

October 16, 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 – QUALITY ASSURANCE

- Reference: 1) Letter from Brian C. Anderson (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 016 Related to SRP Section 17.5 for the Bellefonte Units 3 and 4 Combined License Application, dated May 12, 2008
 - 2) Letter from Andrea L. Sterdis (TVA) to Document Control Desk (NRC), Response to Request for Additional Information – Quality Assurance, dated June 24, 2008

This letter provides the Tennessee Valley Authority's (TVA) revised response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) item included in the reference letters. This revised response to RAI 17.05-16 is submitted as requested by the NRC following verbal clarifications of the requested information.

A supplemental response to the 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 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 / day of day of . 2008.

Andrea L. Sterdis

Manager, New Nuclear Licensing and Industry Affairs

Nuclear Generation Development & Construction

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Enclosure

cc: See Page 2

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cc: (w/Enclosure)

- B.C. Anderson/NRC/HQ
- J. P. Berger, EDF
- E. Cummins, Westinghouse
- S. P. Frantz, Morgan Lewis
- M.W. Gettler, FP&L
- R. C. Grumbir, NuStart
- P. S. Hastings, NuStart
- P. Hinnenkamp, Entergy
- B. Hughes, NRC/HQ
- M. C. Kray, NuStart
- D. Lindgren, Westinghouse
- G. D. Miller, PG&N
- M. C. Nolan, Duke Energy
- N. T. Simms, Duke Energy
- K. N. Slays, NuStart
- G. A. Zinke, NuStart

cc: (w/o Enclosure)

- M. M. Comar, NRC/HQ
- R. G. Joshi, NRC/HQ
- R. H. Kitchen, PGN
- M. C. Kray, NuStart
- A. M. Monroe, SCE&G
- 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 October 16, 2008 RAI Response

Response to NRC Request for Additional Information letter No. 016 dated May 12, 2008 (2 pages, including this list)

Subject: Quality Assurance in the Final Safety Analysis Report

RAI Number	Date of TVA Response
17.05-13	June 24, 2008
17.05-14	June 24, 2008
17.05-15	June 24, 2008
17.05-16	June 24, 2008 Supplemented by this letter – see following page; supplemental information provided in this letter replaces the original response in its entirety.
17.05-17	June 24, 2008
17.05-18	June 24, 2008

Attachments / Enclosures

Pages Included

None

Enclosure TVA letter dated October 16, 2008 RAI Response

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-16

Appendix 1AA of the Bellefonte FSAR lists Bellefonte's conformance with NRC Regulatory Guides (RGs) and provides any exceptions to conformance with those RGs. For those RGs that describe quality assurance-related requirements, Appendix 1AA appears to address the conformance of the QAPD provided in Part 11 of the COL application. However, since TVA is relying on its existing quality assurance program for activities prior to COL issuance, please explain how Appendix 1AA also addresses the existing TVA quality assurance program's conformance to the applicable RGs.

BLN RAI ID: 1969 BLN RESPONSE:

As discussed in FSAR Section 17.1, TVA is responsible for the establishment and execution of quality assurance program requirements during the design and construction phases of Bellefonte Nuclear Plant Units 3 and 4 and controls those activities prior to the issuance of the COL under the "Tennessee Valley Authority Nuclear Quality Assurance Plan," (TVA-NQA-PLN89-A). TVA-NQA-PLN89-A addresses the Conformance Status of applicable Regulatory Guides in Appendix B of that document.

TVA also identifies in FSAR Section 17.1 that the "Quality Assurance Program Description" (QAPD) discussed in Section 17.5 will become effective at COL issuance. The QAPD discussed in Section 17.5 is the QAPD provided in Part 11 of the Bellefonte application.

TVA does not plan to perform or have performed any construction activities or safety-related design activities prior to receipt of the COL, with the exception of those activities related to support COLA review by the NRC, such as preparing responses to RAIs that may require additional analysis. For those activities, the only identified applicable quality assurance related Regulatory Guide is Regulatory Guide 1.28. The TVA Bellefonte Units 3 and 4 safety related design activities conducted under the program described in FSAR Section 17.1 are performed in conformance with Regulatory Guide 1.28, Revision 3.

This conformance will be included in FSAR Section 17.1 as shown in the Application Revisions section below.

This response is PLANT-SPECIFIC.

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 2, FSAR, Chapter 11, Section 17.1 will be revised to include the following after the fourth paragraph:

The TVA Bellefonte Units 3 and 4 safety related design activities conducted under the program described in FSAR Section 17.1 are performed in conformance with Regulatory Guide 1.28, Revision 3. This is the only identified applicable quality assurance related Regulatory Guide for the program in place prior to COL receipt.

ATTACHMENTS/ENCLOSURES:

None