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February 26, 2010

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

**BELL BEND NUCLEAR POWER PLANT
RESPONSE TO ENVIRONMENTAL
REQUESTS FOR ADDITIONAL
INFORMATION, NINTH SUBMITTAL
BNP-2010-056 Docket No. 52-039**

- References:
- 1) Letter from U.S. NRC Document Control Desk to R.R. Sgarro (PPL), "Requests for Additional Information Related to the Environmental Review for the Combined License Application for Bell Bend Nuclear Power Plant," dated July 10, 2009
 - 2) Letter from R.R. Sgarro (PPL) to U.S. NRC Document Control Desk, "Bell Bend Nuclear Power Plant Response to Environmental Requests for Additional Information, Eighth Submittal," dated January 15, 2010

The purpose of this letter is to respond to several Environmental Report (ER) requests for additional information (RAIs) identified in the NRC correspondence to PPL Bell Bend, LLC (Reference 1). These RAIs address environmental issues, as discussed in Part 3 of the Bell Bend Nuclear Power Plant Combined License Application (COLA).

Enclosure 1 provides the current ER RAI response status and the planned submittal dates for the remaining responses.

PPL plans to transmit a series of responses to the RAIs on or before the planned submittal dates provided in Enclosure 1. The planned submittal schedule reflects the impacts of PPL's recent decision to move the location of the BBNPP powerblock within the existing project boundary in order to substantially avoid wetlands impacts, and is subject to change as PPL continues to develop the information required for the responses. PPL will keep the NRC staff informed of schedule changes in a timely manner. Enclosure 2 provides responses to two RAIs, SE 4.4-9 and CB 10.4-1. Enclosure 2 also provides a supplemental RAI response to RAI CR 2.5-6. Reference 2 committed to supplying additional information pertaining to the response to RAI CR 2.5-6 upon availability.

D079
NRD

If you have any questions, please contact the undersigned at 570-802-8102.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 26, 2010

Respectfully,



Rocco R. Sgarro

RRS/kw

- Enclosures:
- 1) Response Status for Environmental Requests for Additional Information, Bell Bend Nuclear Power Plant, Luzerne County Pennsylvania
 - 2) Responses to Environmental Requests for Additional Information, Bell Bend Nuclear Power Plant, Luzerne County Pennsylvania

cc: Mr. Samuel J. Collins
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Mr. Michael Canova
Project Manager
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Ms. Stacey Imboden
Project Manager
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Enclosure 1

Response Status for Environmental Requests for Additional Information
Bell Bend Nuclear Power Plant
Luzerne County Pennsylvania

NRC Response Status for Environmental Requests for Additional Information (RAIs)		
RAI	Review Plan Section	Planned Submittal Schedule
ACC 7.1-1	ESRP 7.1.10	Submitted August 10, 2009
ACC 7.1-2	ESRP 7.1	Submitted August 5, 2009
ACC 7.2-1	ESRP 7.2	Submitted August 10, 2009
ACC 7.2-2	ESRP 7.2	Submitted August 10, 2009
ACC 7.2-3	ESRP 7.2	Submitted August 10, 2009
ACC 7.2-4	ESRP 7.2	Submitted August 10, 2009
ACC 7.2-5, (revised response)	ESRP 7.2	Submitted October 19, 2009
ACC 7.2-6	ESRP 7.2	Submitted August 10, 2009
ACC 7.3-1	ESRP 7.3	Submitted September 17, 2009
ACC 7.3-2	ESRP 7.3	Submitted August 10, 2009
ACC 7.3-3	N/A	Submitted August 10, 2009
ACC 7.3-4	N/A	Submitted September 25, 2009
ACC 7.3-5	N/A	Submitted August 10, 2009
MET 2.7-1	ESRP 2.7	May 14, 2010 ¹
MET 2.7-2	ESRP 2.7	Submitted November 30, 2009
MET 2.7-3	ESRP 2.7	Submitted September 11, 2009
MET 2.7-4	ESRP 2.7	Submitted September 17, 2009
MET 5.3-1	ESRP 2.7, ESRP 5.3.3.1	Submitted November 30, 2009
MET 5.3-2	ESRP 2.7, ESRP 5.3.3.1	Submitted August 10, 2009
MET 5.3-3	ESRP 5.3.3.1	Submitted August 10, 2009
MET 5.3-4	ESRP 5.3.3.1	Submitted September 11, 2009
MET 5.3-5	ESRP 5.3.3.1	Submitted August 10, 2009
MET 6.4-1	ESRP 2.7, ESRP 6.4	Submitted September 17, 2009
MET 6.4-2	ESRP 6.4	Submitted September 17, 2009
ALT 9.3-1	ESRP 9.3	Submitted November 30, 2009
ALT 9.3-2	ESRP 9.3	Submitted October 19, 2009
ALT 9.3-3	ESRP 9.3	Submitted September 11, 2009
ALT 9.3-4	ESRP 9.3	Submitted September 25, 2009
ALT 9.3-5	ESRP 9.3	Submitted November 30, 2009
AE 2.3-1	ESRP 2.3.1	Submitted October 19, 2009
AE 2.3-2	ESRP 2.3.1	Submitted August 5, 2009
AE 2.3-3	ESRP 2.3.1	Submitted September 25, 2009
AE 2.4-1	ESRP 2.4.2	Submitted August 5, 2009
AE 2.4-2	ESRP 2.4.2	Submitted August 5, 2009
AE 2.4-3	ESRP 2.4.2	Submitted August 5, 2009
AE 2.4-4	ESRP 2.4.2	Submitted August 5, 2009
AE 2.4-5	ESRP 2.4.2	Submitted August 5, 2009
AE 3.4-1	ESRP 3.4.2	Submitted August 10, 2009
AE 3.4-2	ESRP 3.4.2	Submitted November 30, 2009
AE 3.4-3	ESRP 3.4.2	Submitted August 10, 2009
AE 3.4-4	ESRP 3.4.2	Submitted August 10, 2009
AE 4.3-1	ESRP 4.3.2	Submitted August 5, 2009
AE 4.3-2	ESRP 4.3.2	August 16, 2010 ¹
AE 4.3-3	ESRP 4.3.2	Submitted October 19, 2009
AE 4.3-4	ESRP 4.3.2	Submitted November 30, 2009
AE 5.3-1	ESRP 5.3.1.2	Submitted August 10, 2009
AE 5.3-2	ESRP 5.3.1.2	Submitted August 5, 2009
AE 9.3-1	ESRP 9.3	Submitted November 30, 2009
AE 9.3-2	ESRP 9.3	Submitted September 17, 2009
AE 9.3-3	ESRP 9.3	Submitted September 17, 2009
AE 9.3-4	ESRP 9.3	Submitted November 30, 2009
CR 2.5-1	ESRP 4.1.3, ESRP 5.1.3	Submitted August 10, 2009

NRC Response Status for Environmental RAIs (continued)		
RAI	Review Plan Section	Planned Submittal Schedule
CR 2.5-2	ESRP 4.1.3	Submitted August 10, 2009
CR 2.5-3	ESRP 4.1.3, ESRP 5.1.3	Submitted August 10, 2009
CR 2.5-4	ESRP 4.1.3, ESRP 5.1.3	Submitted August 10, 2009
CR 2.5-5	ESRP 2.5.2, ESRP 2.5.3	Submitted August 10, 2009
CR 2.5-6	ESRP 2.5.2, ESRP 2.5.3	Submitted January 15, 2010
CR 2.5-6 (supplemental response)	ESRP 2.5.2, ESRP 2.5.3	Included in Enclosure 2
CR 2.5-7	ESRP 4.1.3, ESRP 5.1.3	Submitted November 30, 2009
CR 2.5-8	ESRP 4.1.3, ESRP 5.1.3	Submitted November 30, 2009
STO 1-1	N/A	Submitted October 19, 2009
STO 1-1 (revised response)	N/A	Submitted November 9, 2009
STO 2.1-1	ESRP 2.2, 2.4, 2.5, 4.3	April 30, 2010 ¹
STO 2.1-2	ESRP 2.1	Submitted August 10, 2009
STO 2.2-1	ESRP 2.2	Submitted September 17, 2009
STO 2.3-1	ESRP 2.3	Submitted September 25, 2009
GEO 2.6-1	ESRP 2.6	Submitted September 11, 2009
H 2.3-1	ESRP 2.3-2	Submitted September 17, 2009
H 2.3-2	ESRP 2.3-2	Submitted September 17, 2009
H 3.4-1	ESRP 3.4-1	Submitted September 25, 2009
H 3.6-1	ESRP 3.6-1	Submitted September 17, 2009
H 3.6-2	ESRP 3.6-1	Submitted August 5, 2009
H 4.2-1	ESRP 4.2.1	August 16, 2010 ¹
H 5.2-1	ESRP 5.2.2	Submitted September 25, 2009
H 5.3-1	ESRP 5.3.2.1	Submitted November 30, 2009
H 5.3-1 (revised response)	ESRP 5.3.2.1	Submitted December 17, 2009
H 6.3-1	ESRP 6.3	Submitted October 19, 2009
H 9.3-1	ESRP 9.3	Submitted November 30, 2009
H 9.4-1	ESRP 9.4.2	Submitted August 10, 2009
H 9.4-2	ESRP 9.4.2	Submitted August 10, 2009
H 9.4-3	ESRP 9.4.2	Submitted September 11, 2009
LU 2.2-1	ESRP 2.2.1	Submitted August 5, 2009
LU 3.7-1	ESRP 4.1	August 16, 2010 ¹
LU 4.1-1	ESRP 4.1	August 16, 2010 ¹
LU 5.1-1	ESRP 4.1	August 16, 2010 ¹
LU 5.1-2	ESRP 4.1	August 16, 2010 ¹
NRHH 10.5-1	N/A	Submitted August 10, 2009
RHH 4.5-1	ESRP 4.5, ESRP 5.4.2	Submitted August 10, 2009
RHH 4.5-2	ESRP 4.5	Submitted October 19, 2009
RHH 4.5-3	ESRP 4.5	Submitted September 25, 2009
RHH 5.4-1	ESRP 5.4.2	Submitted September 11, 2009
SE 2.5-1	ESRP 2.5.1	Submitted August 5, 2009
SE 2.5-2	ESRP 2.5.1	Submitted November 30, 2009
SE 2.5-3	ESRP 2.5.2	Submitted October 19, 2009
SE 2.5-4	ESRP 2.5.2	Submitted October 19, 2009
SE 2.5-5	ESRP 2.5.2	Submitted August 10, 2009
SE 2.5-6	ESRP 2.5.2	Submitted August 5, 2009
SE 2.5-7	ESRP 2.5.2	Submitted October 19, 2009
SE 2.5-8	ESRP 2.5.2	Submitted October 19, 2009
SE 2.5-9	ESRP 2.5.2	Submitted September 11, 2009
SE 2.5-10	ESRP 2.5.4	Submitted September 17, 2009
SE 2.5-11	ESRP 2.5.4	Submitted August 10, 2009
SE 2.5-12	ESRP 2.5.4	Submitted August 10, 2009
SE 2.5-13	ESRP 2.5.4	Submitted September 17, 2009
SE 4.4-1	ESRP 4.4.1	Submitted August 10, 2009
SE 4.4-2	ESRP 4.4.1	Submitted August 10, 2009

NRC Response Status for Environmental RAIs (continued)		
RAI	Review Plan Section	Planned Submittal Schedule
SE 4.4-3	ESRP 4.4.2	Submitted September 25, 2009
SE 4.4-4	ESRP 4.4.2	Submitted November 30, 2009
SE 4.4-5	ESRP 4.4.2	Submitted August 5, 2009
SE 4.4-6	ESRP 4.4.2	Submitted August 10, 2009
SE 4.4-7	ESRP 4.4.2	Submitted September 17, 2009
SE 4.4-8	ESRP 4.4.2	Submitted September 17, 2009
SE 4.4-9	ESRP 4.4.2	Included in Enclosure 2
SE 4.4-10	ESRP 4.4.2	Submitted September 17, 2009
SE 4.4-11	ESRP 4.4.2	Submitted October 19, 2009
SE 4.4-12	ESRP 4.4.2	Submitted September 25, 2009
SE 4.4-13	ESRP 4.4.2	Submitted October 19, 2009
SE 4.4-14	ESRP 4.4.3	Submitted September 17, 2009
SE 5.8-1	ESRP 5.8.2	Submitted September 17, 2009
SE 5.8-2	ESRP 5.8.2	Submitted August 5, 2009
CB 10.4-1	ESRP 10.4.2	Included in Enclosure 2
TE 2.4-1	ESRP 2.2.1	Submitted August 10, 2009
TE 2.4-1 (revised response)	ESRP 2.2.1	Submitted October 19, 2009
TE 2.4-2	ESRP 2.2.1	Submitted August 5, 2009
TE 2.4-3	ESRP 2.4.1	Submitted September 11, 2009
TE 2.4-4	ESRP 2.4.1	Submitted August 10, 2009
TE 2.4-5 (revised response)	ESRP 2.4.1	Submitted September 11, 2009
TE 2.4-6	ESRP 2.4.1	April 30, 2010 ¹
TE 2.4-7	ESRP 2.4.1	April 30, 2010 ¹
TE 2.4-8	ESRP 2.4.1	September 3, 2010 ¹
TE 4.3-1	ESRP 4.3.1	September 3, 2010 ¹
TE 4.3-2	ESRP 4.3.1	September 3, 2010 ¹
TE 4.3-3	ESRP 4.3.1	Submitted September 11, 2009
TE 4.3-4	ESRP 4.3.1	September 3, 2010 ¹
TE 4.3-5	ESRP 4.3.1	Submitted August 10, 2009
TE 4.3-6	ESRP 4.3.1	Submitted August 10, 2009
TE 4.3-7	ESRP 4.3.1, ESRP 9.3	September 3, 2010 ¹
TE 4.3-8	ESRP 4.3.1	September 3, 2010 ¹
TE 4.3-9	ESRP 4.3.1	Submitted September 25, 2009
TE 4.3-10	ESRP 4.3.1	September 3, 2010 ¹
TR 4.7-1	ESRP 4.7	Submitted September 25, 2009
TR 4.7-2	ESRP 4.7	Submitted August 10, 2009

USACE Response Status for Environmental RAIs	
RAI	Planned Submittal Schedule
USACE-1	Submitted January 15, 2010
USACE-1a	June 15, 2010 ¹
USACE-1b	June 15, 2010 ¹
USACE-2	September 3, 2010 ¹
USACE-2a	June 15, 2010 ¹
USACE-2b	Submitted November 30, 2009
USACE-2c	Submitted November 30, 2009
USACE-2d	Submitted November 30, 2009
USACE-2e	June 15, 2010 ¹
USACE-2f	June 15, 2010 ¹
USACE-2g	Submitted September 25, 2009
USACE-2h	September 30, 2011 ¹
USACE-3	September 3, 2010 ¹

¹The responses to these RAIs were requested to be provided within 30 calendar days. Based on the impact of the recent decision to change the BBNPP plot plan, the time required to complete the necessary work will exceed this timeframe and PPL requests additional time, as indicated above.

Enclosure 2

Responses to Environmental Requests for Additional Information
Bell Bend Nuclear Power Plant
Luzerne County Pennsylvania

CR 2.5-6ESRP 2.5.2ESRP 2.5.3

Summary: *Provide copies of all consultation letters with other Interested parties. Explain how Interested Parties were informed and contacted. Provide list of Interested Parties who have expressed interest or concerns regarding cultural impacts and copies of any correspondence.*

Full Text: The consultation process is an important component of the Section 106 consultation process under Advisory Council procedures. Describe the efforts to contact members of the community to discover potential concerns and reasonable concerns.

Response: Letters of invitation were sent to parties that may be potentially interested in the cultural resources that may exist at the BBNPP site. Each letter included a form that the interested party may complete and return to indicate desire to participate, or not, in the National Historic Preservation Act Section 106 consultation process.

Enclosure 3 (in the previous response letter dated January 15, 2010) contains copies of the letters of invitation sent, and the one response received to date regarding the Section 106 consultation process.

The potentially interested parties are:

- Anthony T. P. Brooks, Luzerne County Historical Society
- Jim Stout, Berwick Historical Society
- Ted Baird, Society for Pennsylvania Archaeology
- Adrian Merolli, Luzerne County Planning Commission
- Dr. Katherine Faull, Bucknell University
- Robert M. Pearse, Salem Township Supervisor

Mr. Baird of the Society for Pennsylvania Archaeology has returned his form requesting to be considered a consulting party.

Should forms from other potentially interested parties be received by PPL Bell Bend, the forms will be transmitted to the U.S. NRC in a supplemental response to this RAI.

Response supplement: The remaining responses to the letters of invitation have been received. In addition to Mr. Baird, the following parties have expressed interest in participating in the National Historic Preservation Act Section consultation process: Mr. Stout, Mr. Merolli, Dr. Faull, and Mr. Pearse. Copies of their responses regarding the Section 106 consultation process are below. Mr. Brooks, Luzerne County Historical Society, has declined the invitation.

This supplement concludes the response to this RAI.

COLA Impact:

No changes to the BBNPP COLA ER are required as a result of this RAI response.

Request for Consulting Party Status

**Bell Bend Nuclear Power Plant Project
Luzerne County, Pennsylvania**

RECEIVED JAN 21 2010

We, Berwick Historical Society by signature of an authorized representative below are (check one box only):

requesting to be considered a consulting party

indicating that we do not want to be considered as a consulting party

for the purposes of consultation under 36 CFR §800.6 for the Bell Bend Nuclear Power Plant Project, Luzerne County, Pennsylvania.

SIGNED

Name: Jim Stout

Title: President

Signature: William A. Vogel V.P. of BERWICK HISTORICAL SOCIETY FOR JIM STOUT.

Date: 1/16/10

ALL WE WOULD LIKE IS A COPY OF THE REPORTS WHEN FINISHED FOR OUR LIBRARY AS THIS INFORMATION MAY BE USEFUL IN THE FUTURE!

Please return an original signed copy of the form to the address below, retaining a copy for your records.

PPL Bell Bend, LLC
38 Bomboy Lane, Suite 2
Berwick, PA 18603
Attn: R. R. Sgarro

Request for Consulting Party Status

**Bell Bend Nuclear Power Plant Project
Luzerne County, Pennsylvania**

We, Luzerne County Planning Commission by signature of an authorized representative below are (check one box only):

- requesting to be considered a consulting party
- indicating that we do not want to be considered as a consulting party

for the purposes of consultation under 36 CFR §800.6 for the Bell Bend Nuclear Power Plant Project, Luzerne County, Pennsylvania.

SIGNED

Name: Adrian Merolli

Title: Director

Signature: *Adrian Merolli*

Date: 1-30-10

Please return an original signed copy of the form to the address below, retaining a copy for your records.

PPL Bell Bend, LLC
38 Bomboy Lane, Suite 2
Berwick, PA 18603
Attn: R. R. Sgarro

RECEIVED FEB 28 2010

Request for Consulting Party Status

Bell Bend Nuclear Power Plant Project
Luzerne County, Pennsylvania

I, Katherine Faul

We, ~~Buckner University~~ by signature of an authorized representative below are (check one box only).

- requesting to be considered a consulting party
- indicating that we do not want to be considered as a consulting party

for the purposes of consultation under 36 CFR §800.6 for the Bell Bend Nuclear Power Plant Project, Luzerne County, Pennsylvania.

SIGNED

Name: Dr. Katie Faul

Title: Professor of German & Humanities

Signature: Katherine Faul

Date: 2/18/10

Please return an original signed copy of the form to the address below, retaining a copy for your records.

PPL Bell Bend, LLC
38 Bomboy Lane, Suite 2
Berwick, PA 18603
Attn: R. R. Sgarro

Request for Consulting Party Status
Bell Bend Nuclear Power Plant Project
Luzerne County, Pennsylvania

We, Salem Township Supervisors by signature of an authorized representative below are (check one box only):

- requesting to be considered a consulting party
- indicating that we do not want to be considered as a consulting party

for the purposes of consultation under 36 CFR §800.6 for the Bell Bend Nuclear Power Plant Project, Luzerne County, Pennsylvania.

SIGNED

Name: Robert M. Pearce

Title: Chairman

Signature: 

Date: 2-9-10

Please return an original signed copy of the form to the address below, retaining a copy for your records.

PPL Bell Bend, LLC
38 Bomboy Lane, Suite 2
Berwick, PA 18603
Attn: R. R. Sgarro

SE 4.4-9**ESRP 4.4.2**

Summary: *Provide annual expenditures on materials, equipment, and outside services during construction.*

Full Text: Sections 5.8.2.4.1 and 5.8.3.2.3 note that PPL Bell Bend, LLC will spend about \$9 million annually on materials, equipment, and outside services. Annual expenditures during construction and operation should be differentiated.

Response:

Section 5.0 predicts the "Impacts of Station Operation" and the statement that Bell Bend, LLC will spend about \$9 million annually (exclusive of planned outage costs) is an estimate of the expenditures associated entirely with future plant operations that could be made in the 50 Mile (80 km) Comparative Geographic Area (CGA). These estimated expenditures are not associated with the proposed construction of the BBNPP.

The foregoing estimate of local operational expenditures is in part based on the historical experience of operating the adjacent Susquehanna nuclear power plant. At the current stage of planning of the BBNPP, detailed cost estimates have not progressed sufficiently to make detailed estimates of associated non-construction labor expenditures in the 50 Mile CGA.

However, it is clear that large quantities of the commodity types of materials, supplies and services are available within the 20-county region surrounding the site. The quantities of commodity type construction materials (concrete, steel, piping and mechanical material, and electrical equipment) are included in ER Table 10.2-2. The local purchase of these materials is expected to have the greatest economic impact on the region. Quantities from Table 10.2-2 have been used as the principal basis for estimating the expenditures that could be made in the region.

A U.S. Department of Energy analysis (DOE, 2005) provided bulk material pricing that was applied to the quantities taken from ER Table 10.2-2 to develop the total cost estimate.

Notwithstanding the fact that materials, equipment, and outside services will be purchased by several tiers of contractors and subcontractors that are not currently identified, it is estimated that more than \$250 million could be spent in the region during the 68 month period of construction.

Reference cited in this response:

DOE, 2005. Cost Estimating Guidelines for Generation IV Nuclear Energy Systems, Rev. 2.02, U.S. Department of Energy, September 2005.

COLA Impact:

No changes to the BBNPP COLA ER are required as a result of this RAI response.

CB 10.4-1**ESRP 10.4.2**

Summary: *Provide a more detailed estimate of the construction costs and the cost of supplying the power (\$/MW) at the BBNPP. The estimated BBNPP cost must include more detailed cost categories (e.g., power block, turbine buildings, and any element used in electricity generation). These should be overnight costs, not including interest expense. Transmission lines should not be included in the estimated costs for the BBNPP.*

Full Text: None.

Response:

At the present time, engineering estimating and scheduling has advanced to the stage that it is possible to estimate the elements of cost associated with the construction of a USEPR. However, site-specific estimates for the Bell Bend Nuclear Power Plant (BBNPP) are not yet as advanced, particularly in view of the recent decision to relocate the powerblock within the existing project boundary in order to substantially avoid wetlands impacts. Once the engineering estimating and scheduling have progressed to the current level of the USEPR, it would be possible to provide estimated dollar value overnight costs.

Although the total cost estimates differ between the USEPR and the BBNPP, the relative distribution of BBNPP costs projected for the Nuclear Island, Turbine Island and Balance of Plant, which are the major cost elements associated with power generation, are predicted to be comparable. These cost distributions are derived by allocating overall costs in proportion to USEPR current labor cost estimates available for the stated elements of generation. Overall the estimated distribution of power production related overnight costs for the BBNPP are as follows:

- Nuclear Island: 68.80%
- Turbine Island: 14.16%
- Balance of Plant: 17.03%

These costs are incurred on a variable basis during the period of construction as follows:

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6
• Nuclear Island:	72.2%	60.5%	58.4%	80.9%	85.1%	100%
• Turbine Island:	0.1%	13.8%	13.7%	16.1%	14.9%	0.0%
• Balance of Plant:	27.7%	25.6%	27.9%	3.0%	0.0%	0.0%

Note: Year 2 adds up to 99.9% due to rounding.

COLA Impact:

No changes to the BBNPP COLA ER are required as a result of this RAI response.