



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

August 19, 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

**BELLEVILLE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR  
ADDITIONAL INFORMATION – REGULATORY GUIDE CONFORMANCE**

Reference: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for  
Additional Information Letter No. 066 Related to SRP Section 01 for the  
Belleville Units 3 and 4 Combined License Application, dated July 7, 2008

This letter provides the Tennessee Valley Authority's (TVA) responses 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 also  
identifies associated changes that will be made in a future revision of the BLN application.

If you should have any questions, please contact Thomas 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 19<sup>th</sup> day of Aug, 2008.

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

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cc: See Page 2



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Date August 19, 2008

cc: (w/Enclosure)

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. . Monroe, SCE&G  
C. R. Pierce, SNC  
R. Reister, DOE/PM  
L. Reyes, NRC/RII  
T. Simms, NRC/HQ  
K. N. Slays, NuStart  
J. M. Sebrosky, NRC/HQ

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Response to NRC Request for Additional Information letter No. 066 dated July 7, 2008  
(10 pages, including this list)

Subject: Regulatory Guide Conformance in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
01-05	This letter – see following pages

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

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**NRC Letter Dated: July 7, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 01-05**

Westinghouse DCD Appendix 1A provides an evaluation of the degree of AP1000 compliance with NRC Division 1 Regulatory Guides. Westinghouse DCD Table 1.9-1 identifies the appropriate DCD cross reference for those regulatory guides applicable to AP1000.

Bellefonte FSAR Section 1.9.1.1, "Division 1 Regulatory Guides-Power Reactors", states in part, "Appendix 1AA provides an evaluation of the degree of compliance with Division 1 regulatory guides as applicable to content of this FSAR, or to the site-specific design, construction and/or operational aspects." Section 1.9.1.1 also states that Table 1.9-201 identifies the appropriate regulatory guide to FSAR cross-reference and the cross-referenced sections contain descriptive information applicable to the regulatory guide positions found in Appendix 1AA. Bellefonte Appendix 1AA supplements the information in DCD Appendix 1A.

Based on the above, for Bellefonte, compliance with Regulatory Guides consists of Westinghouse DCD Appendix 1A and Bellefonte Section 1.9.1.1 and Appendix 1AA.

The result of our review of the above documents is provided below:

1. Appendix 1AA lists the later version of the Regulatory Guides when compared with the DCD Table 1.9-1 {e.g., Reg. Guide 1.7, 1.13, 1.20, 1.26, 1.29, 1.97 (Table 1.9-201 lists Revision 4 for Regulatory Guide 1.97 and cross references to Appendix 12AA of the FSAR (NEI-07-03). NEI-07-03 in Section 12.5.3 states in part that the types and characteristic of instrumentation are consistent with guidance in Regulatory Guide 1.97. NEI-07-03 references Revision 4 of Regulatory Guide 1.97 but Appendix 1AA discusses Rev. 3)} but does not discuss compliance with the later version. Instead, a statement is provided to indicate that conformance with the earlier revision is documented in the DCD. There is no explanation or justification in Appendix 1AA to indicate why the latest version of the Regulatory Guide is not applicable or not within the scope of the COLA. Please clarify the apparent discrepancy between compliance discussions for different revisions of Regulatory Guides.
2. Bellefonte FSAR Section 1.9.1.1 states in part that any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided (reference Appendix 1AA). However, for certain Regulatory Guides exception is provided but not justified. (e. g., R.G. 1.21, Position C.6, provides an exception and states that ANSI N13.1-199 is used. Provide a justification why the specific ANSI standard is an alternative method to meet the specific regulatory Position 0 (other examples are R.G. 1.152, R. G. 8.6).

Please note that additional questions may be forthcoming relevant to the technical and/or regulatory adequacy of this part of the application as the technical staff completes its reviews in the various chapters.

**BLN RAI ID: 0629**

**BLN RESPONSE:**

1. As indicated in the question, the FSAR Appendix 1AA lists the later version of the Regulatory Guides when compared with the DCD Table 1.9-1 but (in some cases) does not discuss compliance with the later version. In the cases where the later version is not discussed, the intent was that the later revision was not considered relevant because the specific Regulatory Guide was considered to be only design related information which was completely addressed in the DCD, thus the statement that

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“conformance with the earlier revision is documented in the DCD” was intended to fully address the guidance. However, an additional statement that specifically addresses the later revision of the Regulatory Guide in Appendix 1AA would provide further clarification. Thus, FSAR Subsection 1.9.1.1 and FSAR Appendix 1AA will be revised to provide this additional clarification as shown in the Application Revisions section below. In addition, each Regulatory Guide was reviewed to determine if any programmatic and/or operational aspects may have been overlooked. FSAR Appendix 1AA will also be revised to provide positions on any programmatic and/or operational aspects identified by this review.

2. As indicated the FSAR Appendix 1AA, for certain Regulatory Guides exception is provided but not justified. The Regulatory Guides with exceptions have been reviewed and justification is provided for each where it might have been missing (as shown in the Application Revisions section below).

Associated conforming changes to FSAR Table 1.9-201 will be addressed in the response to NRC RAI Number 01-07.

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

#### **ASSOCIATED BLN COL APPLICATION REVISIONS:**

1. COLA Part 2, FSAR, Chapter 1, Subsection 1.9.1.1 will be revised to supplement the third sentence from:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided.

To read:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided. One such general alternative is the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD in order to preserve the finality of the certified design. Stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects.

2. COLA Part 2, FSAR, Chapter 1, Subsection 1.9.1.2 will be revised to supplement the fourth sentence from:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided.

To read:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided. One such general alternative is the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD in order to preserve the finality of the certified design. Stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects.

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3. COLA Part 2, FSAR, Chapter 1, Subsection 1.9.1.3 will be revised to supplement the fourth sentence from:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided.

To read:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided. One such general alternative is the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD in order to preserve the finality of the certified design. Stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects.

4. COLA Part 2, FSAR, Chapter 1, Subsection 1.9.1.4 will be revised to supplement the third sentence from:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided.

To read:

Any exceptions or alternatives to the provisions of the regulatory guides are identified and justification is provided. One such general alternative is the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD in order to preserve the finality of the certified design. Stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects.

5. COLA Part 2, FSAR, Chapter 1, Appendix 1AA will be revised to remove the conformance statement for Regulatory Guide 1.161 Rev. 0. As indicated in the DCD, this guidance is not applicable to the AP1000 design and the following will be deleted.

**Regulatory Guide 1.161, Rev. 0, 6/95 – Evaluation of Reactor Pressure Vessels with Charpy Upper-Shelf Energy Less Than 50 Ft-Lb.**

Conformance with the design aspects is as stated in the DCD. Conformance with Revision 0 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

6. COLA Part 2, FSAR, Chapter 1, Appendix 1AA will be revised from the current wording to include the new or revised Regulatory Guide conformance statements shown below (Note that this listing is not a complete replacement of Appendix 1AA and that some previously identified errata items have also been incorporated.):

**Regulatory Guide 1.7, Rev. 3, 3/07 – Control of Combustible Gas Concentrations in Containment**

Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.2 Conforms

C.4 Conforms

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**Regulatory Guide 1.12, Rev. 2, 3/97 – Nuclear Power Plant Instrumentation for Earthquakes**

Conformance of the design aspects is as stated in the DCD. Conformance for programmatic and/or operational aspects is documented below.

C.3 Conforms

C.8 Conforms

**Regulatory Guide 1.13, Rev. 2, 3/07 – Spent Fuel Storage Facility Design Basis**

Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.7 Conforms

**Regulatory Guide 1.20, Rev. 3, 3/07 – Comprehensive Vibration Assessment Program For Reactor Internals During Preoperational and Initial Startup Testing**

Conformance with Revision 2 of this Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.26, Rev. 4, 3/07 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants**

Conformance with Revision 3 of this Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.

General Conforms

**Regulatory Guide 1.28, Rev. 3, 8/85 – Quality Assurance Program Requirements (Design and Construction)**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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**Regulatory Guide 1.29, Rev. 4, 3/07 – Seismic Design Classification**

Conformance with Revision 3 of this Regulatory Guide for DCD scope of work is as stated in the DCD. Conformance with Revision 4 of this Regulatory Guide for remaining scope is documented below.

C.4 Conforms

**Regulatory Guide 1.30, Rev. 0, 8/72 – Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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**Regulatory Guide 1.32, Rev. 3, 3/04 – Criteria for Power Systems for Nuclear Power Plants**

Conformance of the design aspects with Revision 2 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

**Regulatory Guide 1.33, Rev. 2, 2/78 – Quality Assurance Program Requirements (Operation)**

General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.

**Regulatory Guide 1.37, Rev. 1, 3/07 – Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water Cooled Nuclear Power Plants**

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General Conforms

**Regulatory Guide 1.38, Rev. 2, 5/77 – Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.

**Regulatory Guide 1.39, Rev. 2, 9/77 – Housekeeping Requirements for Water-Cooled Nuclear Power Plants**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General Exception Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.

**Regulatory Guide 1.45, Rev. 0, 5/73 - Reactor Coolant Pressure Boundary Leakage Detection Systems**

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

C.7 Conforms

**Regulatory Guide 1.53, Rev. 2, 11/03 - Application of the Single-Failure Criterion to Nuclear Power Plant Protection Systems**

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

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**Regulatory Guide 1.54, Rev. 1, 7/00 – Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants**

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General Conforms

**Regulatory Guide 1.57, Rev. 1, 3/07 – Design Limits and Loading Combinations for Metal Primary Reactor Containment System Components**

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.61, Rev. 1, 3/07 – Damping Values for Seismic Design of Nuclear Power Plants**

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.65, Rev. 0, 10/73 - Materials and Inspections for Reactor Vessel Closure Studs**

Conformance of the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

C.3 Conforms

C.4 Exception ASME XI ISI criteria for reactor vessel closure stud examinations are applied in lieu of the ASME III NB-2545 and NB-2546 surface examinations. The volumetric examinations currently required by ASME XI provide improved (since 1973) detection of bolting degradation.

**Regulatory Guide 1.71, Rev. 1, 3/07 – Welder Qualification for Areas of Limited Accessibility**

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of the Regulatory Guide during the operational phase (i.e., after the construction phase is completed per the DCD) is documented below.

General Conforms

**Regulatory Guide 1.75, Rev. 3, 2/05 – Criteria for Independence of Electric Safety Systems**

Conformance with Revision 2 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.76, Rev. 1, 3/07 – Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants**

Conformance with Revision 0 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.78, Rev. 1, 12/01 – Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release**

Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General Conforms

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**Regulatory Guide 1.82, Rev. 3, 11/03 – Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident**

Conformance of the design aspects with Revision 2 of this Regulatory Guide is as stated in the DCD. Conformance with Revision 3 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

C.1.1.2 Conforms

C.1.1.5 Conforms

**Regulatory Guide 1.83, Rev. 1, 7/75 – Inservice Inspection of Pressurized Water Reactor Steam Generator Tubes**

Conformance of the design aspects is as stated in the DCD. Conformance of the programmatic and/or operational aspects is documented below.

General	Exception	Steam generator tube surveillance is in accordance with Nuclear Energy Institute (NEI) 97-06. This guidance has been endorsed by NRC as an acceptable program basis.
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**Regulatory Guide 1.84, Rev. 33, 8/05 – Design, Fabrication, and Materials Code Case Acceptability, ASME Section III**

Conformance with Revision 31 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.92, Rev. 2, 7/06 – Combining Modal Responses and Spatial Components in Seismic Response Analysis**

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.94, Rev. 1, 4/76 – Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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**Regulatory Guide 1.97, Rev. 4, 6/06 – Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants**

Conformance with Revision 3 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.112, Rev. 1, 3/07 – Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power Reactors**

Conformance of the design aspects with Revision 0-R of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	ANSI 18.1-1999	Conforms
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**Regulatory Guide 1.116, Rev. 0-R, 5/77 – Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems**

Conformance for DCD scope of work is as stated in the DCD. Conformance for remaining scope is documented below.

General	Exception	Quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards.
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**Regulatory Guide 1.124, Rev. 2, 2/07 – Service Limits and Loading Combinations for Class 1 Linear-Type Supports**

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.128, Rev. 2, 2/07 – Installation Design and Installation of Vented Lead-Acid Storage Batteries for Nuclear Power Plants**

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.130, Rev. 2, 3/07 – Service Limits and Loading Combinations for Class 1 Plate-And-Shell-Type Supports**

Conformance with Revision 1 of the Regulatory Guide is as stated in the DCD. This guidance is completely within the scope of the DCD.

**Regulatory Guide 1.139, Rev. 0, 5/78 – Guidance for Residual Heat Removal**

Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 32750, 06/10/2008).

**Regulatory Guide 1.150, Rev. 1, 2/83 – Ultrasonic Testing of Reactor Vessel Welds During Preservice and Inservice Examinations**

Conformance with the design aspects is as stated in the DCD. The programmatic and/or operational aspects are not applicable since this guidance was withdrawn by NRC (73 FR 7766, 02/11/2008).

**Regulatory Guide 1.152, Rev. 2, 1/06 – Criteria for Use of Computers in Safety Systems of Nuclear Power Plants**

Conformance of the design aspects with Revision 1 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Exception	The Cyber Security Program is based on NEI 04-04 Revision 1 which has been identified by the NRC as an acceptable means for development of the program.
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**Regulatory Guide 1.168, Rev. 1, 2/04 – Verification, Validation, Reviews, and Audits for Digital Computer Software Used in Safety Systems of Nuclear Power Plants**

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Conforms
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**Regulatory Guide 1.174, Rev. 1, 11/02 – An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis**

This Regulatory Guide is outside the scope of the FSAR.

**Regulatory Guide 1.175, Rev. 0, 8/98 – An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing**

Risk-informed inservice testing is not being utilized for this plant.

**Regulatory Guide 1.178, Rev. 1, 9/03 – An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping**

Risk-informed inservice inspection is not being utilized for this plant.

**Regulatory Guide 1.180, Rev. 1, 10/03 – Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems**

Conformance of the design aspects with Revision 0 of the Regulatory Guide is as stated in the DCD. Conformance with Revision 1 of this Regulatory Guide for programmatic and/or operational aspects is documented below.

General	Conforms	Exclusion zones are established through administrative controls to prohibit the activation of portable EMI/RFI emitters (e.g., welders and transceivers) in areas where safety-related I&C systems are installed.
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**Regulatory Guide 1.197, Rev. 0, 5/03 – Demonstrating Control Room Envelope Integrity as Nuclear Power Reactors**

Conformance with the design aspects is as stated in the DCD. Conformance with programmatic and/or operational aspects is documented below.

General	Conforms
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7. COLA Part 2, FSAR, Chapter 1, Appendix 1AA will be revised to include the following new note:

Note – Above stated general alternatives regarding the use of previous revisions of the Regulatory Guide for design aspects as stated in the DCD is provided to preserve the finality of the certified design. Further, each stated conformance with the programmatic and/or operational aspects is only to the extent that a design change or departure from the approved DCD is not required to implement those programmatic and/or operational aspects.

**ATTACHMENTS/ENCLOSURES:**

None