



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

August 1, 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 PROGRAM – COMBUSTIBLE
CONTROL**

Reference: Letter from Tanya Simms (NRC) to Andrea Sterdis (TVA), Request for
Additional Information Letter No. 054 Related to SRP Section 09.05.01 for the
Bellefonte Units 3 and 4 Combined License Application, dated June 30, 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 the NRC request in the subject letter is addressed in the enclosure which does not
identify any associated changes to be made in a future revision of the BLN application.

If you should have any questions, please contact Tom Spink at 1101 Market Street, LP5A,
Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7062, or via email at
tespink@tva.gov.

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

Executed on this 1st day of AUG, 2008.

Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure
cc: See Page 2

DOBS
MRO

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cc: (Enclosures)

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J. M. Sebrosky, NRC/HQ

Response to NRC Request for Additional Information letter No. 054 dated June 30, 2008
(3 pages, including this list)

Subject: Fire Protection Program in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
09.05.01-09	This letter – see following pages

<u>Attachments / Enclosures</u>	<u>Pages Included</u>
None	

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NRC Letter Dated: June30, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 09.05.01-09

RG 1.206, Regulatory Position C.III.1, Section C.I.9.5.1.1 identifies that the COL applicant should provide information on the fire protection operational program including the combustible control program. Bellefonte took exceptions to RG 1.189, Regulatory Position 6.2.1 guidance to provide automatic suppression in the control room complex, and rated 1-hour fire barriers between the main control area and the tagging room. One basis for these exceptions is that most paper combustible materials in these rooms are stored in metal filing cabinets, desks, or bookcases. Since piles of paper on desktops, paper in open bookcases, as well as other transient combustibles and potential ignition sources (e.g., coffee makers) contribute to the overall fire hazards in these rooms, describe the applicant's program to maintain the control room complex as a light hazard fire area.

BLN RAI ID: 0622

BLN RESPONSE:

As indicated in FSAR, Appendix 1AA, BLN's Fire Protection Program conforms to RG 1.189. Automatic suppression and rated 1-hour fire barriers are design related issues addressed by the DCD. The control room design is described in DCD Chapter 9, Subsection 9.A.3.1.2.5.1 as Fire Area 1242AF01. The fire area is subdivided into the following fire zones:

<u>Fire Zone</u>	<u>Room No.</u>	<u>Description</u>
1242 AF 12401A	12401	Main control area/tagging room/vestibule
1242 AF 12401B	12401	Shift supervisor/clerk/operator area

The Main Control Room area/tagging room vestibule is considered one room since the walls of the tagging room do not go all the way to the ceiling. The DCD addresses the fire concerns in the control room and tagging area and, as stated, most of the paper in the tagging room and the control room is contained within metal filing cabinets, desks, or bookcases. This is a light hazard fire area per the DCD and the rate of fire growth is expected to be slow. The fire area is continuously manned and prompt manual fire suppression is expected. In addition, DCD Appendix 9A lists fire detection systems and suppression features available to detect or suppress a fire in these areas, including fire detectors in the general area and subfloor area, hose stations, and portable fire extinguishers. Smoke removal is provided by the nonradioactive ventilation system. Breathing apparatuses are provided for control room personnel. These provisions are in accordance with BTP CMEB 9.5-1.

A housekeeping program is provided in order to maintain cleanliness and minimal fire hazard in the control room and other areas of the plant. COLA Part 11, Section 13.1, Quality Assurance Program Description (QAPD) addresses programmatic practices for housekeeping. The QAPD states "Housekeeping practices are established to account for conditions or environments that could affect the quality of structures, systems and components within the plant. This includes control of cleanness of facilities and material, fire prevention and protection, disposal of combustible material and debris, control of access to work areas, protection of equipment,

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radioactive contamination control and storage of solid radioactive waste.” Additionally the QAPD states that necessary procedures are developed and used.

Design features, housekeeping, fire detection, manual fire suppression, continuous manning of the control room and conformance to operational and programmatic aspects of RG 1.189 ensure the control room complex is maintained as a light hazard fire area

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