

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

EA-12-049

October 29, 2012

10 CFR 2.202

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

> Bellefonte Nuclear Plant, Units 1 and 2 Construction Permit Nos. CPPR-122 and CPPR-123 NRC Docket Nos. 50-438 and 50-439

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

Sequoyah Nuclear Plant, Units 1 and 2 Facility Operating License Nos. DPR-77 and DPR-79 NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Unit 1 Facility Operating License No. NPF-90 NRC Docket No. 50-390

Watts Bar Nuclear Plant, Unit 2 Construction Permit No. CPPR-92 NRC Docket No. 50-391

Subject:

Tennessee Valley Authority - Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

- NRC Order Number EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
- 2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012



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References:

- 3. Nuclear Energy Institute (NEI) Letter to NRC, Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX), dated February 24, 2012
- 4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012

On March 12, 2012, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an order (Reference 1) to the Tennessee Valley Authority (TVA). Reference 1 was immediately effective and directs TVA to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 requires submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2. This report confirms TVA has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in Attachment 2 of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered for the Browns Ferry, Sequoyah, and Watts Bar Nuclear Plants prior to the issuance of Reference 2, as described in NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources are being identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for Browns Ferry Nuclear Plant, Units 1, 2, and 3, Sequoyah Nuclear Plant, Units 1 and 2, and Watts Bar Nuclear Plant, Units 1 and 2 for the next six months:

Development and submittal of the overall integrated plan.

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Planned activities for Bellefonte Nuclear Plant Units 1 and 2 for the next six months:

Development of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

None at this time.

Project milestones schedule through completion of installation and testing:

- A project milestones schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for each Site and Unit number prior to startup from the Refueling Outage (RFO) or prior to issuance of an operating license as indicated below:

0	Bellefonte Nuclear Plant, Unit 1	prior to issuance of an operating license
0	Bellefonte Nuclear Plant, Unit 2	prior to issuance of an operating license
0	Browns Ferry Nuclear Plant, Unit 1	prior to startup from RFO 11, Fall/2016
0	Browns Ferry Nuclear Plant, Unit 2	prior to startup from RFO 18, Spring/2015
0	Browns Ferry Nuclear Plant, Unit 3	prior to startup from RFO 17, Spring/2016
0	Sequoyah Nuclear Plant, Unit 1	prior to startup from RFO 20, Spring/2015
0	Sequoyah Nuclear Plant, Unit 2	prior to startup from RFO 20, Fall/2015
0	Watts Bar Nuclear Plant, Unit 1	prior to startup from RFO 13, Fall/2015
0	Watts Bar Nuclear Plant, Unit 2	prior to issuance of an operating license

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact Kevin Casey at (423) 751-8523.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of October 2012.

Respectfully,

/ice President, Nuclear Licensing

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CC:

NRR Director - NRC Headquarters
NRO Director - NRC Headquarters
NRC Regional Administrator - Region II
NRR Project Manager - Bellefonte Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant
NRR Project Manager - Sequoyah Nuclear Plant
NRR Project Manager - Watts Bar Nuclear Plant
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC

Mr. Eric Bowman, NRR/DPT/PGCB, NRC