PMBeICOL PEmails

From: Ray, Phillip M [pmray@tva.gov]
Sent: Monday, July 28, 2008 8:27 AM
To: Ravindra Joshi; Joseph Sebrosky
Subject: courtesy copy
Attachments: BLN Hydrology whitepaper rev1submittal letter B.pdf; BLN RAI Response to RAI Letter 051 final 20080722.pdf; BLN RAI Response to RAI Letter 052 Approval 0080722pmr.pdf

Ravi,

Attached are courtesy copies of the mailed responses.

Phil

Hearing Identifier: Bellefonte_COL_Public_EX
Email Number: 879

Mail Envelope Properties (28921B76CDD05940A918AEEC9EBCA7C0078D82E0)

Subject: courtesy copy
Sent Date: 7/28/2008 8:26:50 AM
Received Date: 7/28/2008 8:27:07 AM
From: Ray, Phillip M

Created By: pmray@tva.gov

Recipients:
"Ravindra Joshi" <Ravindra.Joshi@nrc.gov>
Tracking Status: None
"Joseph Sebrosky" <Joseph.Sebrosky@nrc.gov>
Tracking Status: None

Post Office: TVACOCXVS1.main.tva.gov

Files	Size	Date & Time
MESSAGE	72	7/28/2008 8:27:07 AM
BLN Hydrology whitepaper rev1submittal letter B.pdf	130283	
BLN RAI Response to RAI Letter 051 final 20080722.pdf	276036	
BLN RAI Response to RAI Letter 052 Approval 0080722pmr.pdf	260554	

Options
Priority: Standard
Return Notification: No
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Expiration Date:
Recipients Received:

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

July 25, 2008

10 CFR 52.79

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

In the Matter of) Docket No. 52-014 and 52-015
Tennessee Valley Authority)

NUCLEAR REGULATORY COMMISSION (NRC) – BELLEFONTE NUCLEAR PLANT (BLN) – REVIEW OF BLN APPLICATION – WHITE PAPER – HYDROLOGIC ANALYSIS DESCRIPTION

Reference:

1. Letter from Ashok Bhatnagar (TVA) to Mr. R. William Borchardt (NRC), Application for Combined License for BLN 3 and 4, dated October 30, 2007.
2. Letter from Jack Bailey (TVA) to Mr. R. William Borchardt (NRC), TVA Plan for Addressing NRC-Identified Issues Regarding BLN's Hydrology Calculation, dated March 14, 2008.
3. Letter from Andrea Sturdis (TVA) to Mr. Joseph M. Sebrosky (NRC), White Paper – Hydrologic Analysis Description, dated April 17, 2008.
4. Memorandum from Mr. Joseph M. Sebrosky (NRC) to Stephanie Coffin (NRC) Trip Report - May 13-16, 2008, Hydrology-Related Site Visit in Support of the Bellefonte Combined License Application, dated June 12, 2008.
5. Letter from Mr. Joseph M. Sebrosky (NRC) to Andrea Sturdis (TVA), Request for Additional Information [RAI] Letter No. 064 Related to SRP Section 2.4.2 for the Bellefonte Units 3 and 4 Combined License Application, dated July 3, 2008.

The purpose of this letter is to transmit to the (NRC) a revised BLN whitepaper entitled, "Hydrologic Analysis Description," discussed in TVA's letter dated March 14, 2008 (Reference 2). The whitepaper was developed as an NRC reviewer aide for the probable maximum Flood (PMF) calculation contained in the BLN application dated October 30, 2007 (Reference 1). The whitepaper was originally transmitted by TVA's letter dated April 17, 2008 (Reference 3). Verbal comments and questions from the NRC staff were discussed during the May 13-16, 2008, hydrology site visit. These comments and questions were captured in the staff's trip report dated June 12, 2008 (Reference 4). The enclosed whitepaper, "Hydrologic Analysis Description," revision 1 (Enclosure 1), addresses the comments and questions and provides additional clarification and discussion regarding the PMF calculation. In addition to the revised whitepaper,

Enclosure 2 provides a table of extracted commitments made in the discussion portion of the paper.

The information contained in Enclosure 1 will be referenced in some of the responses to the RAI questions from letter dated July 3, 2008 (Reference 5), that will be transmitted under separate cover.

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 _____day of _____ , 2008.

Jack A. Bailey
Vice President,
Nuclear Generation Development

Enclosure 1: Hydrologic Analysis Description, Rev 1
Enclosure 2: BLN Hydrologic Analysis Description - NRC Commitment Tracking Table
cc: See Page 3

cc: (Enclosures)

J. P. Berger, EDF
J. M. Sebrosky, NRC/HQ
E. Cummins, Westinghouse
S. P. Frantz, Morgan Lewis
M. W. Gettler, FP&L
R . 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
G. A. Zinke, NuStart

cc: (w/o Enclosure)

B. C. Anderson, NRC/HQ
M.M. Comar, NRC/HQ
B. Hughes/NRC/HQ
R. G. Joshi, NRC/HQ
R. H. Kitchen, PGN
A. M. Monroe, SCE&G
C. R. Pierce, SNC
R. Reister, DOE/PM
L. Reyes, NRC/RII
T. Simms, NRC/HQ

Hydrologic Analysis Description
Revision 1
July 2008

BLN Hydrologic Analysis Description
NRC Commitment Tracking Table
July 25, 2008

Enclosure 2- Hydrologic Analysis Description

No.	Commitment	Source	Due Date	Status
c.1	Further comparative analyses between the two versions of the codes [SOCH88 vs. SOCH90PC] will be completed during the update and verification process.	Whitepaper R0 Page 34	End of Phase 1 03/16/09	
c.2	Issue Revision 1 of the Whitepaper	April 17th Letter	July 25th	Plan to update by July 25th, and incorporate any comments from the workshop.
c.3	As part of the update and verification process Chickamauga discharges with and without dam failure (those that would overtop the dam) will be computed past BLN site.	Whitepaper R0 Page 52	End of Phase 1 03/16/09	
c.4	During the update and verification process all flood routings will be computed down to Guntersville Dam which will allow determination of flood levels at BLN.	Whitepaper R0 Page 60	End of Phase 1 03/16/09	
c.5	River cross-sectional geometry data used in the SOCH code are being checked for accuracy and being updated where appropriate by current bathymetry data.	Whitepaper R0 Page 62	End of Phase 1 03/16/09	
c.6	The SOCH code will be recalibrated and verified to updated steady-state step backwater profiles for the affected reservoirs. This will include calibration of the 2003 flood against observed data in Watts Bar, Chickamauga, Nickajack, and Guntersville Reservoirs.	Whitepaper R0 Page 62	End of Phase 1 03/16/09	

Enclosure 2
TVA letter dated July 25, 2008
BLN Hydrologic Analysis Description - NRC Commitment Tracking Table

No.	Commitment	Source	Due Date	Status
c.7	Unit hydrographs developed by TVA for the 45 sub-basins above BLN are being independently verified by using more recent storm data, where appropriate, and by use of the HEC1 computer code. Where the unit hydrographs differ, the basis for change will be documented. The updated unit hydrographs will be used to generate new design storm inflows, which will be verified by use of the HEC1 code.	Whitepaper R0 Page 62	End of Phase 1 03/16/09	
c.8	The updated runoff and stream course models will be used to compute PMF and seismic event maximum flood levels at BLN.	Whitepaper R0 Page 62	End of Phase 1 03/16/09	
c.9	Reservoir operating guides and spillway rating curves are being reviewed, checked and updated as appropriate.	Whitepaper R0 Page 62	End of Phase 1 03/16/09	

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

July 25, 2008

10 CFR 52.79

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In the Matter of) Docket No. 52-014 and 52-015
Tennessee Valley Authority)

BELLEFONTE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION – CODE RECONCILIATION

Reference: Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 051 Related to SRP Section 05.02.01.01 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 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 25th day of July, 2008.

Jack A. Bailey,
Vice President,
Nuclear Generation Development

Enclosure
cc: See page 2

cc: (Enclosures)
J. P. Berger, EDF
E. Cummins, Westinghouse
S. P. Frantz, Morgan Lewis
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R. C. Grumbir, NuStart
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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 July 25, 2008
RAI Responses

Responses to NRC Request for Additional Information letter No. 051 dated June 25, 2008
(5 pages, including this list)

Subject: Code Reconciliation in the Final Safety Analysis Report

RAI Number	Date of Response
05.02.01.01-02	This letter – see following pages
05.02.01.01-03	This letter – see following pages
05.02.01.01-04	This letter – see following pages
05.02.01.01-05	This letter – see following pages

Associated Additional Attachments / Enclosures	Pages Included
None	

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.01-02

Subsection 5.2.1.1 of AP1000 DCD Tier 2 discusses the application of ASME BPV Code, Section III, for the design and fabrication of reactor coolant pressure boundary components. Other ASME BPV Code sections and the ASME OM Code are not discussed in this subsection. Discuss the application at Bellefonte of sections of the ASME BPV Code and the ASME *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code) not referenced in Subsection 5.2.1.1 of AP 1000 DCD Tier 2.

BLN RAI ID: 0595

BLN Response:

Section 5.2 of the AP1000 DCD Tier 2 discusses the measures to provide and maintain the integrity of the reactor coolant pressure boundary (RCPB) during plant operation. DCD Subsection 5.2.1 discusses compliance with Codes and Code Cases and DCD Subsection 5.2.1.1 discusses compliance with 10 CFR 50.55a with respect to Code compliance, providing the edition and addenda applicable to the design of the AP1000 reactor coolant pressure boundary components and materials. DCD and FSAR Subsections 5.2.4 discuss the ASME Code edition and addenda applicable to the preservice and inservice inspection programs, FSAR Subsection 3.9.6 discusses the applicable ASME OM Code edition and addenda for preservice and inservice testing of safety-related components (pumps, valves) and FSAR Subsection 3.9.3.4.4 discusses the ASME OM Code applicable to preservice and inservice testing of snubbers used as component and piping supports. FSAR Subsection 5.2.1.1 will be revised to provide references to these subsections that discuss ASME Section XI and OM Code (and thus 10 CFR 50.55a) compliance as indicated in the Application Revisions section below.

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

ASSOCIATED BLN COL APPLICATION REVISIONS

COLA Part 2, FSAR, Chapter 5, Subsection 5.2.1.1, will be revised to add the following new paragraph at the end of the subsection (the existing LMA STD COL 5.2-1 is applicable):

Inservice inspection of the reactor coolant pressure boundary is conducted in accordance with the applicable edition and addenda of the ASME Boiler and Pressure Vessel Code Section XI, as described in Subsection 5.2.4. Inservice testing of the reactor coolant pressure boundary components is in accordance with the edition and addenda of the ASME OM Code as discussed in Subsection 3.9.6 for pumps and valves, and as discussed in Subsection 3.9.3.4.4 for dynamic restraints.

ATTACHMENTS/ENCLOSURES

None

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.01-03

Bellefonte FSAR 5.2.1.1 indicates that if a later Code year/addenda than the Design Certification Code year/addenda is used by the material and/or component supplier, then a code reconciliation is performed. The reconciliation is performed using the methodology set forth in ASME Section XI for the repair and replacement of components. Provide justification for using Section XI inservice/inspection code for operating plants in the reconciliation for Section III new reactor designs.

BLN RAI: 596

BLN Response:

See the response to Bellefonte Combined License Application – Response To Request For Additional Information – Code Compliance, RAI No. 05.02.01.01-01, dated July 3, 2008.

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.

ATTACHMENTS/ENCLOSURES

None

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.01-04

Bellefonte FSAR Section 5.2.1.1 indicates that if Code Cases other than those included in AP1000 DCD Table 5.2-3 are used, a similar review and reconciliation are performed. Please explain how this meets 10CRF50.55a(a)(3), (b)(4), (b)(5) and (b)(6).

BLN RAI: 597

BLN Response:

No Code Cases other than those included in the DCD have been identified as necessary at this time. Code Cases approved by the NRC in Regulatory Guide 1.147 may be used, and if so, they will be identified in a revision to the FSAR. The FSAR statement regarding reconciliation of Code Cases is incorrect and will be revised as indicated in the Application Revisions section below.

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

ASSOCIATED BLN COL APPLICATION REVISIONS

COLA Part 2, FSAR, Chapter 5, Subsection 5.2.1.1, will be revised from:

Similarly, if Code Cases other than those included in DCD Table 5.2-3 are used, a similar review and reconciliation is performed.

To read:

Code Cases to be used in design and construction are identified in the DCD; additional Code Cases for design and construction beyond those for the design certification are not required.

ATTACHMENTS/ENCLOSURES

None

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.01-05

AP1000 DCD Revision 16 requires use of the 1989 Edition 1989 Addenda for NB-3200, NB-3600, NC-3600 and ND-3600 for construction of components and piping. List components that are designed and constructed using the 1989 ASME Code and discuss whether these components also meet requirements of the 1998 Edition through and including 2000 Addenda ASME Code, which is the code of record for AP1000 DCD.

BLN RAI: 598

BLN Response:

Westinghouse has recently submitted a document (APP-GW-GLE-005) by letter DCP/NRC2136 dated May 16, 2008, to partially address a discrepancy between NRC requirements and ASME Code Section III rules on the use of portions of the Code from different editions and addenda. The ASME Code, Section III citation in the AP1000 DCD Subsection 5.2. 1.1 requires the use of the 1998 Edition, 2000 Addenda; except that the 1989 Edition, 1989 Addenda is used for Subarticles NB-3200, NB-3600, NC-3600, and ND-3600. The DCD is to be changed to limit the use of 1989 Edition, 1989 Addenda to piping design only. While the 1989 Edition, 1989 Addenda will be used for piping design, the 1998 Edition, 2000 Addenda for Subarticles NB-3200, NB-3600, NC-3600, and ND-3600 will be used for design and construction of components other than piping. The use of the 1989 Edition, 1989 Addenda for these four subarticles is still included for piping design. This change is based on the understanding that the concerns that the NRC has with later versions of the four subarticles are confined to the seismic design of piping.

As Westinghouse explained in a technical review meeting on April 8, 2008, the expected approach for piping is to use the 1998 Edition, 2000 Addenda for piping design, except that for the four subarticles, NB-3200, NB-3600, NC-3600, and ND-3600, the 1989 Edition, 1989 Addenda will be used. As an example, the equations for calculations would come from the 1989 Addenda but the material property values used in the equations would come from other sections that use the 2000 Addenda. Fabrication and NDE requirements would also use the 2000 Addenda.

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.

ATTACHMENTS/ENCLOSURES

None

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

July 25, 2008

10 CFR 52.79

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

In the Matter of) Docket No. 52-014 and 52-015
Tennessee Valley Authority)

BELLEFONTE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION – SRP SECTION 05.02.01.02

Reference: Letter from Ravindra Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 052 Related to SRP Section 05.02.01.02 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 each 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 25th day of July, 2008.

Jack A. Bailey
Vice President
Nuclear Generation Development

Enclosure
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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 Date 25, 2008

Responses to NRC Request for Additional Information letter No. 052 dated June 25, 2008
(3 pages, including this list)

Subject: CODE RECONCILIATION in the Final Safety Analysis Report

RAI Number	Date of Response
05.02.01.02-01	This letter – see following pages
05.02.01.02-02	This letter – see following pages

Associated Additional Attachments / Enclosures	Pages Included
None	

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.02-01

In Section 5.2.6, "Combined License Information Items," of the AP1000 DCD Tier 2, Subsection 5.2.6.1 specifies that the COL applicant will address (a) portions of later ASME Code editions and addenda to be used to construct components that will require NRC staff review and approval; (b) consistency of the design with the construction practices (including inspection and examination methods) of later ASME Code edition and addenda added as part of the COL application; and (c) addition of ASME Code Cases approved subsequent to the Design Certification. In FSAR Section 5.2.6.1, "ASME Code and Addenda," the Bellefonte COL applicant states that this COL Item is addressed in Subsection 5.2.1.1, but does not discuss the implementation of the AP1000 provisions in Subsection 5.2.6.1. Discuss the implementation of the AP1000 provisions specified in Subsection 5.2.6.1.

BLN RAI: 599

BLN Response:

As indicated in the response to Bellefonte Combined License Application – Response to Request for Additional Information, NRC letter No. 24 – Code Compliance, RAI No. 05.02.01.01-1, dated July 3, 2008, there is no intent to specify portions of ASME Code, Section III, editions and addenda, approved subsequent to those identified in the certified AP1000 design. Also, as indicated in the response to Bellefonte Combined License Application – Response to Request for Additional Information, NRC letter No. 51 – Code Compliance, RAI No. 05.02.01.01-4, there are no additional code cases for design and construction beyond those identified in the DCD. FSAR Subsection 5.2.1.1 will be revised as indicated in the two RAI response letters identified above; no additional changes are required.

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

ASSOCIATED BLN COL APPLICATION REVISIONS

COLA will be revised as shown in the above identified associated RAI responses.

ATTACHMENTS/ENCLOSURES

None

NRC Letter Dated: June 25, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER 05.02.01.02-02

AP1000 DCD Revision 16, Section 5.2.1.2 indicates that use of Code Cases approved in revisions of the Regulatory Guides issued subsequent to the Design Certification may be used as discussed in subsection 5.2.6.1 by the Combined License applicant using the process outlined for updating the ASME Code edition and addenda, and Section 5.2.6.1 states that the Combined License applicant will address in its application the addition of ASME code cases approved subsequent to design certification. Similar to the Section III Code Cases listed in DCD Table 5.2-3, provide a list of Section XI inservice/inspection and the Operation and Maintenance (OM) Code Cases that are used for Bellefonte design and construction. Confirm whether these Code Cases are approved by NRC as documented in Regulatory Guides (RG) 1.147 and 1.192. If not, these Code Cases must be submitted to NRC for authorization pursuant to 10CFR50.55a(a)(3).

BLN RAI: 600

BLN Response:

As indicated in the response to Bellefonte Combined License Application – Response to Request for Additional Information, NRC letter No. 51 – Code Compliance, RAI No. 05.02.01.01-04, there are no additional Code Cases used for design and construction beyond those identified in the DCD. In addition, no ASME Section XI inservice/inspection code cases or ASME Operation and Maintenance (OM) Code cases have been identified as necessary for design and construction. FSAR Subsection 5.2.4.1 discusses the use of ASME Code Case N-729-1 as modified by the NRC Staff Position, included in an attachment to a letter from John A. Globe, NRC, to James H. Riley, NEI, dated August 9, 2006, to perform the inspection of the AP1000 reactor pressure vessel head. The IST Program described in FSAR Subsection 3.9.6 will utilize Code Case OMN-1, Revision 1, "Alternative Rules for the Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light Water Reactor Power Plants." Code Case OMN-1 establishes alternate rules and requirements for preservice and inservice testing to assess the operational readiness of certain motor operated valves.

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

ASSOCIATED BLN COL APPLICATION REVISIONS

COLA will be revised as shown in the above identified associated RAI response.

ATTACHMENTS/ENCLOSURES

None