



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

December 22, 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 –REQUIRED UPDATES OF  
SAFETY ANALYSIS AND DEPARTURES REPORTS - Submittal No. 6**

References:

- 1) Letter from Ashok S. Bhatnagar (TVA) to R. William Borchardt (NRC), Application for Combined License for Bellefonte Units 3 and 4, dated October 30, 2007
- 2) Letter from David B. Matthews (NRC) to Ashok S. Bhatnagar (TVA), Application for Combined License for Bellefonte Units 3 and 4, dated January 18, 2008
- 3) Letter from Andrea L. Sterdis (TVA) to Document Control Desk (NRC), Bellefonte Combined License Application – Required Updates of Safety Analysis and Departures Reports, dated January 21, 2009
- 4) Letter from Andrea L. Sterdis (TVA) to Document Control Desk (NRC), Bellefonte Combined License Application – Required Updates of Safety Analysis and Departures Reports, dated December 15, 2009.
- 5) Letter from Ashok S. Bhatnagar (TVA) to Document Control Desk (NRC), Bellefonte Combined License Application – Submittal of Revision 1 to Part 3, Applicant's Environmental Report – Combined License Stage, And Part 9, Withheld Information, dated October 10, 2008

This letter provides the Tennessee Valley Authority's (TVA) updates to the Bellefonte Units 3 and 4 (BLN) Combined License (COL) application required by 10 CFR Part 52, Appendix D, subsection X.B. This update includes the annual update of the Final Safety Analysis Report (Part 2 of the BLN COL application), and the semi-annual update of the Departures Report (Part 7 of the BLN COL application). Additionally, Parts 9 and 10 of the COL application submitted by TVA in Reference 1, accepted by NRC in Reference 2, and updated by TVA in References 3 and 4 are updated. This update includes changes

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identified by previous correspondence, including responses to requests for additional information (RAI) and Safety Evaluation Report Open Items, from November 1, 2009 through October 30, 2010, as well as various other updates such as miscellaneous errata items.

Each revision to the COL application is identified by revision bars in the margin for text and tables and by the revision number for figures.

This application revision incorporates by reference Appendix D to 10 CFR Part 52 and the Westinghouse Electric Company's (Westinghouse's) application for amendment to portions of the AP1000 Design Control Document (DCD) Revision 17 (submitted September 22, 2008).

TVA requests that certain portions of this application revision be withheld from public disclosure. The justification for, and affidavit accompanying this request is included in Enclosure 1.

The BLN COL application is composed of several parts. Each of these is identified below, along with indication of any revision contained in this document update.

Part 1 - Administrative and Financial Information (Revision 1, not included).

Part 2 - Final Safety Analysis Report (FSAR) (Revision 3, included).

Part 3 - Environmental Report (Revision 1 submitted October 2008 (Reference 5, not included)).

Part 4 - Technical Specifications (Revision 2, not included).

Part 5 - Emergency Planning (Revision 2, not included).

Part 6 - [Not used. Reserved for applicants requesting Limited Work Authorization (LWA)].

Part 7 - Departures and Exemption Requests (Revision 3, included).

Part 8 - Safeguards/Security Plans (Revision 1, not included)

Part 9 - Withheld Information (Revision 4 included).

Part 10 - Proposed Combined License Conditions, (including inspections, tests, analyses, and acceptance criteria [ITAAC]) (Revision 3 included).

Part 11 - Enclosures (Revision 1, not included).

This application update contains no restricted data or national defense information requiring separation in accordance with 10 CFR §50.33.

Part 2 has been revised to reflect changes due to site-specific and standard RAI responses, Revision 17 of the DCD and miscellaneous errata.

Part 7 of this application revision contains requests for certain exemptions and departures from the referenced DCD.

Part 10 of this application revision includes a listing of ITAAC beyond those identified in Tier 1 of the AP1000 DCD, as well as proposed License Conditions. This part is updated primarily to reflect changes resulting from BLN's adoption of standard RAI responses.

Certain portions of the newly implemented 10 CFR Part 73, such as cyber security, and 10 CFR 52.80(d) are not reflected in this update due to ongoing interactions with the NRC concerning guidance and standard information being developed in coordination with NEI. An update is expected to be provided later to reflect these rule changes and the associated revisions to the corresponding NEI documents.

Consistent with common licensing practice and the original application, most of the updated application text is written in the present tense, active voice, including discussions of facilities and programs not yet built or implemented. Exceptions to this approach are the discussions of operating experience and completed studies and evaluations, which are written in the past tense. It should be understood, however, that statements regarding facilities (e.g., structures, systems and components) and pre-construction, pre-operational, and operational activities (e.g., procedures and programs) typically address activities that have not yet been performed and will not be performed until it is reasonable and appropriate to do so.

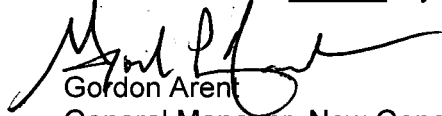
A complete set of the updated application documents (by Part as identified above) is provided in electronic file DVD format on the enclosed disk (Enclosure 2). Application documents (by Part) that are not updated are not included on the enclosed disk. Appropriate pre-submission checks have been successfully performed on the files to confirm compliance with the guidelines provided on the NRC web site, which have been found acceptable for electronic submittal. The disk includes a "packing slip" describing its contents, pursuant to NRC instructions for electronic filing.

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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](mailto:tespink@tva.gov).

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

Executed on this 22 day of Dec, 2010.



Gordon Arent  
General Manager, New Generation Licensing  
Nuclear Generation Development & Construction

Enclosure 1 - Affidavit  
Enclosure 2 - Bellefonte Units 3 and 4 COL Application Update (Submittal 6)

cc: See Page 5

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cc (w/o Enclosures):

Manny Comar, NRC/HQ  
S. P. Frantz, Morgan Lewis  
M. W. Gettler, FP&L  
R. C. Grumbir, NuStart  
P. S. Hastings, NuStart  
P. Hinnenkamp, Entergy  
Allen Fetter, NRC/HQ  
R. H. Kitchen, PGN  
M. C. Kray, NuStart  
A. M. Monroe, SCE&G  
C. R. Pierce, SNC  
L. Reyes, NRC/RII  
G. A. Zinke, NuStart

cc (w/o Enclosures):

G. P. Arent, EQB 1A-WBN  
J. A. Bailey, LP 5A-C  
A. L. Sterdis, LP 5A-C  
E. J. Vigluicci, WT 6A-K  
C. C. Chandler, WT 6A-K  
S. A. Vance, WT 6A-K  
EDMS, WT CA-K

Enclosure 1  
TVA letter dated December 22, 2010  
COL Application Update

In the Matter of )  
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 )  
Tennessee Valley Authority )  
Bellefonte Nuclear Plant, )  
Units 3 and 4 )  
Combined License Application )  
 )  
 )

AFFIDAVIT

STATE OF TENNESSEE )  
 )  
COUNTY OF HAMILTON )

Gordon Arent, after first being duly sworn, deposes and says:

1. I am employed as the General Manager, New Generation Licensing in Nuclear Generation Development and Construction at the Tennessee Valley Authority (TVA), an agency and instrumentality of the United States Government. I am familiar with the Combined License Application for TVA's Bellefonte Nuclear Plant, Units 3 and 4 ("Combined License Application") and have personal knowledge of the matters stated herein.

2. I am submitting this affidavit in accordance with 10 CFR § 2.390 and 10 CFR § 9.17, and because certain information contained in Enclosure 2 to this letter has been determined by TVA to be of the type customarily held in strict confidence by the agency and is protected from disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552(B), TVA's implementing FOIA regulations, 18 CFR § 1301, and the Trade Secrets Act, 18 U.S.C. § 1905.

3. The information which should not be released to the public has been collected and organized into Part 9 of Enclosure 2 to this letter.

4. The Combined License Application Part 1, Section 1.3, contains TVA's Financial Qualifications Information which is considered confidential and sensitive business information. Its disclosure would place TVA at a distinct disadvantage in conducting business as competitors could then seek to analyze the data to identify strengths and weaknesses and then seek to capitalize on those perceived strengths and weaknesses. As such, this information is protectable under 10 CFR § 2.390(a)(4) and (5), as well as Exemptions 4 and 5 of the FOIA and the Trade Secrets Act.

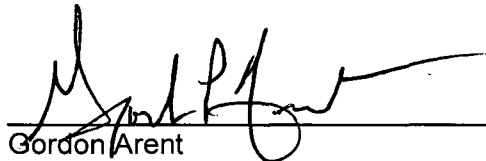
5. Figures 1.2-201, 9A-201, 12.3-201, 12.3-202, and 12.3-203 from the Combined License Application Part 2 contain security-sensitive information which should be withheld from the public pursuant to 10 CFR § 2.390(d), and 10 CFR § 9.17(a)(4).

6. Tables 2.2-203, 2.2-208, 2.2-215, 2.2-216, 2.2-217, 2.2-220, 2.2-221, 2.2-222, 2.2-223 and 2.4.1-206 from the Combined License Application Part 2 contain information related to critical infrastructure and key resources required to be protected from attack and is

Enclosure 1  
TVA letter dated December 22, 2010  
COL Application Update

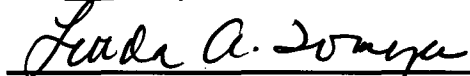
thus exempted from disclosure in accordance with 10 CFR § 2.390(a)(3), and Homeland Security Presidential Directive (HSPD-7) dated December 17, 2003.

7. The information sought to be withheld ("the information") is being submitted to the NRC in confidence.
8. The information is the sort of information regularly and customarily held in confidence by TVA and is, in fact, so held.
9. The information has consistently been held in confidence by TVA.
10. No public disclosures of the information have been made.
11. The information is not available in public sources.
12. Disclosures of the information to third parties, including any transmittals to the NRC, have been made pursuant to regulatory provisions or proprietary agreements which provide that the information is to be maintained in confidence.

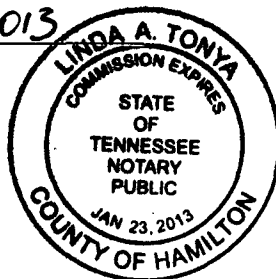
  
\_\_\_\_\_  
Gordon Arent  
General Manager, New Generation Licensing  
Nuclear Generation Development and Construction  
Tennessee Valley Authority  
423-751-2233

Sworn to and subscribed before me

this 22<sup>nd</sup> day of December 2010.

  
\_\_\_\_\_  
Linda A. Tonya

Notary Public  
My commission expires: 1-23-2013



Enclosure 2  
TVA letter dated December 22, 2010  
COL Application Update

Combined License (COL) Application Update

Bellefonte Units 3 and 4

DVD Format

One (1) DVD