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

**BELL BEND NUCLEAR POWER PLANT
RESPONSE TO RAI No. 65
BNP-2009-396 Docket No. 52-039**

References: 1) M. Canova (NRC) to R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – Request for Information No. 66 (RAI No. 66) – CQVP-2817, e-mail dated December 3, 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 addressed the Initial Plant Test Program as discussed in Chapter 14 of the Final Safety Analysis Report (FSAR) and submitted in Part 2 of the Bell Bend Nuclear Power Plant (BBNPP) Combined License Application (COLA).

Enclosure 1 provides the responses to RAI Questions 14.02-26 and 14.02-27. There are no new regulatory commitments in this letter.

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 January 4, 2010

Respectfully,

Rocco R. Sgarro

RRS/kw

Enclosure: As stated

DD79
NRO

cc: (w/o Enclosures)

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Enclosure 1

Response to NRC Request for Additional Information No. 65
Bell Bend Nuclear Power Plant

Question 14.02-26:

Standard Review Plan (SRP, NUREG-0800) Section 14.2.II.3.G.i, concerning acceptance criteria for combined license (COL) and operating license applicants, "Utilization of Reactor Operating and Testing Experiences in the Development of the Test Program," states that "[t]he applicant should provide a summary of the principal conclusions or findings from the review of operating and testing experiences at other reactor facilities and their effect on the test program. This review should recognize categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program."

Section 14.2.8 of the applicant's FSAR incorporates, by reference, Section 14.2.8 of the U.S. EPR FSAR, which states that "[t]he design of the U.S. EPR is an evolutionary design. As such, the experience gained from previous successful startups is factored into the initial test program. This information reflects both AREVA NP operating and test experience and industry wide experience concerning pressurized water reactors. A summary will be developed to provide conclusions from this review and the effects on the test program."

The applicant's FSAR, however, does not state that the summary or review will contain recognized categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program. The NRC staff requests that the applicant supplement the discussion in section 14.2.8 of its FSAR to describe in detail testing experiences at other reactor facilities and categories of reportable, repeatedly experienced occurrences and other operating experiences that could potentially impact the performance of the test program.

Response:

The U.S. EPR FSAR, Revision 1, previously submitted to the U.S. NRC, included a revision to FSAR 14.2.8 that incorporated changes for the use of operating experience and reportable occurrences of repeated experienced safety concerns at the Design Certification Document level. Additionally, Revision 1 to the U.S. EPR FSAR also removed the COL Item included in U.S. EPR FSAR 14.2.8.1., which discussed First-of-a-Kind Testing. The BBNPP FSAR has been modified to remove discussion of these items in Section 14.2.8 and will continue to incorporate by reference the U.S. EPR FSAR 14.2.8 with no departures or supplements as shown below:

14.2.8 UTILIZATION OF REACTOR OPERATING AND TESTING EXPERIENCE IN DEVELOPMENT OF AN INITIAL TEST PROGRAM

No departures or supplements.

~~14.2.8.1 First-of-a-Kind Testing~~

~~The U.S. EPR FSAR includes the following COL Item in Section 14.2.8.1:~~

~~The first COL applicant that references the U.S. EPR certified design will commit to review results from European predecessors concerning the new,~~

~~unique, or novel EPR features such as those previously noted and propose supplemental testing if necessary.~~

~~This COL Item is addressed as follows:~~

~~{Calvert Cliffs Nuclear Power Plant Unit 3 was the first COL applicant that references the U.S. EPR certified design. This COL Item is not applicable to BBNPP}~~

COLA Impact:

The BBNPP FSAR will not be revised due to the response to this question.

Question 14.02-27:

Section 14.2.II.3.H.ii of the SRP states that the applicant should provide additional operator training and participation based on the performance and evaluation of the test results of certain initial tests. An acceptable program will satisfy the criteria described in Three Mile Island (TMI) Action Plan Item I.G.1 of NUREG-0660 and NUREG-0737. Furthermore, RG 1.206.C.I.14.2.9 states that the COL applicant should provide a schedule for development of plant procedures as well as a description of how, and to what extent, the plant operating, emergency, and surveillance procedures will be use-tested during the initial test program. In addition, the COL applicant should identify the specific operator training to be conducted as part of the use-testing during the special low-power testing program related to the resolution of TMI Action Plan Item I.G.1, described in NUREG-0660, NUREG-0694 and NUREG-0737. Furthermore, the COL Item identified in Section 14.2.9 of the U.S. EPR FSAR states that the COL applicant should identify the specific operator training to be conducted as part of the low-power testing program.

Section 14.2.9 of the applicant's COL identifies that to accomplish these goals; the emergency operating procedures will be performed on the plant simulator for procedure validation and operator training.

The NRC staff requests that the applicant revise Section 14.2.9 of its FSAR to include a provision that specific operator training and participation, based on the performance and evaluation of the test results of certain initial tests, will be conducted as part of the use-testing of the plant operating, surveillance, and emergency procedures during the initial test program, or to justify an alternative.

Response:

The U.S. EPR FSAR, Revision 1, previously submitted to the U.S. NRC, included a revision to FSAR 14.2.9 that incorporated changes related to trial use of operating and emergency procedures. These changes included a new COL Item for applicants to identify the specific operator training program as a part of the low-power testing program that addresses NUREG-0660, NUREG-0694 and NUREG-0737. Additionally, Revision 1 to the U.S. EPR FSAR 14.2.9 included the elements for a training program necessary to satisfy the referenced NUREGs in Phase I of the testing program. The BBNPP FSAR has been modified to include these changes and the changes are shown below:

14.2.9 TRIAL USE OF PLANT OPERATING AND EMERGENCY PROCEDURES

~~The emergency operating procedures will be performed on the plant simulator for procedure validation and operator training.~~

The U.S. EPR FSAR includes the following COL Item in Section 14.2.9:

A COL applicant that references the U.S. EPR design certification will identify the specific operator training to be conducted as part of the low-power testing program related to the resolution of TMI Action Plan Item I.G.1, as described in

(1) NUREG-0660 - NRC Action Plans Developed as a Result of the TMI-2 Accident, Revision 1, August 1980, (2) NUREG-0694 - TMI-Related Requirements for New Operating Licenses, June 1980, and (3) NUREG-0737 - Clarification of TMI Action Plan Requirements.

This COL Holder Item is addressed as follows:

Specific operator training and participation, as described in the U.S. EPR FSAR Section 14.2.9 will be conducted.

COLA Impact:

The BBNPP FSAR will not be revised due to the response to this question.