



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

September 15, 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 – OPERATING PROCEDURES**

Reference: Letter from Brian C. Anderson (NRC) to Andrea L. Sterdis (TVA), Request for
Additional Information Letter No. 098 Related to SRP Section 13.05.02.01 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) item 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 15th day of Sept, 2008.

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

Enclosure
cc: See Page 2

DO85
NRO

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cc: (w/Enclosure)

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D. Lindgren, Westinghouse
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C. R. Pierce, SNC
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T. Simms, NRC/HQ
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Enclosure
TVA letter dated September 15, 2008
RAI Response

Responses to NRC Request for Additional Information letter No. 098 dated August 5, 2008
(3 pages, including this list)

Subject: Operating procedures in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
13.05.02.01-01	This letter – see following pages

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

Enclosure
TVA letter dated September 15, 2008
RAI Response

NRC Letter Dated: August 5, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 13.05.02.01-01

NUREG-0800, Section 13.5.2.1, states that the procedure development program, as described in the procedures generation package (PGP) for emergency operating procedures (EOPs), should be submitted to the NRC at least three months prior to the date the applicant plans to begin formal operator training on the EOPs; that for plants referencing generic guidelines, the submitted documentation should include (1) a description of the process used to develop plant-specific guidelines from the generic guidelines, (2) identification of significant deviations from the generic guidelines (including identification of additional equipment beyond that identified in the generic guidelines), along with all necessary engineering evaluations or analyses to support the adequacy of each deviation, and (3) a description of the process used for identifying operator information and control requirements; that the PGP should include a plant-specific writer's guide; that the PGP should include a description of the program for verification and validation (V&V) of EOPs; and that the PGP should include a description of the program for training operators on EOPs.

Clarify specifically: 1) whether the TR-70 and its associated documents do comprise the PGP; 2) whether the Westinghouse-provided generic guidelines are also the Bellefonte-specific technical guidelines, and whether those guidelines contain the action steps necessary to mitigate transients and accidents in a sequence that allows mitigation without first having diagnosed the specific event, along with all supporting analyses, to meet the requirements of TMI Action Plan item I.C.1; 3) whether the Westinghouse-provided generic writers' guides are also the Bellefonte-specific writers' guides; 4) whether Westinghouse will perform the EOP V&V program; and 5) whether the operator training program description for EOPs is located in FSAR, Section 13.2.

BLN RAI ID: 0737

BLN RESPONSE:

- 1) The procedures generation package (PGP) for the EOPs is comprised of TR-70 and the following associated documents:
 - APP-GJ01-GYP-001, "AP1000 Job and Task Analysis Procedure;"
 - APP-GJ01-GTP-002, "AP1000 Training Material Design and Development Procedure;"
 - APP-OCS-GEH-020, Rev. 2, "Programmatic Level Description of the AP1000 Human Factors Verification and Validation Plan;" and
 - DCD Section 13.2.
- 2) The Westinghouse-provided generic guidelines for the EOPs are applicable to all AP1000 plants and will be used to fulfill the function of the plant-specific technical guidelines for the EOPs. These generic guidelines meet AP1000 design certification requirements with respect to TMI Action Plan item I.C.1.
- 3) The Westinghouse-provided generic writer's guides for the EOPs are applicable to all AP1000 plants and will be used to fulfill the function of the plant-specific writer's guides for the EOPs.
- 4) Westinghouse will perform the EOP V&V program, with participation of the Builder's Group representatives.
- 5) The operator training program description for EOPs is located in FSAR Section 13.2.

Enclosure
TVA letter dated September 15, 2008
RAI Response

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