



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

September 3, 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 – INITIAL PLANT TEST PROGRAM

Reference: Letter from Manny Comar (NRC) to Andrea Sterdis (TVA), Request for  
Additional Information Letter No. 102 Related to SRP Section 14.02 for the  
Belleville Units 3 and 4 Combined License Application, dated August 5, 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 3rd day of Sep, 2008.

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

Enclosure  
cc: See Page 2

D085  
NR0

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Page 2

September 3, 2008

cc: (w/Enclosure)

J. P. Berger, EDF  
M. M. Comar, NRC/HQ  
E. Cummins, Westinghouse  
S. P. Frantz, Morgan Lewis  
M.W. Gettler, FP&L  
R. C. Grumbir, NuStart  
P. S. Hastings, NuStart  
P. Hinnenkamp, Entergy  
B. Hughes, NRC/HQ  
M. C. Kray, NuStart  
D. Lindgren, Westinghouse  
G. D. Miller, PG&N  
M. C. Nolan, Duke Energy  
N. T. Simms, Duke Energy  
K. N. Slays, NuStart  
G. A. Zinke, NuStart

cc: (w/o Enclosure)

R. G. Joshi, 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 September 3, 2008  
RAI Responses

Responses to NRC Request for Additional Information letter No. 102 dated August 5, 2008  
(3 pages, including this list)

Subject: Initial Test Program in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
14.02-10	This letter – see following pages
14.02-11	This letter – see following pages

Associated Additional Attachments / Enclosures

None

Pages Included

Enclosure  
TVA letter dated September 3, 2008  
RAI Responses

**NRC Letter Dated: August 5, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 14.02-10**

Section C.I.14.2.4 of RG 1.206 states that the COL applicant should describe the methods and identify provisions to ensure that retesting that is required for modifications or maintenance remains in compliance with ITAAC commitments. Explain how Section 14.2.3.2 of the Bellefonte COL application includes provisions to ensure that retesting required for modifications or maintenance remains in compliance with ITAAC commitments, when applicable; alternatively, explain why this is not necessary.

Revise Subsection 14.2.3.2 as appropriate.

**BLN RAI ID: 1003**

**BLN RESPONSE:**

Changes to the plant are controlled by configuration control including normal maintenance, repairs, and design changes. The configuration control process, quality assurance and corrective action programs require changes to the plant configuration be reviewed for impact, including licensing documents. FSAR Section 14.2 will be revised to include maintenance of ITAACs in the test results review.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

COLA Part 2, FSAR. Chapter 14, Subsection 14.2.3.2 will be revised to include the following bullet in STD COL 14.4-4:

- Verifying that the results of retesting do not invalidate ITAAC acceptance criteria.

**ASSOCIATED ATTACHMENTS/ENCLOSURES:**

None

Enclosure  
TVA letter dated September 3, 2008  
RAI Responses

**NRC Letter Dated: August 5, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 14.02-11**

Section C.I.14.2.11 of RG 1.206 states that the COL applicant should identify and cross-reference each test (or portion thereof) required to be completed before initial fuel loading designed to satisfy the requirements for completing ITAAC. Explain how Section 14.2 of the Bellefonte COL FSAR includes provisions to ensure that required tests to be completed before initial fuel loading to satisfy ITAAC are adequately identified; alternatively, explain why this is not necessary. Revise Section 14.2 as appropriate.

**BLN RAI ID: 1004**

**BLN RESPONSE:**

Test procedures (or sections of) will be cross referenced to ITAACs. In addition, ITAAC closure will include references to facilitate NRC review and acceptance. As indicated by Westinghouse Technical Report 71B (APP-GW-GLR-038), Procedure Specifications will include acceptance criteria. The test procedures implement the Test Specifications. In addition, FSAR Chapter 14 will be revised to include development of a cross reference list between ITAACs and test procedures and/or sections of procedures. Since neither Chapter 14 testing nor the ITAACs will be completed until after the COL is issued, development of the cross reference list prior to beginning Chapter 14 testing should be sufficient to satisfy this guidance.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

COLA Part 2, FSAR. Chapter 14, Subsection 14.4.2 will be revised to include the following:

A cross reference list is provided between ITAACs and test procedures and/or sections of test procedures.

**ASSOCIATED ATTACHMENTS/ENCLOSURES:**

None