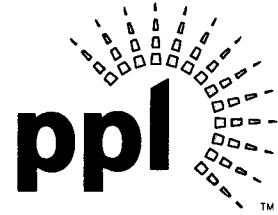


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June 09, 2009

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**BELL BEND NUCLEAR POWER PLANT  
RESPONSE TO RAI SET NO. 8  
BNP-2009-091      Docket No. 52-039**

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References: 1) M. Canova (NRC) to R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – Request for Information No. 8 (RAI No. 8) – SPLA-2604, email dated May 21, 2009

The purpose of this letter is to respond to the request for additional information (RAI) identified in the referenced NRC correspondence to PPL Bell Bend, LLC. This RAI addresses the Maintenance Rule, as discussed in Section 17.6 of the Final Safety Analysis Report (FSAR), as submitted in Part 2 of the Bell Bend Nuclear Power Plant Combined License Application (COLA).

The enclosure provides our response to RAI No. 8, Question 17.06-1, which includes revised COLA content. A Licensing Basis Document Change Request has been initiated to incorporate this change in a future revision of the COLA. This future revision of the COLA is the only new regulatory commitment.

The response to Question 17.06-1 is consistent with the R-COLA (CCNPP3) response to RAI 62, Question 17.06-1.

If you have any questions, please contact the undersigned at 570-802-8102.

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

Executed on June 09, 2009

Respectfully,

A handwritten signature in black ink that reads "Rocco R. Sgarro". The signature is written in a cursive style.

Rocco R. Sgarro

Enclosure: As stated

DOT 9  
NRD

cc: Mr. Samuel J. Collins  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
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Mr. Michael Canova  
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Enclosure 1

Response to NRC Request for Additional Information Set No. 8  
Bell Bend Nuclear Power Plant

## RAI Set No. 8

### Question 17.06-1

According to NEI 07-02A [Revision 0], "Generic FSAR Template Guidance for Maintenance Rule [MRule] Program Description for Plants Licensed under 10 CFR Part 52," dated March 2008 (which incorporates the NRC revised safety evaluation endorsing NEI 07-02), industry operating experience (IOE) should be applied to various elements of the MRule program and procedure. The MRule program should utilize IOE, where appropriate, for scoping, performance/condition criteria development, monitoring, goal-setting, corrective action, training, program assessment and maintenance and procurement activities.

Please revise Section 17.6 of the applicant's FSAR to include IOE and reflect conformance with NEI 07-02A guidance and its revised safety evaluation, or provide the rationale for excluding this information from the FSAR.

### Response

Section 17.X.4 of NEI 07-02A (Revision 0) includes a requirement to account for industry operating experience (IOE). Section 17.6 of the FSAR endorses the NEI guidance document by incorporating the NEI template by reference with supplements, including IOE from the maintenance rule. For clarity, the FSAR will be updated to clearly identify that the entire NEI guidance document template will be included in Section 17.7, Maintenance Rule Program.

Currently, FSAR Section 17.6 refers to Revision 3 of NEI 07-02. Revision 3 has been accepted by the NRC and has been incorporated into NEI 07-02A. FSAR Section 17.6 will be updated to reflect NEI 07-02A instead of NEI 07-02 Revision 3.

FSAR Table 1.6-1, "Reports Referenced" will be updated to reflect FSAR Section 17.7 and the appropriate revision date for the template. Table 13.4-1, "Operational Programs Required by NRC Regulations and Program Implementation" and Section 17.4 will also be updated to reflect FSAR Section 17.7 instead of 17.6.

### COLA Impact

Part 2, Final Safety Analysis Report (FSAR), of the Bell Bend COLA will be updated in a future COLA revision to incorporate the changes to FSAR Section 17.6 that are identified below:

#### **17.6 DESCRIPTION OF APPLICANT'S PROGRAM FOR IMPLEMENTATION OF 10 CFR 50.65, THE MAINTENANCE RULE**

This section of the U.S. EPR FSAR is incorporated by reference with the following supplements.

The U.S. EPR FSAR includes the following COL Item in Section 17.6:

A COL applicant that references the U.S. EPR design certification will describe the program for Maintenance Rule implementation.

This COL Item is addressed as follows:

The Maintenance Rule Program description included in NEI 07-02A, "Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part

52,” Revision 30, dated ~~September 2007~~ March 2008, (NEI, ~~2007~~2008) is incorporated by reference with supplements in Section 17.7.

~~The text of the template provided in NEI 07-02 is generically numbered as “17.X.” When the template is incorporated by reference into this FSAR, section numbering is changed from “17.X” to “17.6.”~~

~~Descriptions of the programs listed in Subsection 17.6.3 of NEI 07-02 are provided in the following FSAR Chapters/Sections:~~

- ~~• Maintenance rule program (Section 17.6).~~
- ~~• Quality assurance program (Section 17.5).~~
- ~~• Inservice inspection program (Sections 5.2 and 6.6).~~
- ~~• Inservice testing program (Section 3.9).~~
- ~~• Technical specifications surveillance test program (Chapter 16).~~
- ~~• Preventive Maintenance Program (Section 17.6).~~

#### **17.6.1 SCOPING PER 10 CFR 50.65(b)**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.1:

A COL applicant that references the U.S. EPR design certification will describe the process for determining which plant structures, systems, and components (SSC) will be included in the scope of the Maintenance Rule Program in accordance with 10 CFR 50.65(b).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Maintenance rule scoping per 10 CFR 50.65(b) is described in Section ~~17.6~~ 17.7.1.1.

#### **17.6.2 MONITORING PER 10 CFR 50.65(a)**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.2:

A COL applicant referencing the U.S. EPR design certification will provide a program description for monitoring SSC in accordance with 10 CFR 50.65(a)(1).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Monitoring and corrective action per 10 CFR 50.65(a)(1) is described in Section ~~17.6~~17.7.1.2.

The U.S. EPR FSAR includes the following COL Item in Section 17.6.2:

A COL applicant that references the U.S. EPR design certification will provide the process for determining which SSC within the scope of the Maintenance Rule Program will be tracked to demonstrate effective control of their performance or condition in accordance with paragraph 50.65(a)(2).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Preventive maintenance per 10 CFR 50.65(a)(2) is described in Section ~~47.6~~17.7.1.3.

### **17.6.3 PERIODIC EVALUATION PER 10 CFR 50.65(a)(3)**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.3:

A COL applicant that references the U.S. EPR design certification will identify and describe the program for periodic evaluation of the Maintenance Rule Program in accordance with 10 CFR 50.65(a)(3).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Periodic evaluation of monitoring and preventive maintenance per 10 CFR 50.65 (a) (3) is described in Section ~~47.6~~17.7.1.4.

### **17.6.4 RISK ASSESSMENT AND MANAGEMENT PER 10 CFR 50.65(a)(4)**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.4:

A COL applicant that references the U.S. EPR design certification will describe the program for maintenance risk assessment and management in accordance with 10 CFR 50.65(a)(4).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Risk assessment and risk management per 10 CFR 50.65 (a) (4) is described in Section ~~47.6~~17.7.1.5.

### **17.6.5 MAINTENANCE RULE TRAINING AND QUALIFICATION**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.5:

A COL applicant that references the U.S. EPR design certification will describe the program for selection, training, and qualification of personnel with Maintenance-Rule-related responsibilities consistent with the provisions of Section 13.2 as applicable.

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Maintenance rule training and qualification is described in Section ~~47.6~~17.7.2.

### **17.6.6 MAINTENANCE RULE PROGRAM ROLE IN IMPLEMENTATION OF RELIABILITY ASSURANCE PROGRAM (RAP) IN THE OPERATIONS PHASE**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.6:

A COL applicant referencing the U.S. EPR design certification will describe the relationship and interface between Maintenance Rule Program and the Reliability Assurance Program (refer to Section 17.4).

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Maintenance rule program relationship with reliability assurance activities is described in Section ~~17.6~~17.7.3.

#### **17.6.7**

#### **MAINTENANCE RULE PROGRAM IMPLEMENTATION**

The U.S. EPR FSAR includes the following COL Item in Section 17.6.7:

A COL applicant referencing the U.S. EPR design certification will describe the plan or process for implementing the Maintenance Rule Program as described in the COL application, which includes establishing program elements through sequence and milestones and monitoring or tracking the performance and/or condition of SSC as they become operational.

This COL Item is addressed as follows:

~~The Maintenance Rule Program~~ Maintenance rule program implementation is described in Section ~~17.6~~17.7.5.

#### **17.6.8 REFERENCES**

{This section is added as a supplement to the U.S. EPR FSAR.

NEI, ~~2007~~2008. Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, NEI 07-02A, Revision ~~30~~, Nuclear Energy Institute, ~~September 2007~~ March 2008. }

Part 2, Final Safety Analysis Report (FSAR), of the Bell Bend COLA will be updated in a future COLA revision to incorporate FSAR Section 17.7 as identified below:

**17.7**                    **Maintenance Rule Program**

This section is added as a supplement to the U.S. EPR FSAR.

The Maintenance Rule Program description included in NEI 07-02A, “Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, “ Revision 0, dated March 2008 is incorporated by reference. The text of the template provided in NEI 07-02A is generically numbered as “17.X.” The template is incorporated by reference into this FSAR Section by changing the numbering from “17.X” to “17.7.”

In Section 17.X.1.1.b of NEI 07-02A the “DRAP” (Reliability Assurance for the Design Phase) is defined to be located in FSAR “17.Y.” The DRAP is included in Section 17.4. The template is incorporated by reference into this FSAR section by changing the numbering from “17.Y” to “17.4.”

Descriptions of the programs listed in Subsection 17.X.3 of NEI 07-02A are provided in the following FSAR Chapters/Sections or Part 4:

- Maintenance rule program (Section 17.7).
- Quality assurance program (Section 17.5).
- Inservice inspection program (Sections 5.2 and 6.6).
- Inservice testing program (Section 3.9).
- Technical specifications surveillance test program (Part 4).
- Maintenance Programs (Section 13.5.2.2.6).

Part 2, FSAR, of the Bell Bend COLA will be updated in a future COLA revision to incorporate the changes to FSAR Table 1.6-1 that are identified below:

**Table 1.6-1—{Reports Referenced}**

Report	Title/Revision	Date Submitted to the NRC	FSAR Section
NEI 07-02A	Generic FSAR Template Guidance for Maintenance Rule Program Description for Plants Licensed Under 10 CFR Part 52, <del>Revision 3</del> Revision 0	March 2008	<del>17.6</del> 17.7



Part 2, FSAR, of the Bell Bend COLA will be updated in a future COLA revision to cross reference FSAR Section 17.7 instead of 17.6 in Table 13.4-1 Item 17, Maintenance Rule, as follows:

**Table 13.4-1—{Operational Programs Required by NRC Regulations and Program Implementation}**

Item	Program Title	Source (Required By)	FSAR	Implementation	
			Section	Milestones	Requirements
17	Maintenance Rule	10 CFR 50.65	<del>17.6</del> <u>17.7</u>	Prior to authorization to load fuel per 10 CFR 52.103(g)	10 CFR 50.65(a)(1)

Part 2, Final Safety Analyses Report (FSAR), of the Bell Bend COLA will be updated in a future COLA revision to cross reference FSAR Section 17.7 instead of 17.6, as follows:

Example Section ~~17.6~~ 17.7

This revision will be made in the following places:

- Section 17.4.4, page 17-6 second paragraph on page
- Section 17.4.4.4, page 17-13, three places first paragraph in this section
- Section 17.4.4.4.1, page 17-14 one place