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June 29, 2009

ATTN: Document Control Desk  
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Washington, DC 20555-0001

**BELL BEND NUCLEAR POWER PLANT  
RESPONSE TO RAI SET NO.13  
BNP-2009-110      Docket No. 52-039**

References: 1) M. Canova (NRC) to R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – Request for Information No. 13 (RAI No. 13) – ICE1-2013, email dated June 2, 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 (PPL). This RAI addresses the Instrumentation, Controls and Electrical Engineering, associated with access controls for safety systems, as discussed in Chapter 7 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. 13, Question 07.09-1.


The response to Question 07.09-1 is similar to the R-COLA (CCNPP3) response to RAI 39, Question 07.09-1.

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 29, 2009

Respectfully,

  
Rocco R. Sgarro

Enclosure: As stated

RRS/cw

D079  
NW

cc: (w/o Enclosures)

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Enclosure 1

Response to NRC Request for Additional Information Set No. 13  
Bell Bend Nuclear Power Plant

**Question 07.09-1**

Provide information regarding the access controls planned for the safety systems.

The applicant's FSAR incorporates by reference Chapter 7 of the U.S. EPR FSAR, "Instrumentation and Controls," without any departures. Section 7.1 of U.S. EPR FSAR references The AREVA NP Topical Report ANP-10272, "Software Program Manual for TELEPERM XS™ Safety Systems Topical Report." This topical report states that COL applicants will provide information regarding the control of access from outside the safety system and critical control systems. 10 CFR 50.55a(h) requires adherence to the requirements of IEEE 603-1991. IEEE 603-1991, Clause 5.9, requires that "The design shall permit the administrative control of access to safety system equipment. Describe the access controls planned for the safety systems.

**Response:**

Access control to critical control systems is discussed as part of the U.S. EPR design certification in Appendix B of ANP-10295, "AREVA NP U.S. EPR Security Features Technical Report," December 2008. Additional information was previously provided in an AREVA response to NRC dated January 24, 2008. The detailed information requested is either Safeguards Information (SGI) which is restricted from public release under 10 CFR 73.21 or Security Sensitive Information (SSI) which is restricted from public release under 10 CFR 2.390. The information may be found at:

- ANP-10295 Rev 0 Appendix B Section B.1, page B-2 paragraph 3 (SGI)
- ANP-10295 Rev 0 Appendix B Section B.3, page B-9 paragraph 3 (SGI)
- ANP-10295 Rev 0 Appendix B Section B.7, page B-15 (SGI)
- Letter from Ronnie Gardner to NRC dated January 24, 2008, page A-17 (SSI)

The BBNPP FSAR Section 13.6, Physical Security Plan (SGI), and Security Assessment (SGI) provide additional programmatic information on the physical access controls for the secured area of BBNPP.

The Topical Report referenced in RAI Question 07.09-1, AREVA NP Topical Report ANP-10272, "Software Program Manual for TELEPRM XSTM Safety Systems Topical Report" has been previously been docketed. The accession number is ML091050576.

**COLA Impact:**

No changes to the COLA are required.