



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

April 09, 2009

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

**BELLEVILLE COMBINED LICENSE APPLICATION – RESPONSE TO REQUEST FOR
ADDITIONAL INFORMATION – RELIABILITY ASSURANCE PROGRAM**

Reference: Letter from Manny Comar (NRC) to Andrea L Sterdis (TVA), Request for
Additional Information Letter No. 150 Related to SRP Section 17.4 for the
Belleville Units 3 and 4 Combined License Application, dated March 4, 2009

This letter provides the Tennessee Valley Authority's (TVA) response to the Nuclear Regulatory
Commission's (NRC) request for additional information (RAI) item included in the reference
letter.

A 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 9th day of April, 2009.

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

Enclosure
cc: See Page 2

DOB5
NRO

Document Control Desk

Page 2

April 09, 2009

cc: (Enclosure)

J. P. Berger, EDF
M. M. Comar, NRC/HQ
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
K. N. Slays, NuStart
G. A. Zinke, NuStart

cc: (w/o Enclosure)

B. C. Anderson, NRC/HQ
B. Hughes/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

Enclosure
TVA letter dated April 09, 2009
RAI Response

Response to NRC Request for Additional Information letter No. 150 dated March 4, 2009
(3 pages, including this list)

Subject: Reliability Assurance Program in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
17.04-02	This letter – see following pages

<u>Associated Additional Attachments / Enclosures</u>	<u>Pages Included</u>
None	

Enclosure
TVA letter dated April 09, 2009
RAI Response

NRC Letter Dated: March 4, 2009

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.04-02

(Follow-up to Question 17.04-01) Regulatory Guide 1.206, Section C.III.1, Subsection C.I.17.4.4, lists the information combined license (COL) applicants should submit related to their reliability assurance program (RAP). For example, COL applicants describe the quality controls for developing and implementing the RAP, how quality assurance requirements are implemented, and how RAP will be integrated into the applicant's existing operational programs.

The Bellefonte Units 3 and 4 Final Safety Analysis Report (FSAR) incorporates Section 17.4 of the AP1000 Design Control Document (DCD) by reference. However, this section of the DCD discusses the AP1000 organization and initial identification of risk-significant structures, systems, and components (SSC). While the program may be similar to that described for AP1000, the COL holder should impose its own program on its organization and contractors.

Using RG 1.206 as a guide, revise the FSAR to describe the organizational and process aspects of the RAP that will be performed by the COL holder (i.e., between the development of the design-specific program by the AP1000 organization and the initial fuel load).

BLN RAI ID: 3184

BLN RESPONSE:

Westinghouse has performed an evaluation of risk significant systems for inclusion in Design Reliability Assurance Program (D-RAP). The results of D-RAP evaluation are included in DCD Table 17.4-1, which identifies risk-significant SSCs within the scope of D-RAP. The generic PRA, as described by the certified design, includes all risk significant SSCs. The COL applicants evaluated this generic PRA to confirm its applicability to each site and to identify any deviations or departures. Based on this evaluation, it was concluded that the generic PRA is applicable to the COL applicant and therefore the risk significant SSCs identified by Westinghouse in the DCD establish the complete scope for D-RAP. There are no plant specific systems that are within the scope of D-RAP.

Quality assurance requirements for D-RAP are defined in the DCD and are incorporated by reference in the FSAR Chapter 17. In addition, FSAR Section 17.4 will be changed to invoke the applicable sections of the Quality Assurance Program Description to the non-safety related SSCs within the scope of D-RAP for activities conducted by the COL applicant prior to fuel load.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 2, FSAR, Chapter 17, Section 17.4 "Design Reliability Assurance Program" will be revised from:

This section of the referenced DCD is incorporated by reference with no departures or supplements.

Enclosure
TVA letter dated April 09, 2009
RAI Response

To read:

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

STD SUP 17.4-1 The quality assurance requirements for non-safety related SSCs within the scope of D-RAP is in accordance with the Quality Assurance Program Description (QAPD), Part III.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None