



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

August 27, 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 – INSERVICE TESTING PROVISIONS

- References:
- 1) Letter from Ravindra G. Joshi (NRC) to Andrea L. Sterdis (TVA), Request for Additional Information Letter No. 007 Related to SRP Section 03.09.06 for the Bellefonte Units 3 and 4 Combined License Application, dated April 28, 2008.
 - 2) Letter from Andrea L. Sterdis (TVA) to NRC Document Control Desk, Bellefonte Combined License Application – Response to Request for Additional Information – Inservice Testing Provisions, dated June 12, 2008.
 - 3) Letter from Andrea L. Sterdis (TVA) to NRC Document Control Desk, Bellefonte Combined License Application – Response to Request for Additional Information – Inservice Testing Provisions, dated October 30, 2008.

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

A response to each NRC request in the subject letter is addressed in the enclosure(s) and 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 27th day of Aug, 2009.

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

D085
NR0

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Enclosure
cc: See Page 3

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cc: (w/Enclosure)

J. P. Berger, EDF
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M.W. Gettler, FP&L
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P. Hinnenkamp, Entergy
R. G. Joshi, NRC/HQ
M. C. Kray, NuStart
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M. C. Nolan, Duke Energy
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B. Hughes, NRC/HQ
R. H. Kitchen, PGN
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C. R. Pierce, SNC
R. Reister, DOE/PM
L. Reyes, NRC/RII
T. Simms, NRC/HQ
K. N. Slays, NuStart
J. M. Sebrosky, NRC/HQ

Enclosure
TVA letter dated August 27, 2009
RAI Responses

Responses to NRC Request for Additional Information letter No. 007 dated April 28, 2008
(4 pages)

Subject: Inservice testing program in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
03.09.06-02	June 12, 2008
03.09.06-03	June 12, 2008; Supplemented by this letter – see following pages
03.09.06-04	June 12, 2008
03.09.06-05	June 12, 2008; October 30, 2008
03.09.06-06	June 12, 2008; October 30, 2008
03.09.06-07	June 12, 2008
03.09.06-08	June 12, 2008
03.09.06-09	June 12, 2008
03.09.06-10	June 12, 2008
03.09.06-11	June 12, 2008
03.09.06-12	June 12, 2008; October 30, 2008
03.09.06-13	June 12, 2008
03.09.06-14	June 12, 2008
03.09.06-15	June 12, 2008
03.09.06-16	June 12, 2008; October 30, 2008

Associated Additional Attachments / Enclosures

None

Pages Included

Enclosure
TVA letter dated August 27, 2009
RAI Responses

NRC Letter Dated: April 28, 2008

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 03.09.06-03

The Bellefonte Final Safety Analysis Report (FSAR) incorporates by reference Subsection 3.9.3.4, "Component and Piping Supports," of the AP1000 DCD Tier 2, and adds new Subsection 3.9.3.4.4, "Inspection, Testing, Repair and/or Replacement of Snubbers." Bellefonte FSAR Subsection 3.9.3.4 does not provide a list of snubbers, but indicates that the list will be included as part of the testing program after the piping analysis is completed. The subsection describes the pre-service examination of snubbers, but not the inservice examination and testing program. Provide or reference the following information, or indicate the status of and schedule for its availability, on the inservice testing (IST) program for safety-related dynamic restraints: (a) identification of safety-related components that use snubbers in their support systems; (b) test frequency and duration and examination methods to be used in the IST program related to visual inspections and functional testing of dynamic restraints and basis for testing; and (c) specification of accessibility provisions for maintenance, IST and testing, and repair and replacement of snubbers.

BLN RAI ID:

BLN RESPONSE:

(a) Identification of safety-related components that use snubbers in their support systems is an activity conducted as a part of the completion of the piping stress analysis for the AP1000 safety-related piping systems, as indicated in DCD Subsection 3.9.3.4.3. FSAR Subsection 3.9.3.4.4.a. 1 states "A list of snubbers on systems which experience sufficient thermal movement to measure cold to hot position is included as part of the testing program after the piping analysis has been completed." FSAR Subsection 3.9.3.4.4.a.3 states that the safety-related components which utilize snubbers in their support systems are identified including the number of snubbers and snubber type used. This information, as shown in the Application Revisions section below, is now available and will be included in a future revision of the FSAR.

(b) No change from the June 12, 2008, response.

(c) No change from the June 12, 2008, response.

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

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. The COLA, Part 2, FSAR Chapter 3, Subsection 3.9.3.4.4 change identified in the June 12, 2008, response has been incorporated into the January 2009 COL application amendment.

2. COLA, Part 2, Revision 1, FSAR Chapter 3, Subsection 3.9.3.4.4, item a.1, will be revised from:

A list of snubbers on systems which experience sufficient thermal movement to measure cold to hot position is included as part of the testing program after the piping analysis has been completed.

To read:

A list of snubbers on systems which experience sufficient thermal movement to measure cold to hot position is included in Table 3.9-201.

3. COLA, Part 2, Revision 1, FSAR Chapter 3, Subsection 3.9.3.4.4, item a.3, will be revised from:

Safety-related components which utilize snubbers in their support systems will be identified in a future revision to the FSAR in table format that will include the following:

- identification of systems and components
- number of snubbers utilized in each system and on that component
- snubber type(s) – (hydraulic or mechanical) – and name of supplier
- constructed to ASME Code Section III, Subsection NF or other snubber use such as shock, vibration, or dual purpose
- snubber use such as shock, vibration, or dual purpose
- those snubbers identified as dual purpose or vibration arrestor type will include an indication if both snubber and component were evaluated

To read:

Safety-related snubbers are identified in Table 3.9-201, including the snubber identification and the associated system or component, e.g., line number. The snubbers on the list are hydraulic and constructed to ASME Section III, Subsection NF. The snubbers are used for shock loading only. None of the snubbers are dual purpose or vibration arrestor type snubbers.

4. COLA, Part 2, FSAR Chapter 3, Table 3.9-201 will be added to read:

TABLE 3.9-201
SAFETY RELATED SNUBBERS

System	Snubber (Hanger) No	Line #
CVS	APP-CVS-PH-11Y0164	L001
PXS	APP-PXS-PH-11Y0020	L021A
RCS	APP-RCS-PH-11Y0039	L215
RCS	APP-RCS-PH-11Y0067	L005B
RCS	APP-RCS-PH-11Y0080	L112
RCS	APP-RCS-PH-11Y0081	L215
RCS	APP-RCS-PH-11Y0082	L112
RCS	APP-RCS-PH-11Y0090	L118A
RCS	APP-RCS-PH-11Y0099	L022B
RCS	APP-RCS-PH-11Y0103	L003
RCS	APP-RCS-PH-11Y0105	L003
RCS	APP-RCS-PH-11Y0112	L032A
RCS	APP-RCS-PH-11Y0429	L225B
RCS	APP-RCS-PH-11Y0528	L005A
RCS	APP-RCS-PH-11Y0539	L225C
RCS	APP-RCS-PH-11Y0550	L011B
RCS	APP-RCS-PH-11Y0551	L011A
RCS	APP-RCS-PH-11Y0553	L153B
RCS	APP-RCS-PH-11Y0555	L153A
RCS	APP-RCS-PH-11Y2005	L022A
RCS	APP-RCS-PH-11Y2101	L032B
RCS	APP-RCS-PH-11Y2117	L225A

System	Snubber (Hanger) No	Line #
RNS	APP-RNS-PH-12Y2060	L006
SGS	APP-SGS-PH-11Y0001	L003B
SGS	APP-SGS-PH-11Y0002	L003B
SGS	APP-SGS-PH-11Y0004	L003B
SGS	APP-SGS-PH-11Y0057	L003A
SGS	APP-SGS-PH-11Y0058	L004B
SGS	APP-SGS-PH-11Y0063	L003A
SGS	APP-SGS-PH-11Y0065	005B
SGS	APP-SGS-PH-12Y0136	L015C
SGS	APP-SGS-PH-12Y0137	L015C
SGS	APP-SGS-PH-11Y0470	L006B
SGS	APP-SGS-PH-11Y2002	L006A
SGS	APP-SGS-PH-11Y2021	L006A
SGS	APP-SGS-PH-11Y3101	L006B
SGS	APP-SGS-PH-11Y3102	L006B
SGS	APP-SGS-PH-11Y3121	L006B
SGS	APP-SGS-PH-11Y0463	L006A
SGS	APP-SGS-PH-11Y0464	L006A
SGS	SG 1 Snubber A (1A)	(1)
SGS	SG 1 Snubber B (1B)	(1)
SGS	SG 2 Snubber A (2A)	(1)
SGS	SG 2 Snubber B (2B)	(1)

(1) These snubbers are on the upper lateral support assembly of the steam generators.

ATTACHMENTS/ENCLOSURES:

None