



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

EA-12-050

March 30, 2012

10 CFR 2.202

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: TENNESSEE VALLEY AUTHORITY (TVA) - ANSWER TO ORDER
EA-12-050 WITH REGARD TO RELIABLE HARDENED
CONTAINMENT VENTS FOR BROWNS FERRY NUCLEAR PLANT

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an immediately effective order in the captioned matter entitled Order Modifying License with Regard to Reliable Hardened Containment Vents (Effective Immediately) ("Order") to, *inter alia*, TVA. The Order states that, as a result of the NRC's evaluation of the lessons learned from the accident at Fukushima Dai-ichi in March 2011, the NRC has decided to direct nuclear power plant licensees and construction permit holders to take certain actions. Specifically with respect to this Order, the NRC requires BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of reliable hardened vent systems to remove decay heat and maintain control of containment pressure following events that result in loss of active containment heat removal capability or prolonged Station Blackout (SBO). SBO specific requirements are outlined in Attachment 2 to the Order. Licensees are to submit an overall integrated plan detailing their intended means of compliance by February 28, 2013. The hardened containment vent systems are required to be fully installed:

no later than two (2) refueling cycles following the submittal of the overall integrated plan, as required in Condition C.1. (scheduled to be issued in August 2012), or December 31, 2016, whichever comes first. (Order, Section IV.A)

The Order states that the Commission intends to decide, after receipt of a

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Policy Paper from the NRC Staff, whether to also require installation of filtration systems on these hardened vent systems (Order, Section II, p. 5). The Policy Paper is scheduled to be delivered by July 2012. The full extent of work necessary to implement this Order cannot be known until after Commission action following its review of the Staff's July 2012 Policy Paper.

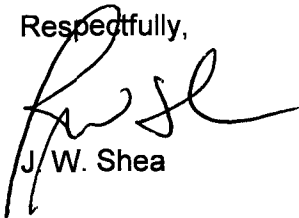
Pursuant to 10 C.F.R. § 2.202 and the terms specified in the Order, TVA hereby submits its Answer to the Order. TVA consents to the Order and does not request a hearing. Based on information currently available, TVA has not identified any circumstances of the type described in Sections IV.B.1 and IV.B.2 of the Order requiring relief at this time. In addition, TVA has not identified any impediments to compliance with the Order within two refueling cycles after submittal of the overall integrated plan, or December 31, 2016, whichever is earlier.

TVA will provide further responses as required by Section IV.C. in accordance with the specified deadlines. However, given the uncertainties associated with the ultimate scope of required work caused by the unavailability of implementing guidance until August 2012, the potential impact of the anticipated Staff's July 2012 Policy Paper, and the impact on the ability of TVA to comply with the specific compliance deadline dates based on the probable availability of that guidance, TVA's future responses may include requests for schedule relief as warranted by subsequent NRC requirements or implementing guidance or the results of engineering analyses not yet performed. Any such request would be submitted in accordance with the relaxation provision in Section IV of the Order.

If you have questions regarding our comments, please contact Fredrick Mashburn (423)751-8817.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 30th day of March 2012.

Respectfully,



J. W. Shea

cc:

NRR Director - NRC Headquarters
NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant