



Bellefonte Unit 3 and 4 COLA: Non-Flood Related Sections

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RAIs to date

NRC has issued one round of RAIs. TVA's responses were received toward the end of August:

- Section 2.4.02 = 8 questions (flood)
- Section 2.4.03 = 7 questions (flood)
- Section 2.4.06 = 1 question (hill slope failure)
- Section 2.4.12 = 7 questions (groundwater)
- Section 2.4.13 = 5 questions (radionuclide transport)

TVA's groundwater & rad transport responses included:

- Numerical modeling (RESRAD) of a Karst system (complex fractured flow).
- More than 370 pgs of data, including new Core Boring Logs to replace FSAR Appendix 2BB.
- TVA's self-identified porosity revisions (July 23 TVA letter).

Review Support and Schedule

- NRC staff commits to continue reviewing TVA's responses and to submit RAIs for all 2.4 Sections (non-flood sections are not in abeyance).
- PNNL has been retained to assist NRC with development of SER Section 2.4. Ongoing contracts are structured around a contiguous SER Section 2.4. Increasing the granularity of Section 2.4 would require contract modifications plus it would increase the complexity associated with describing the common hydrologic resource.
- The BLN SER is already on multiple schedules. Increasing the granularity of the SER Section 2.4 delivery schedule would increase NRC's burden.