



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

June 26, 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 – QUALITY ASSURANCE

Reference: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for
Additional Information Letter No. 013 Related to SRP Section 17.5 for the
Bellefonte Units 3 and 4 Combined License Application, dated May 12, 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 which 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 26th day of June, 2008.

Andrea L. Sterdis
Manager, New Nuclear Licensing and Industry Affairs
Nuclear Generation Development & Construction

Enclosure
See Page 3

DD85
NRO

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cc: (Enclosures)

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- E. Cummins, Westinghouse
- S. P. Frantz, Morgan Lewis
- M. W. Gettler, FP&L
- R. C. Grumbir, NuStart
- P. S. Hastings, NuStart
- P. Hinnenkamp, Entergy
- R. G. Joshi, NRC/HQ
- M. C. Kray, NuStart
- D. Lindgren, Westinghouse
- G. D. Miller, PG&N
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- B. C. Anderson, NRC/HQ
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- A. Monroe, SCE&G
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- R. Reister, DOE/PM
- L. Reyes, NRC/RII
- T. Simms, NRC/HQ
- J. M. Sebrosky, NRC/HQ

Enclosure
TVA letter dated June 26, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 013 dated May 12, 2008
(19 pages, including this list)

Subject: Quality Assurance

<u>RAI Number</u>	<u>Date of TVA Response</u>
17.5-01	This letter – see following pages
17.5-02	This letter – see following pages
17.5-03	This letter – see following pages
17.5-04	This letter – see following pages
17.5-05	This letter – see following pages
17.5-06	This letter – see following pages
17.5-07	This letter – see following pages
17.5-08	This letter – see following pages
17.5-09	This letter – see following pages

Attachments / Enclosures

None

Pages Included

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NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-01

Section 17.5 of the Bellefonte Final Safety Analysis Report (FSAR) refers to the quality assurance program description (QAPD) provided in Part 11 of the Bellefonte application. Part I, Introduction, Section 1, General, of the QAPD states, in part, that TVA QAPD is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for construction/pre-operation and/or operations activities conducted by or for TVA. Section 1.1, Scope / Applicability, of the QAPD, states that “the QAPD applies only to Bellefonte Units 3 and 4 Combined Operating License (COL), construction/pre-operation and operations activities...” Based on the above, please explain how Section 1 and Section 1.1 of the QAPD described in Part 11 of the Bellefonte COLA are consistent in describing the scope of the QAPD. Additionally, please explain how the statement from QAPD Section 1, referring to “and/or operations,” is consistent with the list of operational programs in Table 13.4-201 of the Bellefonte FSAR, which does not appear to refer to the QAPD.

BLN RAI ID: 339

BLN RESPONSE:

As identified in FSAR Section 17.1, the “Quality Assurance Program Description” (QAPD) discussed in Section 17.5 will become effective at COL issuance, and establishes the QA program requirements for the remaining portion of the design and construction phases. The QAPD discussed in Section 17.5 is the QAPD provided in Part 11 of the Bellefonte application. This description of applicability is consistent with the QAPD Part I, Section 1 as identified in the RAI. QAPD Part I, Section 1.1 states “This QAPD applies only to Bellefonte Units 3 & 4 Combined Operating License (COL), construction/pre-operation and operations activities affecting” The inclusion of “Combined Operating License (COL)” in this location was intended to emphasize that this QAPD applies to activities after the receipt of the COL. To avoid confusion, the FSAR and the QAPD will be revised as shown below.

With regard to the question relative to the operational programs in Table 13.4-201, Item 16, the “Quality Assurance Program – Operation” is the QAPD provided in Part 11 of the COLA. Please note that the implementation milestone shown in Table 13.4-201 is 30 days prior to scheduled date for the initial loading of fuel. This implementation milestone recognizes that portions of the QAPD are specific to operations activities. Examples of these operations related requirements are Part II Section 2.7, Section 3.4, and Section 6.1. TVA will begin implementation of the QAPD at COL Issuance; however, as indicated in Table 13.4, full implementation of all Operations related requirements will occur not later than 30 days prior to fuel load.

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 2, FSAR Section 17.1, final paragraph. will be revised from:

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The "Quality Assurance Program Description" (QAPD) discussed in Section 17.5 will become effective at COL issuance, and establishes the QA program requirements for the remaining portion of the design and construction phases.

To read:

Implementation of the applicable portions of the "Quality Assurance Program Description" (QAPD) discussed in Section 17.5 begins at COL Issuance. The program establishes the QA program requirements for the remaining portion of the design and construction phases and for operations; however, full implementation of the Operations related requirements will be no later than as indicated in Table 13.4-201.

2. COLA Part 11, QAPD, Part I, Section 1, first sentence, will be revised ("/or" removed) from:

The Tennessee Valley Authority (TVA) Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for construction/pre-operation and/or operations activities conducted by or for TVA.

To read:

The Tennessee Valley Authority (TVA) Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for construction/pre-operation and operations activities conducted by or for TVA.

3. COLA Part 11, QAPD, Part I, Section 1.1, first sentence, will be revised (comma removed) from:

This QAPD applies only to Bellefonte Units 3 & 4 Combined Operating License (COL), construction/preoperation and operations activities affecting the quality and performance of safety-related structures, systems, and components, including, but not limited to:

To read:

This QAPD applies only to Bellefonte Units 3 & 4 Combined Operating License (COL) construction/pre-operation and operations activities affecting the quality and performance of safety-related structures, systems, and components, including, but not limited to:

ATTACHMENTS/ENCLOSURES:

None

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NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-02

Part 1, Section 1.1 of the QAPD lists the activities affecting quality to which the QAPD applies. Although this list is not all-inclusive, siting is listed as an activity affecting quality to which the QAPD applies. Since this QAPD would not become effective until COL issuance, please clarify how siting activities would be subject to its provisions.

BLN RAI ID: 340

BLN RESPONSE:

During the preparation of the site specific QAPD, the inclusion of "siting" in the list of activities included in the NEI 06-14A template was inadvertently retained. The RAI correctly identifies that by the COL issuance, the siting activities will be complete. Therefore, "siting" will be removed from this list of activities.

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 11, QAPD, Part I, Section 1.1, listing of activities, will be revised (to remove "Siting") from:

Constructing	Testing	Siting	Erecting	Modifying
To read:				
Constructing	Testing		Erecting	Modifying

ATTACHMENTS/ENCLOSURES:

None

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NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-03

Part II, QAPD Details, Section 1, Organization, of the Bellefonte QAPD states, in part, that the TVA Nuclear Power Group and the Nuclear Generation Development and Construction (NGDC) organization are described in the QAPD. Appendix B to 10 CFR Part 50 states, in part, that every applicant for a combined license under 10 CFR part 52 is required by the provisions of 10 CFR 52.79 to include in its FSAR a description of the quality assurance applied to the design, and to be applied to the fabrication, construction, and testing of SSCs of the facility and to the managerial and administrative controls to be used to assure safe operation. Please provide the QAPD's description of the managerial organization for operations, including the functions of the following positions that are referred to in Section 1 and Section 2.7, Independent Review: Chief Operating Officer, Executive Vice President, Site Vice President, Site Director, and Plant Manager. The NRC staff notes that TVA Nuclear Quality Assurance (NQA) Plan (TVA-NQA-PLN89-A) revision 18 contains adequate detail of the operations organization for the existing TVA fleet. Please provide similar information in the Bellefonte QAPD to address the applicable requirements of Appendix B.

BLN RAI ID: 341

BLN RESPONSE:

The QAPD will be revised to add a high level functional organization chart as QAPD APPENDIX A and to provide more details in the operations area. QAPD Part II, Section 1 will be revised to provide additional details of the generic managerial organization for operations and to include the Chief Operating Officer, BLN Plant Management, Nuclear Oversight and Assistance, and Nuclear Licensing as shown below in the Application Revision section.

This response is PLANT SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 11, QAPD, will be revised as follows:

a. Revise the title of the QAPD from:

Nuclear Generation Development and Construction Quality Assurance Program
Description

To read:

TVA Bellefonte Units 3 and 4 Quality Assurance Program Description.

2. COLA Part 11, QAPD, Part II, "QAPD Details," will be revised as follows:

a. Revise SECTION 1, ORGANIZATION, to read as follows:

This section describes the TVA organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes offsite and on-site functions for Bellefonte (BLN). Implementing documents assign more specific responsibilities and

duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QAPD. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

TVA management is responsible to size the Quality Assurance organization commensurate with the duties and responsibilities assigned.

The Chief Nuclear Officer (CNO) has the overall responsibility for the establishment, implementation, and administration of TVA's QAPD and the evaluation of its effectiveness. In addition, the CNO is responsible for the safe, reliable, and efficient operation of TVA nuclear plants, including BLN beginning at fuel load.

The Nuclear Generation Development and Construction (NGDC) organization is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operations development activities up to the beginning of fuel load.

CNO and NGDC responsibilities are administered through their management staffs, such as shown in APPENDIX A.

Design, engineering and environmental services are provided to NGDC through agreements and/or contracts that identify the engineer, procurement and constructor contractors for the units. These agreements and contracts will extend the quality assurance requirements described in this document to applicable contractors and subcontractors.

The following sections describe the reporting relationships, functional responsibilities and authorities for organizations implementing and supporting this QAPD. The CNO and NGDC organizations are described herein.

More detailed organization charts for various departments/locations are contained in Chapter 13 of the BLN 3&4 Final Safety Analysis Report which describes organizational positions and specific functions and responsibilities. Inclusion of APPENDIX A as a high level functional organization for implementation of the QAPD provides sufficient information to assure QA requirements are identified and implemented.

1.1 Chief Executive Officer (CEO)

The CEO is responsible for the design, construction and operation of TVA's nuclear plants. The CEO is also responsible for the technical and administrative support activities provided by TVA and contractors. The CEO, through the Chief Operating Officer (COO), directs the CNO and the executive responsible for Nuclear Generation Development and Construction (NGDC). The CEO also directs the executive responsible for Administrative Services. The CEO reports to the TVA Board of Directors with respect to all matters.

1.2 Chief Operating Officer (COO)

As delegated from the CEO, the COO is responsible the design, construction and operations of TVA's nuclear plants. The COO directs the CNO and the executive responsible for NGDC.

1.3 Nuclear Generation Development and Construction (NGDC)

The executive responsible for the NGDC organization reports to the COO and is responsible for new nuclear plant licensing, engineering, procurement, construction, startup and operational development activities and is responsible for the implementation of this QAPD for NGDC activities. The NGDC executive also directs the planning and development of the NGDC staff and organization resources. The NGDC executive is also responsible for establishing and managing the development of new nuclear generation.

1.3.1 BLN Engineering, Procurement, and Construction

The executive responsible for the BLN engineering, procurement, and construction reports to the executive responsible for NGDC and is responsible for the overall implementation of quality assurance requirements for engineering, procurement, construction, and pre-operational and startup testing for BLN up to fuel load.

1.3.2 Project Licensing

The manager responsible for Project Licensing is responsible for licensing activities and reports to the executive responsible for NGDC up to fuel load. Licensing continuity is assured by transition of the licensing function to the BLN Plant Management through organization, staff, knowledge, records, reports, process, procedures, commitments, and interfaces. The CNO and NGDC agree to the details of when and how to effect this transition at such time as needed.

1.4 Administrative Services

The executive responsible for Administrative Services reports to the CEO and is responsible for managing the overall Administrative Services organization including assuring that Supply Chain Management and Information Technology, including contracts and procurement support NGDC activities in accordance with the QAPD.

1.5 Chief Nuclear Officer (CNO)

The CNO reports to the COO and is the executive responsible for the safe, reliable, and efficient operation of TVA nuclear plants. The CNO directs operations through site executives, both for the operating plants and for NGDC pre-operational support as needed. The CNO assures implementation of this QAPD through the manager responsible for Quality Assurance by oversight and implementation planning for this QAPD.

Prior to preoperational testing, the BLN Plant Management executive, with support from Nuclear Support, Engineering and Projects, Performance Improvement, and Quality Assurance establish the processes and organization of managers, supervisors, and staff needed to perform required operation functions to support NGDC and perform safe plant operation.

1.5.1 Nuclear Support (NS)

The executive responsible for nuclear support reports to the CNO and is responsible for ensuring that the QA requirements established by this QAPD are either included or referenced (as appropriate) in programs and areas of responsibility such as nuclear outage management, security, operational programs, maintenance and modifications.

1.5.2 Engineering and Projects

The executive responsible for engineering and projects reports to the CNO and is responsible for ensuring that the QA requirements established by this QAPD are either included or referenced (as appropriate) in programs and areas of responsibility such as corporate engineering, plant reliability, inspection services, computer engineering, project management, fuel supply and disposal, and nuclear fuel, as well as independent technical reviews, such as system performance monitoring as required by the Maintenance Rule, technical operability evaluations, technical specification changes that affect the design basis, review of FSAR changes that affect the design basis, and self assessments to ensure maintenance of design basis and adequacy of technical programs.

1.5.3 Nuclear Oversight and Assistance

The manager responsible for Nuclear Oversight and Assistance reports to the CNO and provides oversight and management for quality assurance, nuclear training, and special assistance. While the managers of Quality Assurance and Training functionally report to the manager for Nuclear Oversight and Assistance, they retain direct accessibility to the CNO for matters of safety and quality.

Quality Assurance

The manager responsible for quality assurance reports to the manager of Nuclear Oversight and Assistance and has direct access to the CNO and NGDC for matters affecting safety and quality. He is responsible for independent planning and for performing activities to verify the development and effective implementation of this QAPD. The quality assurance organization assures that quality assurance requirements are identified and implemented for safety-related activities as prescribed in this QAPD, including but not limited to licensing, engineering, procurement, construction, operations, document control, problem identification and reporting activities. The Quality Assurance organization is responsible for independently planning and performing activities to verify the development and effective implementation of the NRC-approved Nuclear Quality Assurance Plan (NQA Plan) for existing nuclear plants as well.

The manager responsible for quality assurance has direct lines of communication to the executive responsible for NGDC and the CNO and is responsible for developing and maintaining this QAPD and the NQA Plan for existing plant operations, evaluating compliance to the programs and managing the QA organization resources.

Project Quality Assurance

The Quality Assurance Project Manager (QAPM) reports to the manager responsible for quality assurance and has direct lines of communication to the site executive responsible for BLN engineering, procurement, and construction, and is responsible for the development and verification of implementation of this QAPD. The QAPM is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; for monitoring organization processes to ensure conformance to commitments and licensing document requirements; and for ensuring that vendors providing quality services, parts and materials are meeting the requirements of 10 CFR 50, Appendix B through Nuclear Procurement Issues Committee (NUPIC) or TVA vendor audits. The QAPM has sufficient independence from other NGDC priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas of NGDC activities. The QAPM may make recommendations to NGDC management regarding improving the quality of work processes. If the QAPM disagrees with any action taken relative to QAPD implementation and is unable to obtain resolution, the QAPM shall inform the manager responsible for quality assurance and, if necessary, bring the matter to the attention of the executive responsible for NGDC, who determines the final disposition.

1.5.4 BLN Plant Management

The executive responsible for BLN Plant Management reports to the CNO and is responsible for safe operations and operational support for NGDC (as needed), ensuring that quality assurance requirements are met. This executive is responsible for nuclear operations, maintenance, training, site engineering and technical support, modifications, and outage management. This executive is also responsible for fire protection, the technical review process and the Plant Operations Review Committee.

1.5.5 Nuclear Licensing

The manager responsible for licensing reports to the CNO and is responsible for maintaining the interface between TVA and NRC for licensing activities and managing the Nuclear Safety Review Board, which is the offsite committee that provides senior level oversight of TVA's nuclear program with respect to nuclear safety.

1.6 Authority to Stop Work

Quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to off-site work performed by suppliers furnishing safety-related materials and services to TVA.

1.7 Quality Assurance Organizational Independence

For the NGDC, independence shall be maintained between the organization or organizations performing the checking (quality assurance and quality control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

1.8 NQA-1-1994 Commitment

In establishing its organizational structure, TVA commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.

- b. Revise SECTION 2, QUALITY ASSURANCE PROGRAM, Section 2.7, item e, from:
 - e. Reviews any matter related to nuclear safety that is requested by the Site Vice President, Site Director, Plant Manager, or any IRC member.

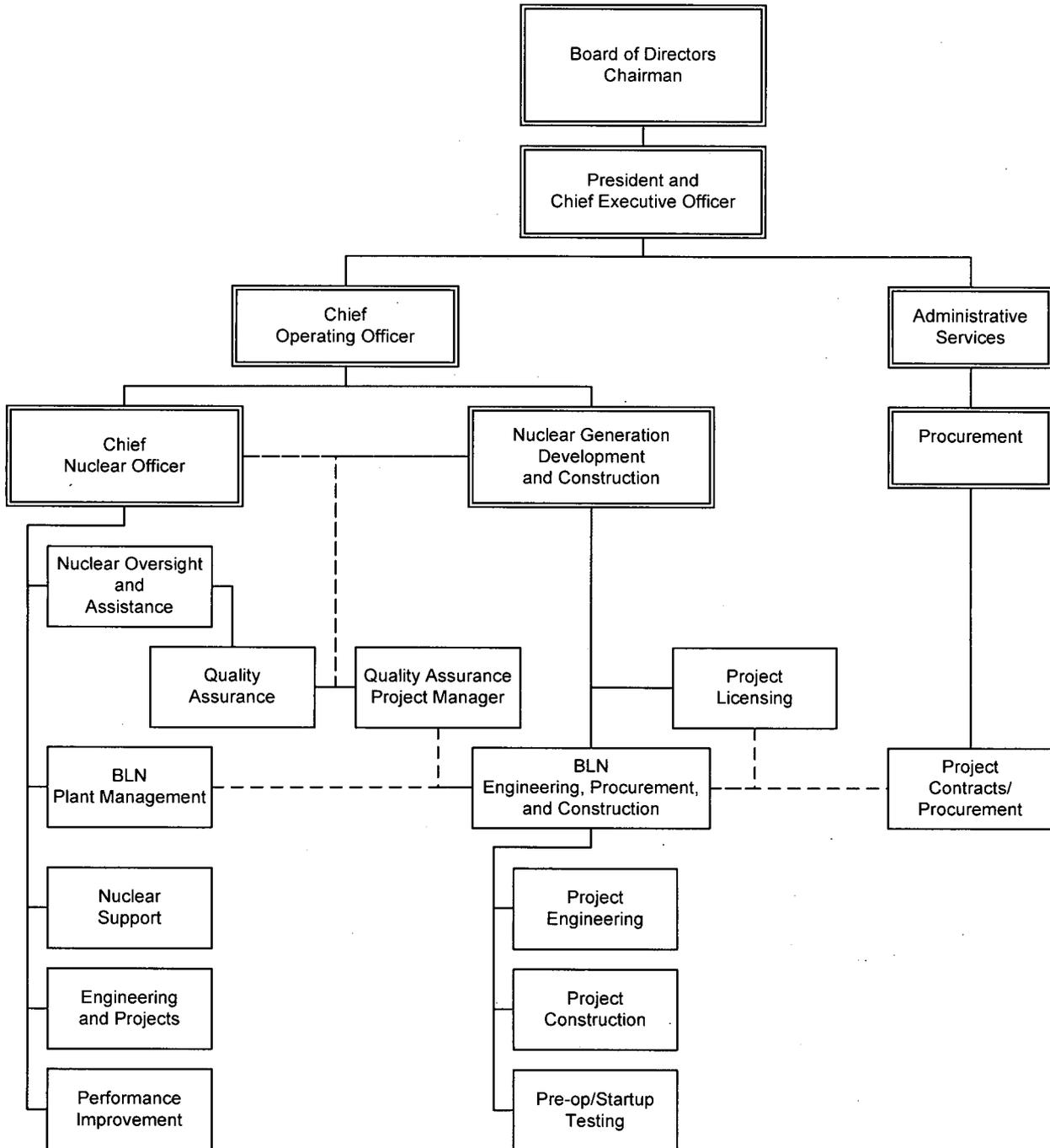
To read:

- e. Reviews any matter related to nuclear safety that is requested by the CNO, BLN Plant Management executive, or any IRC member.

c. Insert the following functional organization charts as APPENDIX A:

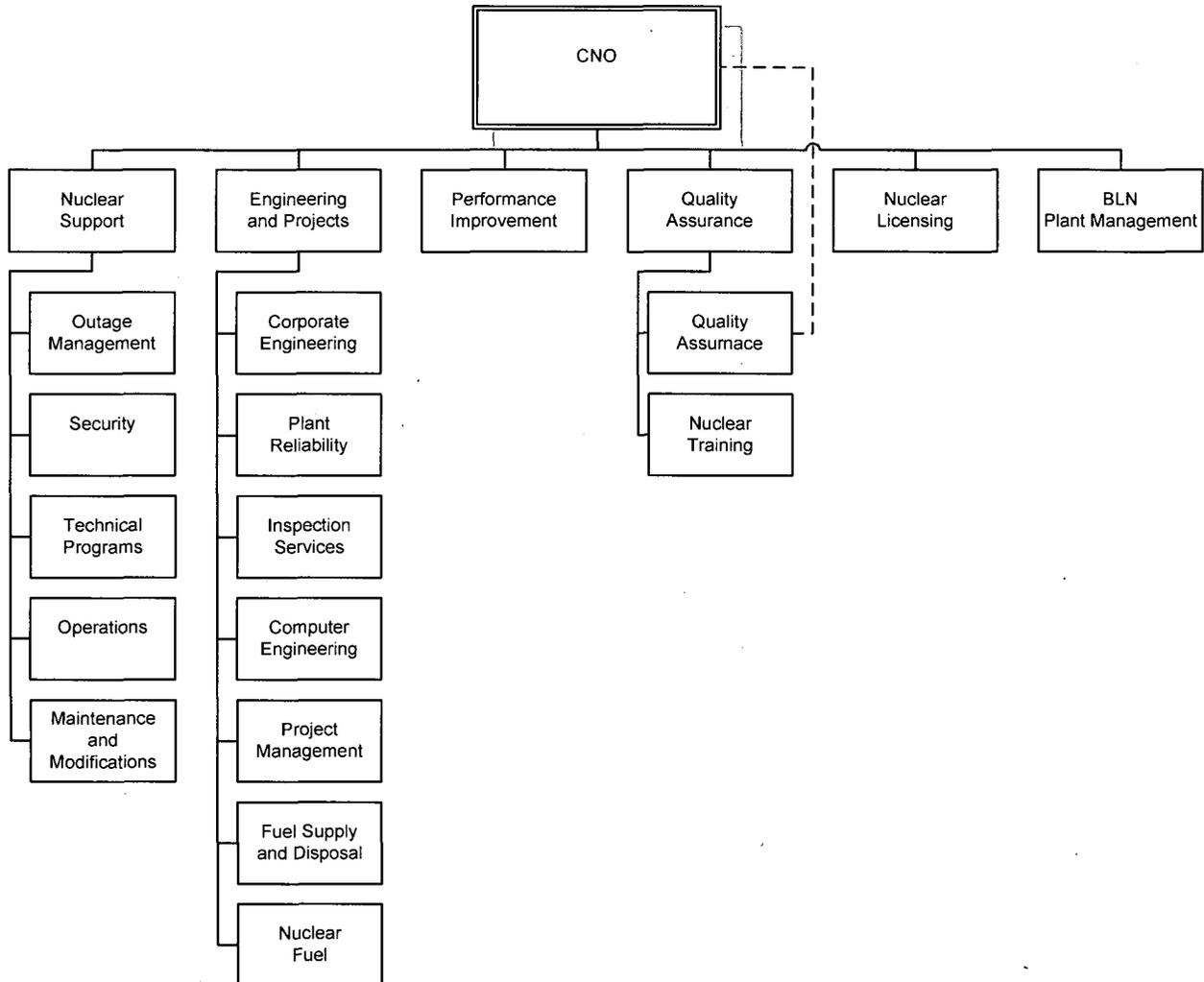
APPENDIX A
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TVA QAPD
 FUNCTIONAL ORGANIZATION



APPENDIX A
Page 2 of 2

TVA QAPD
FUNCTIONAL ORGANIZATION



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3. COLA Part 2, FSAR Chapter 13 will be revised as follows:

a. Add new **Section 13.1.1.3.1.6 (a)**

Site Executive in Charge of Engineering, Procurement, and Construction

The site executive in charge of engineering, procurement, and construction (EPC) reports to the executive in charge of nuclear generation development and construction. The site executive in charge of EPC is directly responsible for project engineering, procurement, and construction, including pre-operational and startup testing and operational development activities provided by TVA and EPC contractors. Responsibility for reliable and efficient plant operations transitions from this position to the executive in charge of plant management beginning at fuel load.

- b. Change Section 13.1.1.3.1.6 number to 13.1.1.3.1.6 (b) Site Executive in Charge of Plant Management
- c. FIGURE 13AA-201, Construction Management Organization - change title in organization box currently labeled "Site Executive Plant Management" to "Site Executive Engineering, Procurement, and Construction"
- d. FIGURE 13.1-203, Corporate and Engineering Organization - remove the dotted line between the organization box titled "Executive, Nuclear Generation Development, & Construction" and organization box titled "BLN Site Executive, Plant Management"
- e. FIGURE 13.1-203, Corporate and Engineering Organization - add an organization box titled "BLN Site Executive, Engineering, Procurement, and Construction" with hard line reporting to the organization box titled "Executive, Nuclear Generation Development & Construction", and a dotted line relationship with the organization box titled "BLN Site Executive, Plant Management".

ATTACHMENTS/ENCLOSURES:

None

Enclosure
TVA letter dated June 26, 2008
RAI Responses

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-04

Section 17.5 of the Bellefonte FSAR states, in part, that the QAPD is based on NEI 06-14A, "Quality Assurance Program Description," Revision 4, which was approved by the NRC. Section 17.5 also states that the QAPD is maintained as a separate document. Part II, Section 1 of the Bellefonte QAPD states, in part, that the organization charts for the various departments/locations are contained in chapter 13 of the respective station's FSARs and will describe organizational positions and specific functions and responsibilities. Please clarify how the organizational charts provided in Chapter 13 of the Bellefonte FSAR describe the specific functions and responsibilities, as well as how these organizational charts are consistent with the organization described in the QAPD. Because referencing information outside of the QAPD is not consistent with the NRC-approved NEI 06-14A and the NRC Standard Review Plan Section 17.5, which incorporates the requirements of American National Standard Institute N18.7, and 10 CFR 50.54(a)(3)(iv) allows the use of generic organizational charts to describe functional relationships, authorities, and responsibilities, please revise the QAPD to include the organization charts for the construction/pre-operations organization and the operations organization.

BLN RAI ID: 342

BLN RESPONSE:

See response to NRC RAI NUMBER 17.05-03. More detailed organization charts for various departments/locations are contained in Chapter 13 of the BLN 3&4 Final Safety Analysis Report which describes organizational positions and specific functions and responsibilities. The TVA response to NRC RAI NUMBER 17.05-03 altered the FSAR Chapter 13 charts to insert a position, BLN Site Executive, Engineering, Procurement, and Construction, which had not been included on FIGURE 13.1-203 and had been mislabeled on FIGURE 13AA-201. However, inclusion of APPENDIX A to the QAPD to identify a high level functional organization for implementation of the QAPD provides sufficient information to assure QA requirements are identified and implemented.

This response is PLANT SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

None

ATTACHMENTS/ENCLOSURES:

None

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TVA letter dated June 26, 2008
RAI Responses

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-05

The Bellefonte QAPD, Part II, Section 2.5, Issuance and Revision to Quality Assurance Program, states, in part, that 10 CFR 50.34(b)(6)(ii) requires that the FSAR include the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. The NRC staff notes that because 10 CFR Part 52 was revised in August 2007, the correct citation for Part 52 applicants is now 10 CFR 52.79(a)(27) and not 50.34(b)(6)(ii). Please revise section 2.5 of the Bellefonte QAPD to provide the correct citation.

BLN RAI ID: 343

BLN RESPONSE:

This section of the QAPD is standard text from NEI 06-14A. In reviewing the condition identified by this RAI, NEI determined that while the citation could be changed to 10 CFR 52.79(a)(27), it could also be correct to include a citation to 10 CFR 52.79(a)(25) for design and construction as well as a citation to 52.17 for Early Site Permits. Rather than add more citations for the same basic requirement, NEI has revised the text in NEI 06-14A and resubmitted that document. This revised standard text will be incorporated into the QAPD as shown in the Application Revisions below.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 11, QAPD, Part II, Section 2.5, second paragraph, will be revised from:

10 CFR 50.34(b)(6)(ii) requires that the Final Safety Analysis Report (FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. In order to comply with this requirement, the FSAR references this QAPD and, as a result, the requirements of 10 CFR 50.54(a) are satisfied by and apply to the QAPD.

To read:

Regulations require that the Final Safety Analysis Report (FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied. In order to comply with this requirement, the FSAR references this QAPD and, as a result, the requirements of 10 CFR 50.54(a), are satisfied by and apply to the QAPD.

ATTACHMENTS/ENCLOSURES:

None

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NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-06

The Bellefonte QAPD, Part II, Section 2.7 describes the Independent Review Committee (IRC). Item 6 on page 13 of the QAPD states "the Independent Review committee is responsible for performing the following:" and lists several items. The responsibilities of the IRC are defined in ANSI N18.7 and are provided on Pages 17.5-43 and 17.5-44 (items a through g) of SRP 17.5. Please explain how the QAPD discussion is consistent with the responsibilities for the IRC as defined in ANSI N18.7.

BLN RAI ID: 344

BLN RESPONSE:

This section of the QAPD is standard text from NEI 06-14A. The QAPD is consistent with the SRP 17.5 and ANSI N18.7 because the referenced items a through g are included in Part II, Section 2.7 following the first paragraph of that section.

Standard Review Plan 17.5, Section II, Acceptance Criteria W, Independent Review, provides two acceptable options for implementation of the independent review requirements. Option I item 2 includes responsibilities listed as items a through g, which are the same as those listed under Option II item 6. NEI moved those requirements common to both Options to be listed as items a through g following the first paragraph of Section 2.7. Unfortunately, under Option II Independent Review Committee, item 6 was retained without the list. NEI has corrected this error with NEI 06-14A Revision 5, submitted to the NRC on May 7, 2008. This revised standard text will be incorporated into the QAPD as shown in the Application Revisions below.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 11, QAPD, Part II, Section 2.7, will be revised (to remove item 6) from:

5. Results of the meeting are documented and be recorded.
6. The Independent Review committee is responsible for performing the following:
7. Consultants and contractors are used for the review of complex problems beyond the expertise of the off site/on site independent review committee.
8. Persons on the independent review committee are qualified as follows:"

To read

5. Results of the meeting are documented and be recorded.
6. Consultants and contractors are used for the review of complex problems beyond the expertise of the off site/on site independent review committee.
7. Persons on the independent review committee are qualified as follows:"

ATTACHMENTS/ENCLOSURES:

None

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NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-07

The Bellefonte QAPD, Part II, Section 4, Procurement Document Control, states, in part, that procurement documents shall require suppliers to have a documented QA program that is determined to meet the applicable requirements of Appendix B, as appropriate to the circumstances of procurements (or the supplier may work under the "licensees" approved QA program). Please explain whether it would be appropriate to substitute "TVA's" for "licensee's" to make it clear that a supplier may work under TVA's approved QA program.

BLN RAI ID: 345

BLN RESPONSE:

This section of the QAPD is standard text from NEI 06-14A.

The name of the COL applicant could be substituted for "licensee" in this location without changing the meaning. However, the use of the word licensee is also correct in this sentence. Since the context is clearly understood in this standard text, a change to the QAPD is not considered necessary.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

No COLA revisions have been identified associated with this response.

ATTACHMENTS/ENCLOSURES:

None

Enclosure
TVA letter dated June 26, 2008
RAI Responses

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-08

In the Bellefonte QAPD, Part II, Section 10.1, NQA-1-1994 Commitment / Exceptions, the third bullet is still shown in brackets, as used in the NEI 06-14A template, indicating that the provision is optional. Explain whether TVA intends to implement the alternative described in the third bullet on page 30 of the QAPD. Similar brackets are also present in the first paragraph of Part II, Section 11, Test Control. Explain whether TVA intends to implement the wording in brackets on page 31 of the QAPD.

BLN RAI ID: 346

BLN RESPONSE:

During the preparation of the plant specific QAPD, the brackets were inadvertently left in the document in these locations. The text enclosed in the brackets in these two locations is intended to be implemented. In Section 10.1, the brackets will be removed and the text revised as shown in the Application Revisions section below. In Section 11, the brackets will be removed without any text changes as shown in the Application Revisions section below. An additional inadvertent bracket is removed from the end of Section 6, bulleted item j.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 11, QAPD, Part II, Section 10.1, will be revised from:

- [Optional alternative for those sites where the reporting independence of NQA-1-1994, Supplement 10S-1, Section 3.1 may not be met. Where inspections at the operating facility are performed by persons within the same organization (e.g. Maintenance group), TVA takes exception to the requirements of NQA-1-1994, Supplement 10S-1, Section 3.1, the inspectors report to the [quality control management] while performing those inspections.]

To read:

- Where inspections at the operating facility are performed by persons within the same organization (e.g. Maintenance group), TVA takes exception to the requirements of NQA-1-1994, Supplement 10S-1, Section 3.1; the inspectors report to the quality control management while performing those inspections.

2. COLA Part 11, QAPD, Part II, Section 11, first paragraph, will be revised as shown:

TVA has established the necessary measures and governing procedures to demonstrate that items subject to the provisions of this QAPD will perform satisfactorily in service, that the plant can be operated safely and as designed, and that the coordinated operation of the plant as a whole is satisfactory. These programs include criteria for determining when testing is required, such as [proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, in-service tests, and operational tests (such as surveillance tests required by

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Plant Technical Specifications)], to demonstrate that performance of plant systems is in accordance with design.

To read:

TVA has established the necessary measures and governing procedures to demonstrate that items subject to the provisions of this QAPD will perform satisfactorily in service, that the plant can be operated safely and as designed, and that the coordinated operation of the plant as a whole is satisfactory. These programs include criteria for determining when testing is required, such as proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, in-service tests, and operational tests (such as surveillance tests required by Plant Technical Specifications), to demonstrate that performance of plant systems is in accordance with design.

COLA Part 11, QAPD, Part II, Section 6, bullet j, will be revised from:

(j) nonconformance reports and corrective action reports]

To read:

(j) nonconformance reports and corrective action reports.

ATTACHMENTS/ENCLOSURES:

None

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NRC RAI NUMBER: 17.05-09

Appendix B to 10 CFR Part 50 states, in part, that every applicant for a combined license under 10 CFR Part 52 is required by the provisions of 10 CFR 52.79 to include in its FSAR a description of the quality assurance applied to the design, and to be applied to the fabrication, construction, and testing of SSCs of the facility and to the managerial and administrative controls to be used to assure safe operation. Section 17.5 of the Bellefonte FSAR states, in part, that the QA program in place during the design, construction, and operations phases is described in the QAPD, which is maintained as a separate document. Pursuant to Appendix B, please explain why the QAPD provided in Part 11 of the Bellefonte application is not referenced or incorporated by reference in the Bellefonte FSAR.

BLN RAI ID: 347

BLN RESPONSE:

The first paragraph of FSAR Section 17.5 is revised as shown in the Application Revisions section below to incorporate the QAPD by reference.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 2, FSAR, Section 17.5, first paragraph, will be revised from:

The Quality Assurance Program in place during the design, construction, and operations phases is described in the QAPD, which is maintained as a separate document. The QAPD is based on NEI 06-14, "Quality Assurance Program Description," which was approved by the NRC in Reference 203.

To read:

The Quality Assurance Program in place during the design, construction, and operations phases is described in the QAPD, which is maintained as a separate document. The QAPD is incorporated by reference. This QAPD is based on NEI 06-14, "Quality Assurance Program Description," which was approved by the NRC in Reference 203.

ATTACHMENTS/ENCLOSURES:

None