PMBelCOL PEmails

From: Spink, Thomas E [tespink@tva.gov]
Sent: Monday, July 13, 2009 1:04 PM
To: Comar, Manny; Sebrosky, Joseph
Cc: Sterdis, Andrea Lynn; Eddie.Grant@excelservices.com; erg-xl@cox.net; Ryan, William T III
Subject: Courtesy email copy of TVA's Response to RAI Letter 16 Supplement 2 - Quality Assurance
Attachments: BLN RAI Response to RAI Letter 016 S2 final 20090713.pdf

Manny,

I have enclosed a PDF copy of our response to RAI Letter 16 Supplement 2 with this email as a courtesy. As always, the official submittal has been submitted to the Document Control Desk via paper copy using Federal Express services. The paper copy should arrive on July 14, 2009.

If you have any questions, please do not hesitate to call me.

Thomas E. Spink
Licensing Project Manager
Nuclear Generation Development
1101 Market Street, LP 5A
Chattanooga, TN 37402
423-751-7062; FAX (423) 751-6509

Hearing Identifier: Bellefonte_COL_Public_EX
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Subject: Courtesy email copy of TVA's Response to RAI Letter 16 Supplement 2 - Quality Assurance
Sent Date: 7/13/2009 1:04:14 PM
Received Date: 7/13/2009 1:05:10 PM
From: Spink, Thomas E

Created By: tespink@tva.gov

Recipients:
"Sterdis, Andrea Lynn" <alsterdis@tva.gov>
Tracking Status: None
"Eddie.Grant@excelservices.com" <Eddie.Grant@excelservices.com>
Tracking Status: None
"erg-xl@cox.net" <erg-xl@cox.net>
Tracking Status: None
"Ryan, William T III" <wtryan@tva.gov>
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"Comar, Manny" <Manny.Comar@nrc.gov>
Tracking Status: None
"Sebrosky, Joseph" <Joseph.Sebrosky@nrc.gov>
Tracking Status: None

Post Office: TVACOCXVS2.main.tva.gov

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MESSAGE	541	7/13/2009 1:05:10 PM
BLN RAI Response to RAI Letter 016 S2 final 20090713.pdf	312825	

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Recipients Received:

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

July 13, 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

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.

3) Letter from Andrea L. Sterdis (TVA) to Document Control Desk (NRC), Response to Request for Additional Information – Quality Assurance, dated October 16, 2008.

This letter provides the Tennessee Valley Authority (TVA) revised response to the Nuclear Regulatory Commission (NRC) request for additional information (RAI) items included in the Reference 1 letter.

A response to each 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 Tom 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 13th day of July, 2009.

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

Enclosure
cc: See Page 3

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 July 13, 2009
RAI Responses

Responses to NRC Request for Additional Information letter No. 016 dated May 12, 2008
(4 Pages, including this list)

Subject: Quality Assurance

RAI Number	Date of TVA Response
17.05-13	June 24, 2008
17.05-14	June 24, 2008
17.05-15	June 24, 2008; Revised by this letter – see following pages
17.05-16	June 24, 2008; October 16, 2008
17.05-17	June 24, 2008; Revised by this letter – see following pages
17.05-18	June 24, 2008

Attachments / Enclosures	Pages Included
None	

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-15

Part IV, Regulatory Commitments, of the Bellefonte QAPD, identifies the NRC Regulatory Guides and other quality assurance standards that have been selected to supplement and support the TVA QAPD. SRP 17.5, Section II.U.1.c, provides for a commitment to RG 1.37, Revision 1. However, RG 1.37 is not listed in the QAPD as an RG to which TVA commits. Revise the TVA QAPD Part IV to commit to RG 1.37, Revision 1, or justify its exclusion.

BLN RAI ID: 3521

BLN RESPONSE:

This section of the QAPD is standard text from NEI 06-14A. Consistent with the Regulatory Position of Regulatory Guide 1.37, Revision 1, NEI-06-14A, Revision 4, identifies a commitment to ASME NQA-1-1994 Part II, Subpart 2.1. This commitment is included in the QAPD in Part II, Section 13.2, but the QAPD does not address a commitment for Regulatory Guide 1.37, Revision 1.

NEI has revised the text in NEI 06-14A and resubmitted that document by letter dated May 7, 2008. This update includes a commitment to Regulatory Guide 1.37, Revision 1. In reviewing this Regulatory Guide, NEI also identified revisions addressing Regulatory Guides 1.26 and 1.29. The revised standard text is provided in the Application Revisions section below.

This response is expected to be STANDARD for the S-COLAs. While the QAPD is a PLANT-SPECIFIC document, the changes identified below are expected to be made for all S-COLAs since each was based on the NEI template.

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. COLA Part 2, FSAR, Chapter 1, Appendix 1AA, position for Regulatory Guide 1.37 was revised to address this issue in the January 2009 revision.

2. COLA Part 11, QAPD, Part II, Section 13.2, was revised to address this issue in the January 2009 revision.

3. COLA Part 11, QAPD, Part IV, was revised to address Regulatory Guides 1.26, 1.29, and 1.37 in the January 2009 revision.

ATTACHMENTS/ENCLOSURES:

None

NRC Letter Dated: May 12, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 17.05-17

For all RGs that describe quality assurance-related requirements, Appendix 1AA proposes to use the exception that quality assurance be in accordance with the QAPD. For the following RGs, explain how the QAPD provides an acceptable exception to the RGs. a. RG 1.28, Revision 3 b. RG 1.30, Revision 0 c. RG 1.33, Revision 2 d. RG 1.37, Revision 1 e. RG 1.38, Revision 2 f. RG 1.39, Revision 2 g. RG 1.94, Revision 1 h. RG 1.116, Revision 0 i. RG 1.139, Revision 0.

BLN RAI ID: 3522

BLN RESPONSE:

The QAPD provided in COLA Part 11 incorporates standard text from NEI 06-14A, Revision 4, which was approved by the NRC via SER dated April 25, 2007. This QAPD follows the SRP Section 17.5 and the NRC concluded in the SER that "On the basis of its review, the staff concludes that the QAPD template provides adequate guidance for establishing a quality assurance program that complies with Appendix B to 10 CFR Part 50 by using ASME NQA standard NQA-1-1994, as supplemented by additional regulatory guidance and industry guidance. Accordingly, the staff concludes that the QAPD template can be used by an applicant or holder for ESP, COL, construction, preoperation and/or operation activities, as applicable." SRP Section 17.5 and the SER (Accession Number ML070510300) issued for NEI 06-14A provide the basis for the following evaluations of the Regulatory Guides identified in this RAI.

a. Regulatory Guide 1.28, Revision 3 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI/ASME NQA-1-1983 and NQA-1a-1983 standards referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

b. Regulatory Guide 1.30, Revision 0 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI N45.2.4-1972 standard referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

c. Regulatory Guide 1.33, Revision 2 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI N18.7-1976 (ANS 3.2) standards referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

d. Regulatory Guide 1.37, Revision 1 – Conformance with this Regulatory Guide is addressed in response to question 17.05-15 above.

e. Regulatory Guide 1.38, Revision 2 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI N18.7-1976 (ANS 3.2) standards referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

f. Regulatory Guide 1.39, Revision 2 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is

written in accordance with ASME NQA-1-1994 rather than the ANSI N45.2.3-1974 standard referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

g. Regulatory Guide 1.94, Revision 1 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI N45.2.5-1974 standard referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

h. Regulatory Guide 1.116, Revision 0 – The FSAR Appendix 1AA exception states "Quality assurance is in accordance with the quality assurance program document (QAPD)." As indicated above, the QAPD is written in accordance with ASME NQA-1-1994 rather than the ANSI N45.2.8-1975 standard referenced by this Regulatory Guide. As indicated above, the use of ASME NQA-1-1994 has been approved as an acceptable alternative.

i. Regulatory Guide 1.139, Revision 0 – The FSAR Appendix 1AA exception for quality assurance is an error. The FSAR Appendix 1AA exception will be revised as shown below to address conformance with the operational aspects of this Regulatory Guide.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

COLA Part 2, FSAR Chapter 1, Appendix 1AA, was revised to address Regulatory Guide 1.139 conformance in the January 2009 revision.

ATTACHMENTS/ENCLOSURES:

None