## PMBelCOL PEmails

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**Sent:** Thursday, June 05, 2008 4:29 PM
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**Subject:** Letters to NRC Dated June 5, 2008
**Attachments:** Response to RAI Pre-Service Examination LetterNo. 006.pdf; Response to RAI - Steam Generator Program Letter No. 3.pdf; Response to RAI - Pressure Temperature Limits.pdf

The following attachments are letters mailed to NRC on June 5, 2008

1. <<Response to RAI Pre-Service Examination LetterNo. 006.pdf>> 2. <<Response to RAI - Steam Generator Program Letter No. 3.pdf>> 3. <<Response to RAI - Pressure Temperature Limits.pdf>>

*Carolyn Creek*
Management Assistant
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**Hearing Identifier:** Bellefonte_COL_Public_EX
**Email Number:** 871

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**Subject:** Letters to NRC Dated June 5, 2008
**Sent Date:** 6/5/2008 4:29:24 PM
**Received Date:** 6/5/2008 4:30:59 PM
**From:** Creek, Carolyn P

**Created By:** cpcreek@tva.gov

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| **Files** | **Size** | **Date & Time** |
|---|---|---|
| MESSAGE | 447 | 6/5/2008 4:30:59 PM |
| Response to RAI Pre-Service Examination LetterNo. 006.pdf | 418637 | |
| Response to RAI - Steam Generator Program Letter No. 3.pdf | 619044 | |
| Response to RAI - Pressure Temperature Limits.pdf | 457966 | |

**Options**
**Priority:** Standard
**Return Notification:** No
**Reply Requested:** No
**Sensitivity:** Normal
**Expiration Date:**
**Recipients Received:**

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

June 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 – PRE-SERVICE EXAMINATION

Reference Letter: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 006 Related to SRP Section 03.09.06 for the Bellefonte Units 3 and 4 Combined License Application, dated April 24, 2008.

This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) items included in the reference letter. The items address the pre-service examination requirements.

The enclosures provide responses to the RAI and identify 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, LP 5A, 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 5th day of June, 2008.

Jack A. Bailey

Jack A. Bailey
Vice President, Nuclear Generation Development & Construction

Enclosure
cc: See Page 2

cc: (Enclosure)
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R.G. Joshi/NRC
M.P. Cazaubon, NuStart
R. B. Clary, SCE&G
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P.S. Hastings, NuStart
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A.M. Monroe, SCE&G
C. R. Pierce, SNC
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L. Reyes, NRC/RII

Enclosure
TVA Letter Dated June 5, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 006 dated April 24, 2008 (2 pages)

Subject: Pre-service inspection in the Final Safety Analysis Report

| RAI Number | Date of TVA Response |
|---|---|
| 03.09.06-01 | This letter – see following pages |

| Attachments / Enclosures | Pages Included |
|---|---|
| None | NA |

**NRC Letter Dated: April 24, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 03.09.06-01**

The Bellefonte COL application in FSAR Section 3.9.3.4.4 (page 3.9-4) states that if the period between the initial pre-service examination and initial system preoperational tests exceeds 6 months, reexamination of items i, iv, and v is performed. The FSAR does not contain items listed as i, iv, and v. Clarify the items to be reexamined.

**BLN RAI ID: 0303**

**BLN RESPONSE:**

The items to be reexamined are the items identified as numbers 1, 4 and 5 in the list of items just preceding the paragraph. Renumbering during the development of the FSAR text resulted in the incorrect references. Note that this error was also identified and corrected as described below in Errata Report No. 2, item AP-STD-221, submitted to NRC by TVA on April 28, 2008.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

COLA Part 2, FSAR Chapter 3, Section 3.9.3.4.4, second paragraph, first sentence, will be revised from:

"If the period between the initial pre-service examination and initial system preoperational tests exceeds 6 months, reexamination of Items i, iv, and v is performed."

To read:

"If the period between the initial pre-service examination and initial system preoperational tests exceeds 6 months, reexamination of Items 1, 4, and 5 is performed."

**ATTACHMENTS/ENCLOSURES:**

None

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

June 5, 2008

10 CFR 52.79

U.S. Nuclear Regulatory Commission
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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 – STEAM GENERATOR PROGRAM

Reference Letter: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 003 Related to SRP Section 05.04.02.02 for the Bellefonte Units 3 and 4 Combined License Application, dated April 22, 2008.

This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) items included in the reference letter. The items address the steam generator tube inspection program.

The enclosure provides responses to the RAIs and identifies 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, LP 5A, 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 5th day of June, 2008.

Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure

cc: (w/enclosure)

M.P. Cazaubon, NuStart
R. B. Clary, SCE&G
E. Cummins, Westinghouse
S. P. Frantz, Morgan Lewis
M.W.Gettler, FP&L
R.C. Grumbir, NuStart
P.S. Hastings, NuStart
P. Hinnenkamp, Entergy
R.G. Joshi, NRC PM
D. Lindgren, Westinghouse
G.D .Miller, PGN
G. Serviere,
G.A. Zinke, NuStart

(w/o enclosure)

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M.C.Kray, NuStart
A.M.Monroe, SCE&G
C. R.Pierce, SNC
R. Reister, DOE/PM
L. Reyes, NRC/RII

Enclosure
TVA letter dated June 5, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 003 dated April 22, 2008
(4 Pages, including this list)

Subject: Steam generator program in the Final Safety Analysis Report

| RAI Number | Date of TVA Response |
|---|---|
| 05.04.02.02-01 | This letter – see following pages |
| 05.04.02.02-02 | This letter – see following pages |

| Attachments / Enclosures | Pages Included |
|---|---|
| None | NA |

**NRC Letter Dated: April 22, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 05.04.02.02-01**

According to SRP Section 5.4.2.2, the Steam Generator Program is an operational program that should be fully described, with implementation milestones listed in the appropriate table in Chapter 13 of the FSAR. Because Table 13.4-201 ("Operational Programs Required by NRC Regulations") of the COL application for Bellefonte Units 3 and 4 does not reference FSAR Section 5.4 or the Technical Specifications containing the implementation requirements for steam generator tube inspection, please discuss how the application ensures the Steam Generator Program is included as an operational program.

**BLN RAI ID: 0102**

**BLN RESPONSE:**

TVA will revise FSAR Table 13.4-201 to include the steam generator tube inspection programs in the Inservice and Pre-Service Inspection Programs by including a reference to FSAR Section 5.4.2.5.

Note that the change also includes editorial revisions in the reference to the "requirements" (far right) column in the FSAR change identified below. Deletion of the ASME XI years in item 1 is for consistency with item 4; the years are not necessary in this table because they are provided in the appropriate text.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

COLA Part 2, FSAR Chapter 13, Table 13.4-201, will be revised from:

| | | | | | |
|---|---|---|---|---|---|
| 1. | Inservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4, 6.6 | Prior to Commercial service | 10 CFR 50.55a(g); ASME XI 2001 2004 IWA 2430(b) (Reference 201) |

To read:

| | | | | | |
|---|---|---|---|---|---|
| 1. | Inservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4, 5.4.2.5, 6.6 | Prior to Commercial service | 10 CFR 50.55a(g); ASME XI IWA-2430(b) (Reference 201) |

COLA Part 2, FSAR Chapter 13, Table 13.4-201, will be revised from:

| | | | | | |
|---|---|---|---|---|---|
| 4. | Preservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4, 6.6 | Completion prior to initial plant start-up | 10 CFR 55a(g); ASME Code Section XI IWB-2200(a) (Reference 201) |

To read:

| | | | | | |
|---|---|---|---|---|---|
| 4. | Preservice Inspection Program | 10 CFR 50.55a(g) | 5.2.4, 5.4.2.5, 6.6 | Completion prior to initial plant start-up | 10 CFR 50.55a(g); ASME XI IWB-2200(a) (Reference 201) |

**ATTACHMENTS/ENCLOSURES:**

None

**NRC Letter Dated: April 22, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 05.04.02.02-02**

According to SRP Section 5.4.2.2, an acceptable steam generator inspection program will ensure that all tubes are inspected before being placed into service, using techniques that are expected to be used during subsequent inspections. Since this preservice inspection is not addressed by the proposed Technical Specifications, please discuss how TVA will ensure it is performed for Bellefonte Units 3 and 4.

**BLN RAI ID: 0302**

**BLN RESPONSE:**

TVA will revise FSAR Table 13.4-201 to include the steam generator tube inspection programs in the Pre-Service Inspection Program by including a reference to FSAR Section 5.4.2.5.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

COLA Part 2, FSAR Chapter 13, Table 13.4-201, will be revised as shown in the response to NRC RAI Number 05.04.02.02-01.

**ATTACHMENTS/ENCLOSURES:**

None

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

June 5, 2008

10 CFR 52.79

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

In the Matter of )
Tennessee Valley Authority )

Docket No. 52-014 and 52-015

BELLEFONTE (BLN) COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) – PRESSURE-TEMPERATURE LIMITS

Reference Letter: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 005 Related to SRP Section 05.03.02 for the Bellefonte Units 3 and 4 Combined License Application, dated April 23, 2008.

This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory Commission (NRC) RAI items included in the reference letter. The items address the pressure-temperature limits.

The enclosure provides responses to the RAI and identifies 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, LP 5A, 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 5th day of June, 2008.

Jack A. Bailey

Jack A. Bailey
Vice President, Nuclear Generation Development

Enclosure
cc: See page 2

cc (Enclosure)

J.M. Sebrosky, NRC/HQ
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M.P. Cazaubon, NuStart
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Enclosure
TVA Letter Dated June 5, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 005 dated April 23, 2008
(2 Pages, including this list)

Subject: Pressure-temperature limits in the Final Safety Analysis Report

| RAI Number | Date of TVA Response |
|---|---|
| 05.03.02-01 | This letter – see following pages |
| | Future submittal as identified in the response |

| Attachments / Enclosures | Pages Included |
|---|---|
| None | |

**NRC Letter Dated: April 23, 2008**

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER: 05.03.02-01**

The NRC staff's understanding is that a) Westinghouse intends to submit for NRC staff review and approval a generic Pressure Temperature Limit Report (PTLR) for the AP1000 reactor vessel using the bounding properties and b) Westinghouse intends to seek NRC approval to update the AP1000 DCD to include the use of the generic AP1000 PTLR by all COL applicants. In light of these assumptions, please explain whether TVA will revise the proposed license condition in the Bellefonte Nuclear Plant, Units 3 and 4 Application, Part 10, Section 2, COL Holder Items, COL Item # 5.3-1, as follows: "The COL Holder shall update the P/T limits using the PTLR methodologies approved in the AP1000 DCD, and using the plant-specific material properties. The COL Holder will inform the NRC of the updated P/T limits." This approach would be consistent with that used for all operating reactors (see NRC Generic Letter 96-03), under which licensees using PTLRs inform the NRC staff of any subsequent change in P/T limits, without the need for prior NRC approval, as long as there are no changes to the approved PTLR methodology.

**BLN RAI ID: 0103**

**BLN RESPONSE:**

A response to this request would be premature prior to the actual Westinghouse submittal of the expected generic Pressure Temperature Limit Report (PTLR) for the AP1000 reactor vessel using the bounding properties, along with a revised Combined License Information Item. A revised response to this request will be provided within 30 days of the Westinghouse submittal.

However, it should be noted that it is our understanding that the Westinghouse generic PTLR is intended to provide generic curves that can be used without further evaluation if the reactor vessel material properties meet specifications. Thus, the proposed revision to the license condition will likely allow use of the generic curves if the reactor vessel material properties meet specifications.

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

**ASSOCIATED BLN COL APPLICATION REVISIONS:**

The COLA revisions associated with this response have not yet been determined

**ATTACHMENTS/ENCLOSURES:**

None