request for Approval of the Browns Ferry Nuclear Plant Cyber Security Plan," dated November 23, 2009

As required by 10 CFR 73.54, "Protection of digital computer and communication systems and networks," by the referenced letter, the Tennessee Valley Authority (TVA) submitted a request for an amendment to Facility Operating License Nos. DPR-33, DPR-52, and DPR-68 for Browns Ferry Nuclear Plant (BFN) Units 1, 2, and 3, respectively.

The purpose of this letter is to provide a supplemental determination of "no significant hazards consideration," as set forth in 10 CFR 50.92, "Issuance of Amendment." The enclosed supplement is intended to substitute for the Significant Hazards Consideration contained in Section 4.2 of Enclosure 1 of the referenced letter.

This supplement does not change the proposed change to the license, nor does it change the Browns Ferry Nuclear Plant Cyber Security Plan and Implementation Schedule enclosed in the referenced letter.

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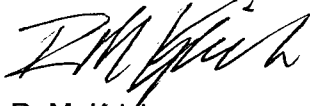
In accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter to the designated Alabama state official.

There are no regulatory commitments associated with this license amendment request.

If you should have any questions regarding this submittal, please contact Fred Mashburn at (423) 751-8817.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 23rd day of December, 2009.

Respectfully,



R. M. Krich
Vice President
Nuclear Licensing

Enclosure: Evaluation of Proposed Change

cc: (Enclosure):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Browns Ferry Nuclear Plant
State Health Officer – Alabama Department of Public Health

Enclosure

Evaluation of Proposed Change Consideration of No Significant Hazards Browns Ferry Nuclear Plant Cyber Security Plan

SIGNIFICANT HAZARDS CONSIDERATION

The proposed amendment adds a condition to the operating licenses to require the licensee to implement and maintain in effect all provisions of the Commission-approved Cyber Security Plan. The TVA has evaluated the proposed amendments using the criteria in 10 CFR 50.92, "Issuance of amendment," and has determined that the proposed amendment does not involve a significant hazards consideration. An analysis of the issue of no significant hazards consideration is presented below:

Criterion 1: The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Neither the proposed additional license condition nor the Cyber Security Plan directly impacts the physical configuration or function of plant structures, systems, or components (SSCs). Likewise, they do not change the manner in which SSCs are operated, maintained, modified, tested, or inspected. Neither the proposed additional license condition nor the Cyber Security Plan introduces any initiator of any accident previously evaluated. Any modifications to the physical configuration or function of SSCs or the manner in which SSCs are operated, maintained, modified, tested, or inspected that might result from the implementation of the Cyber Security Plan will be fully evaluated by existing regulatory processes (e.g., 10 CFR 50.59) prior to their implementation to ensure that they do not result in any increase in the probability or consequence of an accident previously evaluated.

Therefore, it is concluded that this proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Criterion 2: The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed amendment is intended to provide high assurance that safety-related SSCs are protected from cyber attacks. Inclusion of the additional condition in the Facility Operating License to implement the Cyber Security Plan does not directly alter the plant configuration, require new plant equipment to be installed, alter or create new accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any previously evaluated.

Criterion 3: The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed amendment does not involve any physical changes to plant or alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by this change. The proposed change will not result in plant operation in a configuration outside the design basis. The proposed change does not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition. Adding a license condition to require implementation of Cyber Security Plan will not reduce a margin of safety because the requirements of the Plan are designed to provide high assurance that safety-related SSCs are protected from cyber attacks.

Based on the above, the TVA concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of no significant hazards consideration is justified.