



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

August 5, 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 – INTRODUCTION AND INTERFACES**

Reference: Letter from Tanya Simms (NRC) to Andrea Sterdis (TVA), Request for
Additional Information Letter No. 050 Related to SRP Section 01 for the
Bellefonte Units 3 and 4 Combined License Application, dated June 25, 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 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 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 5th day of AUG, 2008.

Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure

cc: See Page 2

D085
LRO

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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 5, 2008
RAI Response

Response to NRC Request for Additional Information letter No. 050 dated June 25, 2008
(3 pages, including this list)

Subject: Conformance with Regulatory Guide 1.152 in the Final Safety Analysis Report

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

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

Enclosure
TVA letter dated August 5, 2008
RAI Response

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 01.01

Appendix 1AA of the FSAR states that conformance with Revision 1 of Regulatory Guide 1.152, "Criteria for Use of Computers in Safety Systems of Nuclear Power Plants," is documented in the DCD. Conformance with Revision 2 of this Regulatory Guide for programmatic and/or operational aspects is also documented. The NRC staff reviewed the material within this section of the FSAR and could not identify the justification or explanation of how Revision 2 of Regulatory Guide 1.152 will be applied for the programmatic and/or operational aspects.

Therefore, please indicate where the programmatic and/or operational aspects of Regulatory Guide 1.152, Revision 2, are located in the Bellefonte Final Safety Analysis Report (FSAR).

BLN RAI ID: 0620

BLN RESPONSE:

FSAR Appendix 1AA is taking exception to programmatic and/or operational aspects of Regulatory Guide 1.152 Revision 2. This position remains unchanged; however, as stated in Westinghouse Technical Report APP-W-GLR-104, Revision 1 "AP1000 Cyber Security Implementation" section 2.2, Cyber Security Program is based on NEI 04-04 in lieu of Regulatory Guide 1.152 Revision 2. FSAR Appendix 1AA will be revised as shown below to clarify operational program compliance with RG 1.152. FSAR Section 13.6 will be revised to include the cyber security program as an operational program based on the NRC endorsed NEI 04-04 Revision 1. FSAR Table 1.8-202 will be revised to add new COL holder item 13.6-5 for Cyber Security.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 2, FSAR Chapter 1, Appendix 1AA, conformance with Regulatory Guide 1.152 will be revised from:

Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Reg. Guide 1.152, Rev. 2, 1/06 – Criteria for Use of Computers in Safety Systems of Nuclear Power Plants			
Conformance with Revision 1 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects 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	Conformance is to Revision 1 of Regulatory Guide 1.152."

Enclosure
TVA letter dated August 5, 2008
RAI Response

To read:

Criteria Section	Referenced Criteria	FSAR Position	Clarification/ Summary Description of Exceptions
Reg. Guide 1.152, Rev. 2, 1/06 – Criteria for Use of Computers in Safety Systems of Nuclear Power Plants			
Conformance with Revision 1 of the Regulatory Guide is documented in the DCD. Conformance of the design aspects 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	Cyber Security Program is based on NEI 04-04 Revision 1. This NEI document has been endorsed by the NRC as an acceptable means for development of Cyber Security Program. The remaining operational aspects are based on RG 1.152, Rev. 2.	

2. COLA Part 2, FSAR Chapter 1, Table 1.8-202 will be revised to add the following COL item.

COL ITEM	SUBJECT	DCD SUBSECTION	FSAR SECTION(S)	COL APPLICANT (A), HOLDER (H) OR BOTH (B)
13.6-5	Cyber Security Program	13.6.1	13.6, 13.6.1	H

3. COLA Part 2, FSAR Chapter 13, Section 13.6, will be revised to add the following paragraph.

An operational program following the guidance of NRC endorsed NEI 04-04 Revision 1 will be implemented prior to fuel load.

4. COLA Part 2, FSAR Chapter 13, Section 13.6.1, will be revised to add STD COL 13.6-5 as shown below.

STD COL 13.6-5 as a new paragraph to read, "Information for the cyber security program portion of this COL item is addressed in 13.6.

ATTACHMENTS/ENCLOSURES:

None