



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

EA-13-109

June 25, 2013

10 CFR 2.202

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
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 - ANSWER TO JUNE 6, 2013 ORDER
MODIFYING LICENSE WITH REGARD TO RELIABLE HARDENED
CONTAINMENT VENTS CAPABLE OF OPERATION UNDER SEVERE
ACCIDENT CONDITIONS (ORDER NUMBER EA-13-109)**

On June 6, 2013, the Nuclear Regulatory Commission (NRC) issued an immediately effective order to all licensees that operate boiling-water reactors (BWRs) with Mark I and II containment designs, including the Tennessee Valley Authority (TVA) Browns Ferry Nuclear Plant (BFN), entitled "Order Modifying License with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions (Effective Immediately) (EA-13-109)." Order EA-13-109 rescinds an order issued by the NRC on March 12, 2012 (EA-12-050), that required all BWRs with Mark I and Mark II containments to take certain actions to ensure the operability of a 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 loss of AC power.

Order EA-13-109 requires TVA to install hardened containment venting systems that can be maintained functional during severe accident conditions (i.e. following significant core damage). The substantive requirements for reliable hardened vent systems capable of operation under severe accident conditions are contained in Attachment 2 of the Order. The order includes two separate implementation phases (i.e., Phases 1 and 2). Phase 1 includes modifications to wetwell venting systems, while Phase 2 includes modifications to drywell venting systems or implementation of a reliable containment strategy that meets regulatory approval. TVA is required to submit an overall integrated plan describing how compliance with Phase 1 will be achieved to the NRC by June 30, 2014, and is required to complete full implementation of Phase 1 requirements no later than startup from the second

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refueling outage that begins after June 30, 2014, or June 30, 2018, whichever is sooner. Order EA-13-109 also requires TVA to submit an overall integrated plan describing how compliance with Phase 2 will be achieved to the NRC by December 31, 2015, and full implementation of Phase 2 requirements must be complete no later than startup from the first refueling outage that begins after June 30, 2017, or June 30, 2019, whichever is sooner.

The NRC states in the Order EA-13-109 that it anticipates issuing implementation guidance for Phase 1 by October 31, 2013, and for Phase 2 by April 30, 2015. Upon issuance of the implementation guidance, TVA understands that it will have twenty days to assess the impact of the guidance and notify the NRC of any challenges with implementation of the order in accordance with Section IV.C of the Order.

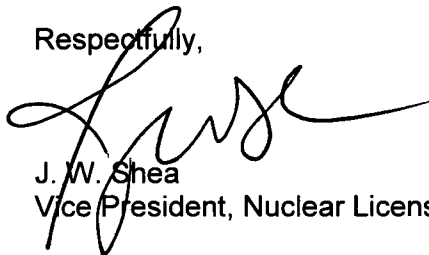
Pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Part 2.202(a)(2), this letter provides the TVA written answer to the Order. In addition, TVA consents to Order EA-13-109 and does not request a hearing. However, because implementing guidance is not expected to be available until October 31, 2013, for Phase 1 and April 30, 2015, for Phase 2, there remain significant uncertainties about the scope of the work that will be required by Order EA-13-109. As a result of those uncertainties, 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.

TVA understands that all implementation deadlines and submittal requirements for Order EA-12-050 are no longer in force because Order EA-12-050 is rescinded by Order EA-13-109. As such, TVA considers the integrated plan that was submitted to the NRC on February 28, 2013, to be withdrawn, and no further action is required by TVA with respect to that submittal or any other requirement specific to Order EA-12-050.

There are no new regulatory commitments made in this letter. If you have questions regarding this matter, please contact Kevin Casey at (423) 751-8523.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th day of June 2013.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

cc:

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