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

July 23, 2008

10 CFR 52.79

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

In the Matter of) Docket No. 52-014 and 52-015
Tennessee Valley Authority)

BELLEFONTE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION – CONTAINMENT LEAK TESTING PROGRAM

Reference: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 047 Related to SRP Section 06.02.06 for the Bellefonte Units 3 and 4 Combined License Application, dated June 20, 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 23rd day of July, 2008.

Jack A. Bailey

Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure
cc: See Page 2

A017
D085
NRO

cc: (Enclosures)
J. P. Berger, EDF
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
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. 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
J. M. Sebrosky, NRC/HQ

Enclosure
TVA letter dated July 23, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 047 dated June 20, 2008
(3 pages, including this list)

Subject: Containment Leak Testing Program in the Final Safety Analysis Report

RAI Number	Date of TVA Response
06.02.06-01	This letter – see following pages

Attachments / Enclosures	Pages Included
None	

Enclosure
TVA letter dated July 23, 2008
RAI Responses

NRC Letter Dated: June 20, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 06.02.06-01

The following NRC and Bellefonte documents provide test implementation milestones for Types A, B, and C Containment Leakage Rate Testing:

• The USNRC Standard Review Plan (NUREG-0800) Section 13.4, Revision 3 (March 2007), Sample FSAR Table 13.4–x, Item 7 states that the Containment Leakage Rate Testing Program will have an implementation milestone of Fuel Load (License Condition).

• Approved Technical Report AP-TR-NS01-A, Revision 2, states that the Containment Leakage Rate Testing Program will be implemented prior to fuel load.

• The Bellefonte FSAR Section 6.2.5.2.2 states that a Type A Test and the Containment Airlocks Type B Tests will be conducted prior to initial fuel load. However, section 6.2.5.2.2 states that Type B Tests (except Containment Airlocks) and Type C Tests are performed prior to initial entry into Mode 4.

• The Bellefonte COL Application, Part 10, Proposed License Condition I.1 states that the Containment Leakage Rate Testing Program will be implemented prior to Mode 4 operation.

• The Bellefonte FSAR Table 13.4-201, Item 7 states that the Containment Leakage Rate Testing Program will be implemented prior to Mode 4 (License Condition).

Please resolve these apparent discrepancies.

BLN RAI ID: 0571

BLN RESPONSE:

The items were intended to reflect the difference between "implementation of the program" (which is, in effect, the approval of any applicable program documents and associated necessary procedures) and the actual requirements for the performance of the tests. However, as noted, this intent is not consistently reflected. Therefore, the above cited COLA references will be revised to consistently reflect an implementation of the program "prior to fuel load" with the understanding that the tests will be performed on a schedule consistent with the requirements of 10 CFR Part 50, Appendix J, and the Technical Specifications. Note that the identified FSAR Subsection 6.2.5.2.2 discusses the actual schedule for performance of the tests, which is consistent with the requirements of 10 CFR Part 50, Appendix J, the Technical Specifications, and with implementation of the program prior to fuel load. Thus, no change to this FSAR subsection is proposed.

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

Enclosure
TVA letter dated July 23, 2008
RAI Responses

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 2, FSAR Chapter 13, Table 13.4-201, Item 7 Milestone column entry, will be revised from:

Prior to Mode 4

To read:

Prior to initial fuel load

2. COLA Part 10, Proposed License Condition 3, Operational Program Implementation, item G, will be revised to add new sub-item G.8 (Note that new item G.7 was previously added by Errata Report Rev. 1, item AP-STD-105), which reads:

G.8 – Containment Leakage Rate Testing Program

3. COLA Part 10, Proposed License Condition 3, Operational Program Implementation, item I, will be revised from:

I. MODE 4 – The licensee shall implement each operational program identified below prior to Mode 4 operation.
I.1 – Containment Leakage Rate Testing Program

To read:

I. MODE 4 – Not used.

ATTACHMENTS/ENCLOSURES:

None