



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

October 3, 2008

10 CFR 52.80

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

In the Matter of) Docket Numbers 52-014 and 52-015
Tennessee Valley Authority)

BELLEFONTE COMBINED LICENSE APPLICATION – ADDITIONAL INFORMATION REGARDING CONSIDERATION OF BELLEFONTE UNITS 1 AND 2 AS A POTENTIAL POWER GENERATION ALTERNATIVE IN THE APPLICANT’S ENVIRONMENTAL REPORT – COMBINED LICENSE STAGE FOR UNITS 3 AND 4

- References:
1. Letter from Mr. Ashok S. Bhatnagar (TVA) to Mr. R. William Borchardt, NRC, “Application for Combined License for Bellefonte Units 3 and 4,” dated October 30, 2007 [ML073110527].
 2. Letter from Ashok S. Bhatnagar (TVA) to NRC Document Control Desk, “Tennessee Valley Authority (TVA) – Bellefonte Nuclear Plant Units 1 and 2 – Request to Reinstate Construction Permits CPPR-122 (Unit 1) and CPPR-123 (Unit 2),” dated August 26, 2008 [ML082410087].

This letter provides additional information regarding the consideration of Bellefonte Units 1 and 2 as a potential power generating option. The information in Enclosure 1 to this letter will be included in Revision 1 to the Bellefonte Nuclear Plant Units 3 and 4 Applicant’s Environmental Report – Combined License Stage (ER) in satisfaction of the commitment made in the Tennessee Valley Authority’s (TVA) August 26, 2008 request to reinstate the Units 1 and 2 Construction Permits (Reference 2).

By letter dated October 30, 2007 (Reference 1), TVA submitted a combined license application (COLA) for the two AP1000 advanced passive pressurized water reactors identified as Bellefonte Nuclear Plant, Units 3 and 4. As discussed in the BLN COLA, these two nuclear units would be located on the same site as the partially completed Units 1 and 2. The construction permits for Units 1 and 2 were withdrawn by the NRC in September 2006, at TVA’s request, following TVA’s determination that completion of these two deferred nuclear units was not a cost-effective generating option.

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Recently, however, in response to a change in power generation economics over the past few years and the possible effects of constraints on the availability of the worldwide supply of components necessary for new generation development, TVA has opted to re-evaluate whether Bellefonte Units 1 and 2 should be a viable generating alternative. In order to perform this evaluation, TVA seeks to establish the regulatory framework and licensing basis upon which these two units could be completed should TVA later determine to commence construction of Units 1 and 2. To initiate this evaluation, by letter dated August 26, 2008 (Reference 2), TVA submitted a request to reinstate the Construction Permits for Bellefonte Nuclear Plant, Units 1 and 2. TVA's request included a commitment to provide additional information about Units 1 and 2 as a potential power generating alternative in Revision 1 to the BLN COLA Environmental Report. The enclosure to this letter provides the additional information, in the form of red-lined/strike-out ER changes, in resolution to this commitment. These ER changes will be incorporated in Revision 1 to the BLN COLA Environmental Report.

Neither TVA's request nor NRC's approval of TVA's request to reinstate the Construction Permits for Bellefonte Units 1 and 2 affects, in any way, TVA's ability or current plans to pursue a Combined License for Bellefonte Units 3 and 4 under 10 CFR Part 52.

Because reinstatement would not represent a decision to actually proceed with the continued construction of Units 1 and 2, the licensing information previously submitted to the NRC for the purpose of supporting the COLA for Bellefonte Units 3 and 4 would remain valid. Nor should TVA's request for or NRC's reinstatement of the Construction Permits be construed as a determination that Bellefonte Units 1 and 2 represent a viable generating alternative. The entire purpose for reinstating the Construction Permits for Units 1 and 2 would be to assist TVA in determining whether these units should once again constitute a viable, or in terms of NEPA requirements, whether they should represent a "reasonable" power generating alternative.

If you should have any questions, please contact Thomas Spink at 1101 Market Street, LP5A, Chattanooga, Tennessee 37402-2801, by telephone at (423) 751-7062, or via email at tespink@tva.gov.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd day of Oct, 2008.



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

Enclosure: Environmental Report Changes Related to Consideration of Bellefonte Units 1 and 2 as a Potential Generating Option

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ENCLOSURE

ENVIRONMENTAL REPORT CHANGES RELATED TO CONSIDERATION OF
BELLEFONTE UNITS 1 AND 2 AS A POTENTIAL GENERATING OPTION

**ENVIRONMENTAL REPORT CHANGES
RELATED TO CONSIDERATION OF
BELLEFONTE UNITS 1 & 2
AS A POTENTIAL GENERATING OPTION**

TVA Letter Dated: October 3, 2008

Environmental Report Changes Related to

Consideration of Bellefonte Units 1 and 2 as a Potential Generating Option

This enclosure provides additional information related to the consideration of Bellefonte Units 1 and 2 as a potential generation option to the preferred option presented in the Bellefonte Nuclear Plant, Units 3 and 4 (BLN) Applicant's Environmental Report – Combined License Stage (ER). Additions to the ER text are shown in blue, underlined text, and deletions are shown in red, strike-out text. These changes are consistent with the information provided in TVA's referenced request to reinstate the construction permits for Bellefonte Units 1 and 2, dated August 26, 2008.

Reference:

Letter from Ashok S. Bhatnagar (TVA) to NRC Document Control Desk, "Tennessee Valley Authority (TVA) - Bellefonte Nuclear Plant Units 1 and 2 – Request to Reinstate Construction Permits CPPR-122 (Unit 1) and CPPR-123 (Unit 2)," dated August 26, 2008 [ML082410087].

BLN COL APPLICATION TEXT CHANGES:

1. Change COLA Part 3, ER Chapter 1, Section 1.1, The Proposed Project, 9th paragraph, as follows:

The Applicant was issued a construction permit for Bellefonte Units 1 and 2 by the Atomic Energy Commission (now the NRC) in December 1974. By 1988, Unit 1 was 90 percent complete, and Unit 2 was 57 percent complete. On July 29, 1988, the TVA notified the NRC that completion of construction of Bellefonte Units 1 and 2 was being deferred. A lower-than-expected load forecast was the reason for deferral. At the TVA's request, the construction permit was terminated by the NRC in September 2006. TVA is now taking preliminary steps to consider whether Bellefonte Units 1 and 2 should again be regarded as a potential baseload generating option, due in large part to the change in power generation economics since 2005. In August 2008, TVA submitted a letter to NRC requesting reinstatement of the construction permit for Bellefonte Units 1 and 2. Having the permit in place once again would allow TVA to establish, with a relative degree of certainty, the regulatory framework and licensing basis that would be used in considering the viability of completing the units. Detailed descriptions of the existing site, buildings, structures, systems, and operations are provided in the licensing documents for the plant.

2. Change COLA Part 3, ER Chapter 2, Subsection 2.5.5, Noise, 1st paragraph, as follows:

The partially constructed Bellefonte Units 1 and 2 are unoccupied except for a crew of approximately three to eight TVA employees who preserve the perform asset recovery from any further degradation. Noise generated from these activities is limited to traffic entering and exiting the facility and the occasional use of equipment such as fork-lifts, trucks, and other maintenance vehicles. In August 2008, TVA requested that the construction permits for Bellefonte Units 1 and 2 be reinstated. If NRC reinstates the permits, TVA would conduct minor refurbishment of the existing Construction Administration Building (CAB), as well as reinstating preventive maintenance, testing, and monitoring activities at the site. Other noise generated on site is from natural sources such as wind through foliage, wildlife, and insects. Noise generated from nearby off-site sources include new home construction (location number 15), residential activities (location 18), business operational noise (location 30), traffic along the southwest and northern perimeter of the site, and aquatic vehicles (boats, barges, personal water-craft, etc.) along the Tennessee River and Town Creek (Figure 2.5-29).

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3. Change COLA Part 3, ER Chapter 4, Subsection 4.3.2, Aquatic Ecosystems, 2nd paragraph, as follows:

The intake structure, discharge structure, and transmission lines were initially constructed with Bellefonte Units 1 and 2 ~~before being abandoned~~. These structures are to be utilized for Units 3 and 4, thus reducing construction in the water.

4. Change COLA Part 3, ER Chapter 9, Section 9.2, Energy Alternatives, 4th through 6th paragraphs, as follows:

In that review, TVA considered a broad range of supply-side and customer service options, using multiple evaluation criteria, considering future uncertainties, and seeking public input. TVA created an extensive list of generating options (7-6A, 6B, 6C, and 6D of the IRP) to meet new peaking, intermediate, baseload, and storage power supply needs. These options included traditional technologies (such as coal plants, nuclear plants, and combustion turbines), as well as potential renewable and advanced combustion facilities; options to create greater flexibility (Figure 7-6E of the IRP) in planning (such as purchasing of competitively priced power from other suppliers, buying options on future power delivery, and entering business partnering arrangements). Overall TVA considered over 100 supply-side resource options. The IRP also considered over 60 customer service options for demand-side management (i.e., energy efficiency and load management). The resource integration plan evaluated over 2000 strategies using various mixes of supply-side and customer service options. From an extensive series of iterative evaluations, seven strategies emerged that met demand for power and offered TVA low-cost, lower debt, improved environmental and economic development performance, as well as providing hedges against key uncertainties, namely load growth, natural gas prices, possible environmental regulations for air and water, and nuclear performance. These strategies involving both supply and demand side management options were further evaluated in the IRP EIS.

TVA's preferred option identified in that Final EIS was a portfolio of options drawn from the seven key strategy alternatives. The IRP has provided TVA with a flexible energy supply plan that has subsequently helped guide the strategic actions necessary for TVA to develop needed capacity and to serve its customers efficiently in providing reliable power to the TVA Power Service Area.

Practical alternatives to the BLN project (i.e., construction and operation at the Bellefonte site of two Westinghouse AP1000 nuclear reactors with a net electrical output of 2234 MW) that do not require new generating capacity are discussed in Subsection 9.2.1, and those that do require development of new capacity are discussed in Subsection 9.2.2. As discussed in Subsection 9.2.2, some of the alternatives that require new generating capacity were eliminated from further consideration based upon their lack of availability in the region, overall feasibility, inability to supply baseload power, or environmental consequences. The alternatives that were not so eliminated are discussed in further detail in Subsection 9.2.3. The practical alternatives to the BLN project for energy sources discussed in Subsection 9.2.3 constitute reasonable, practical energy options that are also bounded and drawn from among the suite of options evaluated in the TVA IRP.

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Environmental Report Changes Related to

Consideration of Bellefonte Units 1 and 2 as a Potential Generating Option

5. Change COLA Part 3, ER Chapter 9, Subsection 9.2.1.2, Reactivating or Extending Service Life of Existing Plants, as follows:

9.2.1.2 Repowering, Reactivating, Upgrading, or Extending Service Life of Existing Plants

Electric utilities in general have given considerable attention to the issue of repowering ~~non-~~~~nuclear~~ generating facilities. Repowering is the process by which utilities update or change the technology of existing plants to realize gains in efficiency or output not possible at the time of the plant's construction. Typically, ~~Candidates~~ candidates for repowering would be fueled by coal or natural gas, and the environmental impacts are bounded by the coal- and natural gas-fired alternatives evaluated in Subsection 9.2.2. TVA currently has no existing plants available for repowering, nor does it have any plans at this time to reactivate any once-operating, but now closed, generating facilities.

~~The history for terminating the construction permit for Bellefonte Units 1 and 2 is documented in Section 1.1. Since construction ceased on Units 1 and 2, these partially completed units have been in asset recovery, and many of the major components have been removed, or partially dismantled and sold, thereby rendering completion of Units 1 and 2 economically and technologically impractical. TVA currently has no firm plans for retiring any of its generating units. TVA is adding environmental controls and maintaining existing generating units as necessary to keep them operational and in compliance with environmental requirements.~~

~~Reactivation, license renewal, and power uprates of other nuclear plants could be a potential alternative source of electricity. As of 2006, TVA is the owner and operator of the Browns Ferry, Sequoyah, and Watts Bar nuclear power plants. The power uprate and licensing status of these plants is shown in Table 9.2-1 (Reference 2). The need for power analysis in Chapter 8 reflects the additional electricity that would be provided by any approved or planned power uprates and 20-year license renewal of these current plant licenses. After completing an environmental review and a detailed feasibility, financial, and engineering study, TVA has announced plans to complete Watts Bar 2, located near Spring City, Tennessee. Work on Watts Bar 2 was about 50 percent complete when the project was halted in 1985. Extending the life of existing plants (whether nuclear or fossil fuel) would result in the continued environmental impact attributable to operation of the plants. As explained in Subsection 9.2.3, operation of fossil fuel plants is not environmentally preferable to BLN.~~

~~This analysis assumes continued power generation from the existing TVA nuclear plants. The continued operation of a nuclear power plant would avoid the environmental impacts related to construction of a new plant. However, continued operation of an existing nuclear plant does not provide additional generating capacity, and the uprate in power is already factored into the need for power analysis.~~

~~Extending the life of existing plants (whether fossil fuel or nuclear) would result in the continued environmental impact attributable to operation of the plants. As explained in Subsection 9.2.3, operation of fossil fuel plants is not environmentally preferable to BLN.~~

After completing an environmental review and a detailed feasibility, financial, and engineering study, TVA has resumed construction activities and plans to complete the construction of Watts Bar-2, located near Spring City, Tennessee. Work on Watts Bar-2 was estimated to be about 60 percent complete at the time of construction reactivation, and

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current plans are to begin commercial operation in 2012. The need for power analysis in Chapter 8 reflects the additional electricity that would be provided by Watts Bar-2.

In addition to the above nuclear power plants, TVA has two partially completed units at the Bellefonte site. As described in Section 1.1, TVA received construction permits for Bellefonte Units 1 and 2 in 1974. The history of withdrawal of the construction permits for Bellefonte Units 1 and 2 in 2006 is documented in Section 1.1. In the time since the construction permits were withdrawn, some investment recovery activities have taken place and several components have been removed or partially dismantled and sold. Asset recovery activities have ceased, and TVA is now taking preliminary steps to consider whether Bellefonte Units 1 and 2 should once again be regarded as a potential baseload generating option, due in large part to the change in power generation economics since 2005.

In August 2008, TVA submitted a letter to the NRC requesting reinstatement of the construction permits for Bellefonte Units 1 and 2. If such permits are reinstated, TVA will place the units in deferred status pursuant to the NRC's Policy Statement on Deferred Plants, 52 Fed. Reg. 38077 (October 14, 1987). Among other things, TVA would then conduct a licensing assessment in which it would seek to establish, with some relative degree of certainty, the regulatory framework that would be used should TVA decide to complete the units.

In arriving at this framework, TVA anticipates communicating with the NRC to establish the key regulatory assumptions underlying the potential completion of the units as well as the regulatory framework for completing any subsequent construction and licensing activities. TVA considers this framework as critical to determining the viability of this potential alternative, because the cost and schedule for completion could vary dramatically depending on the final determination of how the regulatory requirements are to be met. In addition to the licensing assessment, TVA would also conduct engineering, design, and equipment reviews. Using the sum of this information, TVA would be in a position to best determine whether completing the units would constitute a viable generating alternative. Bellefonte Units 1 and 2 are described in Subsection 9.2.2.12.

In summary, TVA has no firm plans to retire existing generating plants, and has taken or is taking will take actions to extend the licenses of its operating nuclear fleet units and to uprate existing plants units to the extent reasonable to do so. It is also completing construction of another nuclear unit, and it has taken these plans into account in determining that there is a need for additional power. Furthermore, continued operation of fossil fuel plants has environmental impacts on air quality that would exceed those of BLN associated with new nuclear generation. Therefore, reactivating or extending the service life of existing fossil plants is not a reasonable alternative as a means of satisfying TVA's need for additional power. Completion of the partially constructed Bellefonte Units 1 and 2 is discussed as an alternative for providing new generating capacity in Section 9.2.2, although this option is not considered a viable alternative at this time.

6. Change COLA Part 3, ER Chapter 9, Subsection 9.2.2, Alternatives Requiring New Generating Capacity, by changing the 1st and 3rd paragraphs, as follows:

This subsection discusses the use of reasonable alternatives requiring new generating capacity that could substitute for the capacity expected from the new nuclear facility technology option (e.g. Westinghouse AP1000 reactors) considered for the BLN site. This

subsection, as a starting point, considers (1) alternatives not yet commercially available, (2) fossil fuel-fired generation ~~and~~, (3) partially completed nuclear units, and (4) alternatives uniquely available within the region to be served by the BLN.

While the need for power is discussed in this report, for the purposes of this evaluation, it is presumed that there would be a demand for the power at the time a COL application is submitted to the NRC. -For the future period considered, numerous uncertainties arise from the expected available technology levels, operational and environmental performance, and related costs. -It is presumed similar to Subsection 9.2.1 that sufficient knowledge is available at this time to make reasonable comparisons of the alternatives.

NUREG-1437 represents a useful spectrum of alternative source analyses. The focus of NUREG-1437 is on the environmental effects of extended operation of a wide variety of permitted and/or licensed nuclear plants, including such types as Bellefonte Nuclear Plant Units 1 and 2. In ~~this document~~ NUREG-1437, the NRC also calculated alternatives, with using commonly known generation technologies, and researched various states' energy plans to identify alternative generation sources typically being considered. Although NUREG-1437 is specific to license renewal, the document's alternatives analyses ~~in it~~ can be applied to determine if the alternative technology represents a reasonable alternative to the proposed action and satisfies the intent and requirements of 10 CFR Part 52 regarding a COL application.

7. Change COLA Part 3, ER Chapter 9, by adding a new Subsection 9.2.2.12, Partially Completed Nuclear Power Plant, as follows:

9.2.2.12 Partially Completed Nuclear Power Plant

Nuclear generation accounts for approximately 30 percent of the electricity generated by TVA, 20 percent of all the electricity generated in the United States, and 16 percent of the electricity generated worldwide. TVA's nuclear power supply comes from its three nuclear plants: Browns Ferry (BFN, 3 units), near Athens, Alabama; Sequoyah (SQN, 2 units), in Soddy-Daisy, Tennessee; and Watts Bar (WBN, 1 unit in operation, 1 under construction), near Spring City, Tennessee. These plants represent about 6900 MW of TVA's electric capacity, and produce enough electricity to power more than three million homes in the Tennessee Valley. Sixty-nine of the 104 fully licensed U.S. nuclear power plants are pressurized-water reactors (PWRs), including TVA's Sequoyah and Watts Bar nuclear plants.

In addition to the units at Watts Bar and Sequoyah nuclear plants, TVA has two partially completed pressurized water reactor units at the BLN site. As described in the Bellefonte Units 1 and 2 FSAR, these units are 205 Babcock & Wilcox (B&W) designed reactors with a design net output of 1230 MWe each. The designation "205" refers to the number of fuel assemblies in the reactor core. The operating B&W plants in the United States are "177" plants. However, the 205 design is essentially a B&W 177 design plant with a larger core, and therefore not a unique design to NRC. A standard Safety Analysis Report (B-SAR-205) describing the B&W 205 design is on file with the NRC. The uranium fuel cycle described in Chapter 5 of this ER for Units 3 and 4 would also be applicable to Units 1 and 2, as would be the availability of uranium for nuclear fuel as described in Section 10.2.2.4.

The existing components of Units 1 and 2 are illustrated in Figure 2.1-1, and noted in the Building Legend as items 3, 6, 7, 10, 12, 15, 19, and 24. The transmission lines built to

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support Units 1 and 2 are in place. As described in Subsection 2.2.2, both 500-kV and 161-kV lines run into and out of the BLN site (illustrated in Figure 1.1-5). Construction power for Units 1 and 2 would be supplied by the existing 161-kV line.

As described in Section 1.1, TVA was issued construction permits for Bellefonte Units 1 and 2 by the Atomic Energy Commission in December 1974. Construction of Units 1 and 2 continued until the mid-1980s when forecasted load growth began to decrease. Given the additional generating capabilities from TVA's completed generating facilities, the diminished demand for electrical power, and financial considerations, including the goal of holding electric rates constant, TVA decided to defer completion of the Bellefonte units. At that time, Unit 1 was approximately 90 percent complete, and Unit 2 was approximately 58 percent complete.

In 2005, TVA determined that completing Units 1 and 2 would not be a cost-effective generating option and could no longer be economically justified. However, it was recognized that, if Units 1 and 2 are not completed and operated, some of the existing Unit 1 and Unit 2 equipment and structures (e.g., cooling towers, intake structure, transmission switch yards) could be used to support a new facility, and that their use could reduce new construction costs associated with an advanced technology nuclear plant to be licensed utilizing the improved combined licensing process described in 10 CFR Part 52. This proposed plant, which utilizes the Westinghouse AP1000 Design Certification Document, was eventually designated as Bellefonte Units 3 and 4.

In 2006, TVA requested that the NRC withdraw the construction permits for Units 1 and 2, and submitted a Site Redress Plan to the NRC along with the withdrawal request. The permits were withdrawn by the NRC in 2006. However, TVA has maintained the site's National Pollutant Discharge Elimination System permit, Air Permit for Synthetic Minor Source Operation for two 7000 kW diesel generators, and the applicable Resource Conservation and Recovery Act permit.

Since TVA made the decision to request withdrawal of the BLN Units 1 and 2 construction permits, the cost per kilowatt of installed capacity among generation alternatives has continued to increase. In addition, the worldwide decrease in the number of suppliers available for providing necessary reactor components and the significant expression of interest in developing new nuclear generation capacity in the past 2 years creates potential additional cost and schedule impacts on new construction. Also, many major Unit 1 and 2 structures, systems, and components are near completion, including the containment buildings, cooling towers, circulation water buildings, most major and minor Unit 1 systems, and some Unit 2 systems. In terms of commodities, these structures, systems, and components represent considerable amounts of installed concrete, steel, piping, and cable, all of which have significantly increased in cost over the past few years. For the reasons listed above, in a letter dated August 26, 2008, TVA asked the NRC to reinstate the construction permits for Units 1 and 2. If the permits are reinstated, TVA intends to place the units in deferred plant status.

In the time since the construction permits were withdrawn, some investment recovery activities have taken place at the site; however these activities were halted in November 2007. If NRC reinstates the construction permits for Bellefonte Units 1 and 2 in a deferred status, TVA anticipates conducting minor refurbishment of the Construction Administration Building (CAB), as well as reinstating certain preventive maintenance, testing, and monitoring activities at the site.

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Consideration of Bellefonte Units 1 and 2 as a Potential Generating Option

Environmental studies conducted over the years addressing the completion of Units 1 and 2 include TVA's 1974 Final Environmental Statement (Reference 9), the AEC's 1974 Final Environmental Statement (Reference 10), and the Final Environmental Impact Statement on the BLN Conversion Project (Reference 5), as well as the U.S. Department of Energy's Final Environmental Impact Statement on the Production of Tritium in a Commercial Light Water Reactor (Reference 11).

In view of the above, TVA has determined that it is prudent and worthwhile to examine the viability of adding Bellefonte Units 1 and 2 as a baseload generation source. However, determination of the viability of completing Units 1 and 2 will depend, in part, on the results of a licensing assessment that will be performed. TVA has requested that the original construction permits for these units be reinstated to allow TVA to establish, with some relative degree of certainty, the regulatory framework that would be applied should TVA decide to complete the units. The viability of this completion option will not be known until completion of the licensing assessment as well as a review of the engineering, design, and equipment that would be required to complete the units, as well as consideration of intangible factors such as the desirability of the resulting technology.

Should NRC reinstate the construction permits in a deferred status, TVA would resume preservation and maintenance activities as appropriate under NRC regulations and Generic Letter 87-15, "Policy Statement on Deferred Plants." TVA would maintain the units in the same deferred status as when TVA elected to withdraw the construction permits.

In making the subject request for reinstatement of the construction permits, TVA has not indicated any preference or prejudice in favor of completing the existing Bellefonte units. Should NRC reinstate the construction permits, any future decision to resume Units 1 and 2 construction and completion activities would require approval by the TVA Board. TVA's Board would take into account the full range of engineering, construction, environmental, and regulatory/licensing considerations associated with such a project, including the associated cost and need for power considerations. In addition, should the TVA Board later decide to move forward with the completion of Bellefonte Units 1 and 2, TVA would follow the notice of resumption of construction directions included in the NRC's Deferred Plant Policy.

In summary, TVA has requested that the construction permits for Bellefonte Units 1 and 2 be reinstated to enable TVA to evaluate whether completion of Units 1 and 2 is a viable option. Pending completion of this evaluation, there is no basis for concluding that completion of Units 1 and 2 is a reasonable alternative to the BLN project. Therefore, this alternative is not considered further.

8. Change COLA Part 3, ER Chapter 9, Subsection 9.2.5, by adding new References 9 through 11, as follows:

9. Tennessee Valley Authority, *Final Environmental Statement – Bellefonte Nuclear Plant, Units 1 and 2*, May 1974.

10. Atomic Energy Commission, *Final Environmental Statement Related to Construction of Bellefonte Nuclear Plant Units 1 and 2*, June 1974.

11. U.S. Department of Energy, *Final Environmental Impact Statement for the Production of Tritium in a Commercial Light Water Reactor*, DOE/EIS-0288, March 1999.

9. Change COLA Part 3, ER Chapter 9, Table 9.2-1, by adding table entries for Bellefonte Units 1 and 2, as follows:

TABLE 9.2-1 TVA NUCLEAR PLANT STATUS

Plant	Full Power Operating License Issued	License Extension Applied For	Current License Expiration	Power Uprate Status		
				% Uprate	MWt	Date Approved
Browns Ferry 1	1973	Y	2033	5	165	03/06/07
Browns Ferry 2	1974	Y	2034	5	164	09/08/98
Browns Ferry 3	1976	Y	2036	5	164	09/08/98
Sequoyah 1	1980	N	2020	1.3	44	04/30/02
Sequoyah 2	1981	N	2021	1.3	44	04/30/02
Watts Bar 1	1996	N	2035	1.4	48	01/19/01
Watts Bar 2 (not operating)	na ^(a)	na	40-year initial period	na	na	na
<u>Bellefonte 1</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>
<u>Bellefonte 2</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>	<u>na</u>

(a) na = Not applicable.

10. Change COLA Part 3, ER Chapter 9, Subsection 9.4.1.2, 4th paragraph, as follows:

TVA requested termination of the construction permits for the Bellefonte Units 1 and 2 (Reference 8). The NRC approved the TVA's request to terminate the construction permits for the unfinished Bellefonte Units 1 and 2 (Reference 9). However, during the NRC's review, as well as in the subsequent TVA request for the reinstatement of the construction permits for Units 1 and 2, TVA stated it intends to continue using existing environmental permits at the site, as well as, maintain major plant components such as water intake and discharge facilities, cooling towers and transmission switchyards. TVA has identified use of the existing NDCTs and water intake and discharge facilities for BLN Units 3 and 4 as preferable.