



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

January 5, 2010

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 – CONTROL ROOM HABITABILITY TRAINING**

Reference: Letter from Mr. Joseph M. Sebrosky (NRC) to Ms. Andrea L. Sterdis (TVA),
Request for Additional Information Letter No. 168 Related to SRP Section 06.04
for the Bellefonte Units 3 and 4 Combined License Application, dated
December 14, 2009

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

A response to the 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 5th day of Jan, 2010.

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

Enclosure
cc: See Page 2

D085
NR0

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cc: (w/ Enclosures)

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J. M. Sebrosky, NRC/HQ
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M. C. Kray, NuStart
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G. D. Miller, PG&N
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cc: (w/o Enclosure)

M. M. Comar, NRC/HQ
B. Hughes/NRC/HQ
R. H. Kitchen, PGN
A. M. Monroe, SCE&G
C. R. Pierce, SNC
R. Reister, DOE/PM
T. Simms, NRC/HQ

Enclosure
TVA letter dated January 5, 2010
RAI Responses

Responses to NRC Request for Additional Information letter No. 168 dated December 14, 2009
(3 pages, including this list)

Subject: Control Room Habitability Training in the Final Safety Analysis Report

<u>RAI Number</u>	<u>Date of TVA Response</u>
06.04-07	This letter – see following pages

<u>Associated Additional Attachments / Enclosures</u>	<u>Pages Included</u>
None	

Enclosure
TVA letter dated January 5, 2010
RAI Responses

NRC Letter Dated: December 14, 2009

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 06.04-07

AP1000 COL Information Items

- **STD COL 6.4-2: Control Room Habitability Training**

Included under Section 6.4.3 of the BLN COL FSAR, the applicant stated that procedures and training for control room habitability are written in accordance with Section 13.5 for control room operating procedures, and Section 13.2 for operator training. The procedures and training are verified to be consistent to the intent of Generic Issue 83. There are specific provisions in the site-specific portion of the FSAR.

However, the level of detail provided in standard portion of the FSAR Section 6.4.3 is not adequate to determine if the regulatory requirements are met. The applicable regulatory requirements are 10 CFR Part 50 Appendix A, GDC-19, "Control Room." The control room habitability training program must ensure that procedures and training are in place to meet the underlying assumptions made in the accident analysis associated with GDC-19. One acceptable approach to meeting GDC-19 is by complying with the applicable guidance for the control room habitability training program in RGs 1.78 and 1.196.

Open Item 6.4-1

Please provide in the FSAR the essential elements of the training and procedures necessary to demonstrate that the regulatory requirements are met. What will the operators be directed and trained to do to meet the recommendations in RG 1.196. Specifically, the staff requests information addressing the following:

- Regulatory Position C.5, "Emergency Planning" of Regulatory Guide 1.78
- Regulatory Position 2.5, "Hazardous Chemicals" of RG 1.196
- Regulatory Position 2.2.1, "Comparison of System Design, Configuration, and Operation with the Licensing Basis" of RG 1.196; and
- Regulatory Position 2.7.1 Periodic Evaluations and Maintenance of RG 1.196.

BLN RAI ID: 3995

BLN RESPONSE:

As documented in FSAR Appendix 1AA, the operational aspects of the identified guidance are met. Additional information will be provided to supplement the current FSAR Subsection 6.4.3 as shown in the Application Revisions section below. This additional information will be included in a future COLA submittal.

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

Enclosure
TVA letter dated January 5, 2010
RAI Responses

ASSOCIATED BLN COL APPLICATION REVISIONS:

1. Revise COLA Part 2, Chapter 1, Section 1.9, Table 1.9-201, to include the following additional cross-reference listing in the FSAR Chapter, Section, or Subsection column for Regulatory Guide 1.78:

6.4.3

2. Revise COLA Part 2, Chapter 1, Section 1.9, Table 1.9-201, for Regulatory Guide 1.196, from a listing in the FSAR Chapter, Section, or Subsection column of:

Not referenced; see Appendix 1AA

To read:

6.4.3

3. Revise COLA Part 2, Chapter 6, Subsection 6.4.3, to include the following new final paragraphs under the STD COL LMA for the existing paragraph:

The procedures and training address the toxic chemical events addressed in Sections 2.2 and 6.4 consistent with the guidance provided in regulatory position C.5 of Regulatory Guide 1.78, including arrangements with Federal, State, and local agencies or other cognizant organizations for the prompt notification of the nuclear power plant when accidents involving hazardous chemicals occur within five miles of the plant. The procedures include the conduct of periodic surveys of stationary and mobile sources of hazardous chemicals affecting the evaluations consistent with the guidance provided in regulatory position 2.5 of Regulatory Guide 1.196. The procedures include appropriate reviews of the configuration of the control room envelope and habitability systems consistent with the guidance provided in regulatory position 2.2.1 of Regulatory Guide 1.196. The procedures also include periodic assessments of the control room habitability systems' material condition, configuration controls, safety analyses, and operating and maintenance procedures consistent with the guidance provided in regulatory position 2.2.1 of Regulatory Guide 1.196.

Procedures for testing and maintenance are consistent with the design requirements of the DCD including the guidance provided in regulatory position 2.7.1 of Regulatory Guide 1.196.

ASSOCIATED ATTACHMENTS/ENCLOSURES:

None