



Tennessee Valley Authority, 1101 Market Street, LP 5A, Chattanooga, Tennessee 37402-2801

June 11, 2008

10 CFR 52.79

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

In the Matter of)
Tennessee Valley Authority)

Docket No. 52-014 and 52-015

**BELLEFONTE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION – FIRE PROTECTION CHANGE PROCESS**

Reference: Letter from Tanya Simms (NRC) to Andrea L. Sterdis (TVA), Request for
Additional Information Letter No. 008 Related to SRP Section 09.05.01 for the
Bellefonte Units 3 and 4 Combined License Application, dated May 5, 2008.

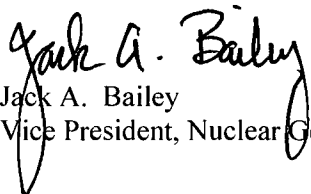
This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory
Commission's (NRC) request for additional information (RAI) items included in the reference
letter.

A response to each NRC request in the subject letter is addressed in the enclosure and also
identifies any associated changes that will be made in a future revision of the BLN application.

If you should have any questions, please contact Phillip Ray at 1101 Market Street, LP5A,
Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7030, or via email at
pmray@tva.gov.

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

Executed on this 11th day of June, 2008


Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure
See page 2

DOSS
NRO

Document Control Desk

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cc: (Enclosure)
E. Cummins, Westinghouse
S. P. Frantz, Morgan Lewis
M.W Gettler, FP&L
R. C. Grumbir, NuStar
P. Hinnenkamp, Entergy
D. Lindgren, Westinghouse
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cc: (w/o Enclosure)
R. H. Kitchen, PGN
M.C Kray, NuStart
A.M.Monroe, SCE&G
R. Pierce, SNC
R. Register, DOE/PM
L. Reyes, NRC/RII
J.M. Sebrosky, NRC/HQ

Enclosure
TVA letter dated June 11, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 008 dated May 5, 2008.
(2 pages)

Subject: Fire Protection program change process

<u>RAI Number</u>	<u>Date of TVA Response</u>
09.05.01-01	This letter – see following pages

<u>Attachments / Enclosures</u>
None

Pages Included

Enclosure
TVA letter dated June 11, 2008
RAI Responses

NRC Letter Dated: May 5, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 09.05.01-01

The Bellefonte COLA, Part 10, Page LC-6, proposes a license condition allowing self-approval of changes that impact the approved fire protection program if "those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire." As noted in Regulatory Position 1.8.1 of RG 1.189, Rev.1, this criterion should not be applied to new reactor plants. The change process for new reactor fire protection programs should be the same as that for the rest of the plant, i.e., in accordance with 10 CFR 52.98(c). The COL application should be revised accordingly.

BLN RAI ID: 0329

BLN RESPONSE:

Based on Regulatory Guide 1.189, Revision 1, Regulatory Position 1.8.1, which states changes to new reactor Fire Protection Programs that do not require exemption requests should be evaluated and processed in accordance with 10 CFR 50.59, and the additional requirements for processing changes and exemptions for new reactors that are based on a certified design included in Appendices to 10 CFR Part 52, the COL application will be revised to remove proposed License Condition 4 allowing self-approval of changes for the fire protection program description.

This response is expected to be STANDARD for the S-COLAs.

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 10, Proposed License Condition 4, "Fire Protection Program Revisions," will be revised to remove the proposed condition to read:

"4. Not used."

ATTACHMENTS/ENCLOSURES:

None