



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

August 21, 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 – PIPE RUPTURE HAZARD ANALYSIS

Reference: Letter from Brian Hughes (NRC) to Andrea L. Sterdis (TVA), Request for  
Additional Information Letter No. 114 Related to SRP Section 03.6.2 for the  
Belleville Units 3 and 4 Combined License Application, dated August 7, 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 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 21st day of Aug, 2008.

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

Enclosure  
cc: See Page 2

DOBS  
NRO

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cc: (Enclosures)

E. Cummins, Westinghouse  
S. P. Frantz, Morgan Lewis  
M.W. Gettler, FP&L  
R. C. 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  
T. Simms, NRC/HQ  
G. A. Zinke, NuStart

cc: (w/o Enclosure)

B. 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. Register, DOE/PM  
L. Reyes, NRC/RII  
J. M. Sebrosky, NRC/HQ

Enclosure  
TVA letter dated August 21, 2008  
RAI Response

Response to NRC Request for Additional Information letter No. 114 dated August 7, 2008  
(2 pages, including this list)

Subject: Pipe Rupture Hazard Analysis in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
03.06.02-01	This letter – see following page

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

Enclosure  
TVA letter dated August 21, 2008  
RAI Response

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

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 03.06.02-01**

In the Bellefonte Units 3 & 4 COL Application, Part 2, FSAR Section 3.6, the applicant stated that this section of the referenced DCD is incorporated by reference with the exception of STD COL 3.6-1. Specifically, the applicant stated: "A pipe rupture hazard analysis is part of the piping design. It is used to identify postulated break locations and layout changes, support, design, whip restraint design, and jet shield design. The final design for these activities will be completed prior to fabrication and installation of the piping and connected components. The as-built reconciliation of the pipe break hazards analysis in accordance with the criteria outlined in DCD Subsection 3.6.1.3.2 and 3.6.5.2 will be completed prior to fuel load." Moreover, in COL Application Part 10, License Conditions and ITAAC, the applicant identified the COL Item 3.6-1 to be a COL Holder Item. The applicant further proposed that this COL Holder Item be addressed by a Combined License Condition in accordance with the guidance in Regulatory Guide, Section C.III.4.3. The applicant identified that the implementation milestone of this License Condition is prior to initial fuel load. Pursuant to RG 1.206, Section C.III.4.3, propose a method for ensuring the final closure of the item following issuance of the COL. Provide a description pertaining to the closure schedule of the as-design pipe rupture hazard analysis activities, and include implementation schedules that would allow the coordination of activities with the NRC construction inspection program following issuance of the COL.

**BLN RAI ID: 1168**

**BLN RESPONSE:**

As indicated in the question, COL Holder item 3.6-1 requires "The as-built reconciliation of the pipe break hazards analysis in accordance with the criteria outlined in DCD Subsection 3.6.1.3.2 and 3.6.5.2 will be completed prior to fuel load." The proposed license condition is the intended method for ensuring the final closure of COL Holder item 3.6-1 following issuance of the COL but prior to fuel load. In addition, there are several DCD ITAAC related to the final pipe rupture analyses which contain relevant as-built pipe rupture analysis acceptance criteria. However, 10 CFR 52.99(a) does not require that a schedule for implementing ITAAC be provided to the NRC until one year after issuance of the combined license. Further, details of the implementation milestones for the as-built reconciliation are not currently available, nor are the implementation milestones expected to be available until after a detailed construction schedule of the plant has been developed. Appropriate scheduling information will be provided, when available, to the NRC as necessary to support timely completion of their inspection and audit functions.

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.

**ASSOCIATED ATTACHMENTS/ENCLOSURES:**

None