



Tennessee Valley Authority, Post Office Box 2000, Decatur, Alabama 35609-2000

September 10, 2018

10 CFR 50.4  
10 CFR 50.54(q)  
10 CFR 50, Appendix E  
10 CFR 72.44(f)

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

Browns Ferry Nuclear Plant, Units 1, 2, and 3  
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68  
NRC Docket Nos. 50-259, 50-260, 50-296, and 72-052

Subject: **Browns Ferry Nuclear Plant - Site Emergency Plan Implementing Procedure Revision**

In accordance with the requirements of Title 10 of the Code of Federal Regulations (10 CFR) 50.54(q); 10 CFR 50, Appendix E; and 10 CFR 72.44(f), the Tennessee Valley Authority (TVA) is submitting a description of changes to the Browns Ferry Nuclear Plant (BFN) Radiological Emergency Plan. The affected document is the BFN Emergency Plan Implementing Procedure (EPIP) named below.

<u>EPIP</u>	<u>Revision</u>	<u>Title</u>	<u>Effective Date</u>
EPIP-2	0038	Notification of Unusual Event	08/09/2018

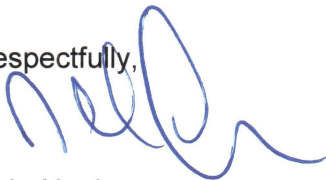
#### Description of Changes and Summary of Analysis

EPIP-2, Revision 38, was revised to incorporate changes related to the declaration of a Notification of an Unusual Event. The below changes were determined to be not editorial/typographical in nature. Revision 38 of EPIP-2 removed steps [4] and [5] from Appendix B of section 1.0. This revision also removed steps [2] and [3] from section 3.0. The information contained in steps 1.0[4] and 3.0[2] was determined to not be needed to meet the intent of this appendix. Additionally, the instruction is contained in the main body of the procedure at step 3.6[1]. The instruction in step 1.0[5] was inadvertently added in Revision 37. Step 3.0[3] does not contain any instruction. This was documented in CR 1434819.

These activities were all evaluated using EPDP-17, Attachment 2 (Screening Evaluation Form) to determine whether a 10 CFR 50.54(q) Reduction in Effectiveness Evaluation was required. The activity was determined to be a change to the radiological emergency plan that was not editorial or typographical. Upon completion of Attachment 2, it was determined that the activity could not be implemented without performing a 10 CFR 50.54(q) reduction in effectiveness evaluation; therefore, EPDP-17, Attachment 4 was completed. It was determined that none of the proposed changes were a reduction in effectiveness because they do not alter the process for timely augmentation of the onshift staff. Additionally, there are no changes to the staffing of the onsite emergency response centers as a result of this change. The timeliness of actions to take related to augmenting the onshift Emergency Response Organization (ERO) was not affected by removing this instruction because the actions are currently contained in the main body of the procedure at step 3.6[1]. The instruction in step 1.0[5] (DIRECT ODS to activate TEENS using "BFN NOUE") was never intended to activate the ERO. It was simply a notification to keep the ERO informed related to the status of the site from an emergency classification perspective. Therefore, removing it has no impact on the site's ability to augment the onshift ERO staff in a timely manner. The activity continues to comply with the requirements of 10 CFR 50.47(b) and 10 CFR 50 Appendix E and the activity does not constitute a reduction in effectiveness; therefore, it was determined that the activities could be implemented without prior approval.

There are no new regulatory commitments in this letter. If you have any questions regarding this submittal, please contact B. F. Tidwell at (256)729-3666.

Respectfully,



D. L. Hughes  
Vice President

cc:

NRC Regional Administrator - Region II  
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant  
NRR Project Manager - Browns Ferry Nuclear Plant  
NRC Director - Division of Spent Fuel Management, NMSS