



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

July 03, 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 – CODE COMPLIANCE**

Reference: Letter from Joseph M. Sebrosky (NRC) to Andrea L. Sterdis (TVA),
Request for Additional Information Letter No. 024 Related to SRP Section
05.02.01 for the Bellefonte Units 3 and 4 Combined License Application,
dated May 22, 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 3rd day of July, 2008.


Jack A. Bailey
Nuclear Generation Development

Enclosure
cc: See Page 2

DOES
NRO

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cc: (Enclosure)

- J. P. Berger, EDF
- J. M. Sebrosky, NRC/HQ
- E. Cummins, Westinghouse
- S. P. Frantz, Morgan Lewis
- M. W. Gettler, FP&L
- R. Grumbir, NuStart
- P. S. Hastings, NuStart
- P. Hinnenkamp, Entergy
- M. C. Kray, NuStart
- D. Lindgren, Westinghouse
- G. D. Miller, PG&N
- M. C. Nolan, Duke Energy
- N. T. Simms, Duke Energy
- G. A. Zinke, NuStart

cc: (w/o Enclosure)

- B. C. Anderson, NRC/HQ
- M. M. Comar, NRC/HQ
- B. Hughes/NRC/HQ
- R. G. Joshi, NRC/HQ
- R. H. Kitchen, PGN
- M. C. Kray, NuStart
- A. M. Monroe, SCE&G
- C. R. Pierce, SNC
- R. Reister, DOE/PM
- L. Reyes, NRC/RII
- T. Simms, NRC/HQ

Enclosure
TVA letter dated July 03 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 024 dated May 22,
2008

(3 pages, including this list)

Subject: Quality Assurance

<u>RAI Number</u>	<u>Date of TVA Response</u>
05.02.01.01-01	This letter – see following pages

Attachments / Enclosures
Included

Pages

None

Enclosure
TVA letter dated July 03 2008
RAI Responses

NRC Letter Dated: May 22, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 05.02.01.01-01

AP1000 DCD Section 5.2.6.1 states, "The Combined License applicant will address consistency of the design with the construction practices (including inspection and examination methods) of the later ASME Code edition and addenda added as part of the Combined License application. The Combined License applicant will address the addition of ASME code cases approved subsequent to design certification." ASME Code Section III, NCA-1140, "Use of Code Editions, Addenda, and Cases," provides criteria applicable to design and construction activities. It states that specific provisions within an Edition or Addenda later than those established in the design specifications may be used, provided that all the related requirements are met. Discuss whether the methodology discussed under STD COL 5.2-1, including supplemental information (Bellefonte FSAR section 5.2.1.1), is applicable or appropriate for ASME Section III design/construction activities. Clarify whether TVA intends to use portions of ASME Code, Section III Editions and Addenda approved subsequent to those specified in the certified AP1000 design and, if so, address how TVA will ensure consistency of the design and construction practices when using such later Section III Code Editions and Addenda. Please revise STD COL 5.2-1 of TVA's supplemental information (following the second sentence in the second paragraph of DCD Subsection 5.2.1.1) to ensure consistency with the criteria in the ASME Code Section III, paragraph NCA-1140, "Use of Code Editions, Addenda, and Cases."

BLN RAI ID: 0390

BLN RESPONSE:

The provisions in DCD Subsections 5.1.2.2 and 5.2.6.1 and FSAR Subsection 5.2.1.1 provide a means to use but do not require use of an updated Edition and Addenda of the ASME Code, Section III. ASME Code, Section III components are being designed using the baseline ASME Code defined in DCD Subsection 5.2.1.1. Design specifications for component and material procurement will specify the ASME Code to be used for design and construction to be that identified in the DCD. There is no intent to specify portions of ASME Code, Section III Editions and Addenda, approved subsequent to those identified in the certified AP1000 design. In addition, the reference in the FSAR Subsection 5.2.1.1 to the ASME Section XI reconciliation process for repair and replacement is an inappropriate reference for the original design and construction. Therefore, this reference will be corrected as identified in the Applications Revisions section below to reference ASME Section III criteria for evaluations of differences in ASME Code edition/addenda that may be used in design and construction activities, for example by material or component suppliers.

Additionally, we understand that an ASME Code Case is being prepared to address the inconsistency between the rules in the ASME Code Section III, paragraph NCA-1140 and the Design Certification. The new code case, if approved, would also be adopted for addressing use of later code editions and addenda.

Enclosure
TVA letter dated July 03 2008
RAI Responses

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

Enclosure
TVA letter dated July 03 2008
RAI Responses

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 2, FSAR Chapter 5, Section 5.2.1.1, will be revised from:

If a later Code year/addenda than the Design Certification Code year/addenda is used by the material and/or component supplier, then a code reconciliation is performed. The reconciliation is performed using the methodology set forth in ASME Section XI for the repair and replacement of components.

To read:

If a later Code edition/addenda than the Design Certification Code edition/addenda is used by the material and/or component supplier, then a code reconciliation to determine acceptability is performed as required by the ASME Code, Section III, NCA-1140.

ATTACHMENTS/ENCLOSURES:

None