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October 21, 2010

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

## BELL BEND NUCLEAR POWER PLANT PARTIAL RESPONSE AND REQUEST FOR EXTENSION FOR RAI No. 84 FOR FSAR CHAPTER 9 BNP-2010-261 Docket No. 52-039

## References: 1) M. Canova (NRC) to R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – Request for Information – Final Letter No. 84 (RAI No. 84) with Revision – SBPA - 3990, e-mail dated March 23, 2010

- R. R. Sgarro (PPL Bell Bend, LLC) to U.S. Nuclear Regulatory Commission, BNP-2010-096, "Partial Response for RAI 84 and Request for Extension", dated May 3, 2010 (ML101260116)
- 3) R. R. Sgarro (PPL Bell Bend, LLC) to U.S. Nuclear Regulatory Commission, BNP-2010-189, "Extension Request for Selected RAI No. 84 Questions", dated August 5, 2010 (ML102230150)

The purpose of this letter is to respond to the request for additional information (RAI) identified in the NRC correspondence to PPL Bell Bend, LLC (Reference 1). This RAI addresses the Ultimate Heat Sink, as discussed in Section 9.2.5 of the Final Safety Analysis Report (FSAR), and submitted in Part 2 of Bell Bend Nuclear Power Plant (BBNPP) Combined License Application (COLA).

References 2 and 3 provided updated schedule information for the RAI 84 response submittals. The response submittal target date of November 24, 2010 was established for the following Questions:

- 09.02.05-2 Bullet 4 (Partial response)
- 09.02.05-3
- 09.02.05-4 Bullet 7
- 09.02.05-4 Bullet 11
- 09.02.05-5 Bullet 2
- 09.02.05-14 Bullet 1

The enclosure provides the completion of our response to RAI No. 84, Question 09.02.05-2 Bullet 4. The responses to the other bulleted items identified in Question 09.02.05-2, as well as the classification designation of the Essential Service Water Emergency Makeup System strainer motors were submitted to the staff in Reference 2. The response provided in the enclosure includes revised COLA content, which will be included in the BBNPP COLA in a future revision.

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The remaining Questions; 09.02.05-3, 09.02.05-4 Bullet 7, 09.02.05-4 Bullet 11, 09.02.05-5 Bullet 2, and 09.02.05-14 Bullet 1, are dependent on RAI responses that are being addressed through the U.S. Evolutionary Power Reactor (U.S. EPR) FSAR. The work to address these questions is not complete at this time. PPL believes that the work to address these U.S. EPR FSAR RAIs will result in additional BBNPP Ultimate Heat Sink analyses, but the current scope and schedule for this additional work are not yet established. The target date for PPL to obtain the information from the U.S. EPR FSAR RAI responses is November 18, 2010. At that time, the additional scope and duration of any site-specific analyses will be assessed and the staff will be provided a schedule for the BBNPP RAI 84 responses by December 21, 2010.

The future revision of the COLA to include the response for Question 09.02.05-2 Bullet 4 (Partial) and the submittal of a schedule for the remaining RAI 84 question responses by December 21, 2010 are the only new regulatory commitments in this letter.

Should you have questions or need additional information, please contact the undersigned at 570.802.8102.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 21, 2010

Respectfully,

Rocco R. Sgarro

RRS/kw

Enclosure: As stated

cc: (w/o Enclosures)

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Mr. Michael Canova Project Manager U.S. Nuclear Regulatory Commission 11545 Rockville Pike, Mail Stop T6-E55M Rockville, MD 20852

## Enclosure

Response to NRC Request for Additional Information No. 84 Question 09.02.05-2 Bullet 4 (Partial) Bell Bend Nuclear Power Plant

Enclosure

### Question 09.02.05-2:

During its review of the information related to the site-specific UHS support systems in Bell Bend FSAR Table 3.2-1, "Classification Summary for Site-Specific SSCs," the staff found that additional information is needed and the Bell Bend FSAR needs to be revised accordingly to address the following items in accordance with GDC 1 requirements:

 While Bell Bend FSAR Table 3.2-1 indicates that non-safety-related piping is Seismic Category II, this designation is not clearly indicated on Bell Bend FSAR Figure 9.2-3. Also, the description in Bell Bend FSAR Section 9.2.5.3 indicates that some piping is used that does not satisfy American Society of Mechanical Engineering (ASME) specifications, but this information is not adequately described in Bell Bend FSAR Section 9.2.5, or indicated in Table 3.2-1 or on Figure 9.2-3.

Bell Bend FSAR Table 3.2-1 indicates that the intake screens are non-safety-related, Seismic Category II. However, the descriptive information in the Bell Bend FSAR is not sufficient to demonstrate that the screens are not needed to ensure that the ESWEMS will not be adversely impacted by large debris. If the screens must be relied upon in this manner, they should be designated as safety-related, Seismic Category I. Also, Bell Bend FSAR Section 9.2.5 identifies this item as "bar screens" and the descriptive information in Bell Bend FSAR Chapter 3 refers to this as "steel gratings." Consistent terminology should be used throughout the Bell Bend FSAR to avoid confusion.

Bell Bend FSAR Table 3.2-1 indicates that instrument and controls in the ESWEMS pumphouse are safety-related. This is not consistent with Figure 9.2-3 which indicates that the intake bay level and temperature instruments are non-safety-related. This inconsistency needs to be corrected. Also, in order to avoid confusion, all instruments for the site-specific UHS support systems should be identified on Table 3.2-1.

Bell Bend FSAR Table 3.2-1 is incomplete in that it does not provide classification designations for the site-specific parts of the blowdown and chemical treatment systems, and the classification designations for the ESWEMS strainer motors are also missing.

#### **Response:**

#### Bullet 1:

The response to this bullet was provided in PPL Letter BNP-2010-096, dated May 3, 2010 (ML101260116).

#### Bullet 2:

The response to this bullet was provided in PPL Letter BNP-2010-096, dated May 3, 2010 (ML101260116).

#### Bullet 3:

The response to this bullet was provided in PPL Letter BNP-2010-096, dated May 3, 2010 (ML101260116).

#### Bullet 4:

The classification designations for the site-specific parts of the blowdown and chemical treatment systems related to the Essential Service Water System (ESWS) will be added to FSAR Table 3.2-1.

The classifications designations for the ESWEMS strainer motors were provided in PPL Letter BNP-2010-096, dated May 3, 2010 (ML101260116).

Enclosure

## COLA Impact:

BBNPP FSAR Table 3.2-1 will be revised as follows:

KKS System or Component Code	System or Component Description	Safety Classification (Note 1)	Quality Group Classification	Seismic Category (Note 2)	10CFR50 Appendix B Program (Note 4)	Location (Note 3)	Comments/Commercial Code
PE Essential Service Water System					· · ·		
	<u>Site-specific</u> <u>ESWS</u> Blowdown	NS	<u> </u>	<u>NSC</u>	No	<u>UQB/UZT</u>	ASME B31.1
	Piping and Valves		-		•* •		
	<u>Site-specific</u> ESWS	<u>NS</u>	Ē	<u>NSC</u>	<u>No</u>	<u>UQB/UZT</u>	<u>ASME B31.1</u>
	<u>ESWS</u> <u>Chemical</u> <u>Treatment</u> <u>System</u>	· · ·				•	
• • •	Piping and Valves			· · ·		·	

# Table 3.2-1 - {Classification Summary for Site-Specific SSCs}