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January 21, 2011

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

BELL BEND NUCLEAR POWER PLANT
RESPONSE TO RAI No. 99
BNP-2011-013 Docket No. 52-039

Reference: 1) M. Canova (NRC) to R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – FINAL Request for Information No. 99 (RAI No. 99) – RSAC 5096, 5097, e-mail dated November 17, 2010

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 Evaluation of Potential Accidents, as discussed in Section 2.2 of the Final Safety Analysis Report (FSAR), and submitted in Part 2 of Bell Bend Nuclear Power Plant (BBNPP) Combined License Application (COLA).

The enclosure provides our response to RAI No. 99, which includes revised COLA content. The revised COLA content will be included in a future revision of the BBNPP COLA. The future revision of the COLA is the only new regulatory commitment 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 January 21, 2011

Respectfully,

Rocco R. Sgarro

Rocco R. Sgarro

RRS/dw

Enclosure: As stated

D102
NRO

cc: (w/o Enclosure)

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Enclosure

Response to NRC Request for Additional Information No. 99
Bell Bend Nuclear Power Plant

Question 02.02.03-8:

RG 1.206 provides guidance regarding the information that is needed to ensure potential hazards in the site vicinity are identified and evaluated to meet the siting criteria in 10 CFR 100.20 and 10 CFR 100.21. The staff requests supplemental information following its review of the response to RAI No.2 Question 2.2.3-1 (dated June 25, 2009). The staff observes that the Material Safety Data Sheet (MSDS) for ammonium hydroxide (10-35% NH_3) states that the LEL is 16% and the UEL is 25%, with the potential for flammable vapors to accumulate in confined spaces. Therefore, the staff requests additional information regarding why ammonium hydroxide is not evaluated as an explosion hazard, even though it was evaluated in Rev. 0 of the COL FSAR, Section 2.2. Please revise the COL FSAR to include an evaluation of the explosion hazard posed by ammonium hydroxide or provide justification for screening it out.

Response:

Ammonium hydroxide explosion analyses have now been added to the on-site chemical hazards analysis and will be included in the BBNPP FSAR Section 2.2. The results show that the explosion analyses are bounded by the toxicity analysis for ammonium hydroxide. The safe standoff for a stationary explosion (using the methods presented in Regulatory Guide 1.91) is 184 feet. The safe distance for a delayed ignition explosion, following evaporation and dispersion, is 735 feet (calculated using ALOHA). In Section 2.2.3.1.3 of the COLA, where the toxicity analysis of ammonium hydroxide is discussed, it is stated that the ammonium hydroxide will be stored at least 4,500 feet from the control room. The BBNPP COLA will be revised as shown below.

COLA Impact:

The BBNPP FSAR will be revised as follows:

2.2.3.1.1 Explosions

Adjacent Site and Onsite Chemicals

The results using this methodology indicate that the minimum separation distances (i.e., safe distances) are less than the shortest distance from any safety-related BBNPP structure to the storage location of the identified chemicals. Therefore, an explosion of any of these chemicals would not adversely affect operation of BBNPP.

The hazardous materials stored on-site at BBNPP that were identified for further analysis with regard to explosive potential were <u>ammonium hydroxide,</u> diesel, dimethylamine, gasoline, hydrazine, hydrogen and argon-methane.

The safe distance for the <u>ammonium hydroxide (28% solution) is 184 ft (56 m); for the</u> diesel is 734 ft (224 m); for the dimethylamine (2% solution) is 290 ft (88 m); for the gasoline is 412 ft (126 m); for the hydrazine (35% solution) is 115 ft (35 m); for the hydrogen tank (48.05 pounds) is 271 ft (83 m); for the argon-methane mixture is 164 ft (50 m); and for hydrogen cylinder (1.45 pounds) is 78 ft (24 m). These chemicals will always be further than these standoff distances from the nearest BBNPP safety related building. These results are summarized in Table 2.2-10.

2.2.3.1.2 Flammable Vapor Clouds (Delayed Ignition)

Adjacent Site and Onsite Chemicals

Therefore, a flammable vapor cloud ignition or vapor cloud explosion involving the identified chemicals would not adversely affect the safe operation of BBNPP.

The hazardous materials stored onsite that were identified for further analysis with regard to the potential of delayed ignition and explosion of flammable vapor clouds were ammonium hydroxide, dimethylamine, gasoline, hydrogen and argon-methane.

The minimum separation distance for the ammonium hydroxide is 735 ft (224 m); for the dimethylamine is 291 ft (89 m); for the gasoline is 1,386 ft (422 m), for the hydrogen tank (48.05 pounds) is 990 ft (302 m); for the argon-methane mixture is 258 ft (79 m); and for the hydrogen cylinder (1.45 pounds) is 219 ft (67 m). The results of flammable vapor cloud ignition and explosion analyses are summarized in Table 2.2-12.

Table 2.2-2 - {SSES and BBNPP Chemical Storage}

Material	Toxicity Limit	Largest Container Amount	Location
Susquehanna Steam Electric Station (SSES) Units 1 and 2			
Alcohol, Isopropyl	2,000 ppm	676 lbs (307 kg)	Warehouse
Argon, Liquid	69,200 ppm	4,315 ft^3($122m^3$)	Cylinder Storage Area
Carbon Dioxide	40,000 ppm	25,000 lbs (11,340 kg)	Between Turbine Bldg and Circ Water Pumphouse
Diesel Fuel	Not toxic threat	1,940,072 lbs (880,002 kg)	Next to DG Buildings
Freon R-114	7,000 mg/m^3	24,343 lbs (11,042 kg)	Resin Bldg
Freon R-12	15,000 ppm	60,120 lbs (27,270 kg)	Resin Bldg
Gasoline, Benzene	500 ppm STEL 300 ppm TWA	61,642 lbs (27,960 kg)	Fuel Farm
Halon 1301	40,000 ppm	590 lbs (268 kg)	Security Control Center
Hydrogen, Liquid	4,000 ppm	10,017 lbs (4,544 kg)	Hydrogen-injection Tank Farm
Nitrogen, Liquid	69,200 ppm	10,318 lbs (4,680 kg)	N of S&A Bldg
Oxygen, Liquid	683,700 ppm	85,500 lbs (38,782 kg)	Hydrogen-injection Tank Farm
PCL-57 (1-hydroxyethlyidene-1,1-diphosphonic acid or HDEP)	500 mg/m^3	24,490 lbs (11,108 kg)	Circ Water Pumphouse
Sodium bisulfite solution	100 ppm	17,100 lbs (7,756 kg)	Shed behind Acid/Chlorine Bldg
Sodium Hypochlorite, 12% (CWPH)	10 ppm	72,571 lbs (32,918 kg)	Circ Water Pumphouse
Sulfur Hexafluoride, Compressed	1,000 ppm	115 lbs (52 kg)	Hydrogen Tank Farm
Bell Bend Nuclear Power Plant (BBNPP)			
Ammonium Hydroxide (28% solution)	300 ppm	8,500 gal (~~32,000~~ 32,176 l)	Potential Onsite Chemical at BBNPP
Diesel Fuel	Not toxic threat	125,000 gal (4.7E5 l)	Potential Onsite Chemical at BBNPP
Dimethylamine (2% solution)	500 ppm	350 gal (1,300 l)	Potential Onsite Chemical at BBNPP
Gasoline	500 ppm STEL 300 ppm TWA	4,000 gal (15,000 l)	Potential Onsite Chemical at BBNPP
Hydrazine (35% solution)	50 ppm	350 gal (1,300 l)	Potential Onsite Chemical at BBNPP
Hydrogen Tank	4,000 ppm	51.1 ft^3 (1.44 m^3) at 2,450 psig, -20°F to 200°F	Potential Onsite Chemical at BBNPP
Liquid Nitrogen	69,200 ppm	11,300 gal (42,800 l) sat liquid at -250°F	Potential Onsite Chemical at BBNPP
Sodium Hypochlorite	10 ppm	12,000 gal ~~(45.425 l)~~ (45,425 l)	Potential Onsite Chemical at BBNPP
Argon	69,200 ppm	270 scf (7.65 Nm^3) (1)	Potential Onsite Chemical at BBNPP
Argon-Methane (considered Methane)	5,000 ppm	282 scf (7.99 Nm^3) (1)	Potential Onsite Chemical at BBNPP
Hydrogen Cylinder	4,000 ppm	278 scf (7.87 Nm^3) (1)	Potential Onsite Chemical at BBNPP
Nitrogen Gas	69,200 ppm	235 scf (6.65 Nm^3) (1)	Potential Onsite Chemical at BBNPP
Oxygen	683,700 ppm	282 scf (7.99 Nm^3) (1)	Potential Onsite Chemical at BBNPP
Deposit Control Agent BL5323	-	1,000 gal (3,785 l)	Potential Onsite Chemical at BBNPP
Sodium Bisulfite 38%	100 as SO_2	500 gal (1,893 l))	Potential Onsite Chemical at BBNPP
Note: (1) Standard conditions are 68°F and 14.7 psia			

Table 2.2-5— {SSES Site and BBNPP Site Chemical Disposition}

Material	Toxicity Limit	Flammability	Explosion Hazard?	Disposition
SSES				
Alcohol, Isopropyl	2,000 ppm	2.0%-12.7%	Bounded	Meets RG 1.78 Limit
Argon, Liquid	69,200 ppm	Not Flammable	No	Meets RG 1.78 Limit
Carbon Dioxide	40,000 ppm	Not Flammable	No	Meets RG 1.78 Limit
Diesel Fuel	Not toxic threat	0.7%-6%	Confined	Explosion Analysis
Freon R-114	7,000 mg/m^3	Not Flammable	No	Meets RG 1.78 Limit
Freon R-12	15,000 ppm	Not Flammable	No	Meets RG 1.78 Limit
Gasoline, Benzene	500 ppm STEL 300 ppm TWA	1.4%-7.6%	Vapor/ confined	Explosion Analysis
Halon 1301	40,000 ppm	Not Flammable	No	Meets RG 1.78 Limit
Hydrogen, Liquid	4,000 ppm	4%-75%	Vapor/ confined	Explosion Analysis
Nitrogen, Liquid	69,200 ppm	Not Flammable	BLEVE Explosion	Meets RG 1.78 Limit, Explosion Analysis
Oxygen, Liquid	683,700 ppm	Not Flammable	BLEVE Explosion	Meets RG 1.78 Limit, Explosion Analysis
PCL-57 (1-hydroxyethlyidene-1, 1-diphosphonic acid or HDEP)	500 mg/m^3	Not Applicable	No	Meets RG 1.78 Limit
Sodium Bisulfite Solution	100 ppm	Not Applicable	No	Meets RG 1.78 Limit
Sodium Hypochlorite, 12% (CWPH)	10 ppm	Not Applicable	No	Limit Sodium Hypochlorite, 12% (CWPH) 10 ppm Not Applicable No
Sulfur Hexafluoride, Compressed	1,000 ppm	Not Flammable	No	Meets RG 1.78 Limit
BBNPP				
Ammonium Hydroxide (28% solution)	300 ppm	~~Not Flammable~~ 15%-28%	~~No~~ Vapor/Confined (2)	~~Toxicity Analysis~~ Flammability/Explosion/Toxicity Analysis
Diesel Fuel	Not Toxic (1)	0.7%-6%	Confined (2)	Explosion Analysis
Dimethylamine (2% solution)	500 ppm	2.8%-14.4%	Vapor/Confined (2)	Flammability/Explosion/Toxicity Analysis
Gasoline	500 ppm STEL 300 ppm TWA	1.4%-7.6%	Vapor/Confined (2)	Flammability/Explosion/Toxicity Analysis
Hydrazine (35% solution)	50 ppm	9.3%-83.4%	Confined (2)	Toxicity/Explosion Analysis
Hydrogen Tank	4,000 ppm	4%-75%	Vapor/Confined (2)	Flammability/Explosion/Toxicity Analysis
Liquid Nitrogen	69,200 ppm	Not Flammable	BLEVE Explosion	Toxicity/Explosion Analysis
Sodium Hypochlorite	10 ppm as Cl_2	Not Applicable	No	Low Vapor Pressure
Argon	69,200 ppm	Not Flammable	No	Toxicity Analysis
Argon-Methane (considered	5,000 ppm	4.4%-16.5%	Vapor/Confined (2)	Flammability/Explosion/Toxicity

Methane)				Analysis
Hydrogen Cylinder	4,000 ppm	4%-75%	Vapor/Confined [2]	Flammability/Explosion/Toxicity Analysis
Nitrogen Gas	69,200 ppm	Not Flammable	No	Toxicity Analysis
Oxygen	683,700 ppm	Not Flammable	No	Toxicity Analysis
Deposit Control Agent BL5323	-	Not Flammable	No	Toxicity Analysis
Sodium Bisulfite	100 ppm as SO_2	Not Flammable	No	Toxicity Analysis

Notes:
(1) Chemicals with vapor pressures less than 10 mmHg (0.0013 MPa) at 100°F (38°C) are not considered toxic or delayed vapor explosion hazards. The chemical will not enter the atmosphere fast enough to reach high enough concentrations to effect people or lead to delayed explosions.
(2) There are two types of explosion analyses: stationary confined explosions and delayed ignition vapor cloud explosions. The diesel and hydrazine is only analyzed for a stationary confined explosion, while ammonium hydroxide, hydrogen, dimethylamine, gasoline, and methane are analyzed for both types of explosions.

Table 2.2-10 - {Explosion Event Analysis}

Source Location	Pollutant Evaluated	Quantity	Distance to a BBNPP Safety Related Building	Distance to 1 psid peak overpressure
SSES	Hydrogen	10,017 lbs (4,544 kg)	0.70 mi (1.13 km)	0.34 mi (0.55km)
	Diesel	1,940,072 lbs (880,002 kg)	0.85 mi (1.37 km)	0.42 mi (0.68 km)
	Oxygen BLEVE	85.500 lbs (38,782 kg)	0.70 mi (1.13 km)	0.10 mi (0.16 km)
	Nitrogen BLEVE	10,318 lbs (4,680 kg)	0.70 mi (1.13 km)	0.05 mi (0.08 km)
U. S. Route 11	Gasoline	80,000 lbs (36,287 kg)	0.98 mi (1.58 km)	0.72 mi (1.16 km)
	Acetylene	16,000 lbs (7,257 kg)	0.98 mi (1.58 km)	0.41 mi (0.66 km)
	Propane	80,000 lbs (36,287 kg)	0.98 mi (1.58 km)	0.72 mi (1.16 km)
Canadian Pacific Railway	Ammonia	196,234 lbs (89,010 kg)	1.63 mi (2.62 km)	1.00 mi (1.61 km)
	Butane	173,643 lbs (78,763 kg)	1.63 mi (2.62 km)	Bounded by ammonia
Heller's Gas & Fireplaces	Propane	254,000 lbs (115,213 kg)	1.78 mi (2.68 km)	1.07 mi (1.72 km)
Deluxe Building Systems	Natural Gas/Methane	540,000 lbs (244,940 kg)	4.48 mi (7.21 km)	1.43 mi (2.30 km)
BBNPP	Ammonium Hydroxide (28% solution)	8,500 gal (32,176 l)	(3)	184 ft (56 m)$^{(1)}$
	Diesel Fuel	125,000 gal (473,177 l)	(3)	734 ft (224 m) $^{(1)}$
	Dimethylamine (2% solution)	58 lbs (26 kg)	(3)	290 ft (88 cm) $^{(4)}$
	Gasoline	4,000 gal (15,142 l)	(3)	412 ft (126 m) $^{(1)}$
	Hydrazine (35% solution)	350 gal (1,325 l)	(3)	115 ft (35 m) $^{(4)}$
	Hydrogen	48.05 lbs (21.8 kg)	(3)	271 ft (83 m) $^{(2)}$
	Argon-Methane (considered Methane)	11.8 lbs (5.4 kg)	(3)	164 ft (50 m) $^{(2)}$
	Hydrogen	1.45 lbs (0.7 kg)	(3)	78 ft (24 m) $^{(2)}$
	Liquid Nitrogen	11,300 gal (42,775 l)	(3)	360 ft (110 m) $^{(2)}$

Notes:

(1) For chemicals that are liquid under standard conditions, the storage vessel was assumed to contain 100% chemical vapor at atmospheric pressure.
(2) For compressed or liquefied gasses, the entire content of the storage vessel was conservatively assumed as the explosive mass.
(3) The storage distance for on-site chemicals will be selected such that each chemical is further from any safety related building that the standoff distance in this table.
(4) For some chemicals in an aqueous solution, the entire mass of the chemical in solution was used as the explosive mass.

Table 2.2-12 – (Flammable Vapor Cloud Events (Delayed Ignition Analysis)

Source Location	Pollutant Evaluated	Quantity	Distance to a BBNPP Safety Related Building	Distance to 1 psid Peak Overpressure	Maximum Explosive Concentration at BBNPP Buildings[(2)]
SSES	Hydrogen	10,017 lbs (4,544 kg)	0.70 mi (1.13 km)	(2)	1.49%
U.S. Route 11	Gasoline	80,000 lbs (36,287 kg)	0.98 mi (1.58 km)	0.40 mi (0.64 km)	-
	Acetylene	16,000 lbs (7,257 kg)	0.98 mi (1.58 km)	0.79 mi (1.27 km)	-
	Propane	80,000 lbs (36,287 kg)	0.98 mi (1.58 km)	0.75 mi (1.21 km)	-
Canadian Pacific Railway	Ammonia	196,234 lbs (89,010 kg)	1.63 mi (2.62 km)	1.2 mi (1.93 km)	-
	Butane	173,643 lbs (78,763 kg)	1.63 mi (2.62 km)	1.2 mi (1.93 km)	-
Heller's Gas & Fireplaces	Propane	254,000 lbs. (115,212 kg)	1.78 mi (2.86 km)	1.1 mi (1.77 km)	-
Deluxe Building Systems	Natural Gas/Methane	540,000 lbs (244,940 kg)	4.48 mi (7.21 km)	2.9 mi (4.67 km)	-
Transco Pipeline	Natural Gas/Methane	Pipeline/Proprietary	1.55 mi (2.49 km)	(2)	1.88%
UGI Pipeline	Natural Gas/Methane	Pipeline	0.17 mi (0.28 km)	(2)	3.37%
Sunoco Pipeline	Gasoline	Pipeline	1.72 mi (2.77 km)	379 yards (347 m)	-
BBNPP	Ammonium Hydroxide (28% solution)	8,500 gal (32,176 l)	(3)	735 ft (224 m)	-
	Dimethylamine (2% solution)	58 lbs (26 kg)	(3)	291 ft (89 m)	-
	Gasoline	18,647 lbs (8,458 kg)	(3)	1,386 ft (422 m)	-
	Hydrogen	48.05 lbs (21.8 kg)	(3)	990 ft (302 m)	-
	Argon-Methane (Considered Methane)	11.8 lbs (5.4 kg)	(3)	258 ft (79 m)	-
	Hydrogen	1.45 lbs (0.66 kg)	(3)	219 ft (67 m)	-

Notes:

(1) For compressed or liquefied gasses, the entire content of the storage vessel was conservatively assumed as the available explosive mass.
(2) The plume rises high enough such that the concentration of the chemical is below the LEL at all BBNPP structures. Therefore, the concentration will be too low for a confined vapor cloud explosion to occur, and an unconfined vapor cloud explosion will not occur because there will be no ignition sources above BBNPP structures.
(3) On-site chemicals will always be further from any safety related building than the 1 psid standoff distance in this table.

Question 02.02.03-9:

RG 1.206 provides guidance regarding the information that is needed to ensure potential hazards in the site vicinity are identified and evaluated to meet the siting criteria in 10 CFR 100.20 and 10 CFR 100.21. In order to complete a confirmatory analysis, the staff requests the input data and assumptions used to determine toxic chemical concentrations of ammonium hydroxide (28%) at the control room intake and in the control room due to a potential release from onsite storage at BBNPP.

Response:

There are two ammonium hydroxide toxicity models in the on-site hazards calculation. The first model determined that the standoff distance had to be greater than 1,700 feet for a tank without a berm around it. The second model used as input that the tank was located 4,500 feet away and has a 20 foot diameter berm around it. The inputs and assumptions to the model for the ammonium hydroxide toxicity analysis at a distance of 4,500 feet (the model reported in the COLA) are discussed below.

<u>Site Data (inputs):</u>
Air Exchange Rate: 0.3 /hr

<u>Conditions (assumptions):</u>
Date/Time: June 1, 2008, 1 AM (This date and time are used to allow ALOHA to select Stability Class F)
Relative Humidity: 50%
Ground Roughness: open country
Cloud Cover: 50%
Ground Type: Default soil
Ground Temperature: 25 °C (same as air temperature)

<u>Conditions (inputs):</u>
Temperature: 25 °C
Stability Class: F
Wind Speed: 1 m/s

<u>Chemical Data (inputs):</u>
Chemical: Ammonia Solution (28%)
Tank Volume: 8500 gallons
Puddle Diameter: 20 ft (berm)
Standoff Distance to Berm: 4,500 ft

No changes to the BBNPP COLA will be made as a result of this response.

COLA Impact:

The BBNPP COLA will not be revised as a result of this RAI question response.

Question 02.02.03-10:

RG 1.206 provides guidance regarding the information that is needed to ensure potential hazards in the site vicinity are identified and evaluated to meet the siting criteria in 10 CFR 100.20 and 10 CFR 100.21. The staff requests supplemental information following its review of the applicant's response to RAI No. 2 Question 2.2.3-6 (dated June 5, 2009). In its response to Question 2.2.3-6, the applicant stated that sodium hypochlorite stored onsite at BBNPP is screened out from evaluation due to low vapor pressure. However, the potential hazard posed by quantities of sodium hypochlorite stored at the nearby SSES was evaluated (COL FSAR Table 2.2-2). Please justify why the hazard posed by sodium hypochlorite stored at SSES is evaluated, but the hazard posed by sodium hypochlorite stored at BBNPP is screened out and not presented in COL FSAR Table 2.2-10.

Response:

In the off-site calculation, the tank of sodium hypochlorite at SSES is analyzed as if the entire mass of chlorine were released as a single puff. This analysis resulted in acceptable conditions in the control room. When the on-site tank of sodium hypochlorite was analyzed as if the entire mass of chlorine was released in a single puff, the concentration in the control room exceeded toxicity limits. However, it is unrealistically conservative to assume that the entire tank becomes chlorine gas. A more realistic approach is to determine the effective vapor pressure of chlorine over a spill of sodium hypochlorite, as evaluated below.

The vapor pressure of chlorine over a 15% solution of sodium hypochlorite is less than 10 mmHg at 100 °F. Sodium hypochlorite solutions are manufactured using excess sodium hydroxide to achieve a solution pH of approximately 12. This both retards solution decomposition and shifts sodium hypochlorite equilibria to the ionic form, which is not volatile. As a consequence, the vapor pressure of chlorine species over commercial sodium hypochlorite solutions is low.

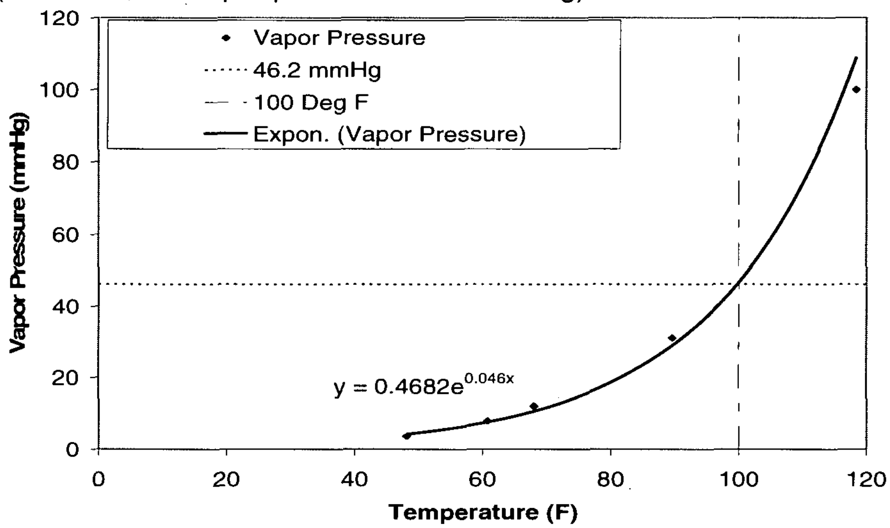
From the MSDS for 15% sodium hypochlorite, the vapor pressure as a function of temperature is given in the table below.

Vapor Pressure of Sodium Hypochlorite as a function of Temperature

Temperature (°F)	Vapor Pressure of the Solution (mmHg)
48.2	3.7
60.8	8.0
68.0	12.1
89.6	31.1
118.4	100.0

This data is curve fit to an exponential curve as shown in the figure below. Based on this curve fit the vapor pressure of the solution at 100°F is 46.2 mmHg.

Plot of vapor pressure of sodium hypochlorite solution
(At 100 °F, the vapor pressure is 46.2 mmHg)



The vapor pressure of pure water is 0.950 psi at 100° F (0.950 psi = 49.12 mmHg). Dissolved sodium hypochlorite makes up 15 volume percent of the solution, so the water vapor pressure over the solution is reduced proportional to solute mole fraction per Raoult's Law. Assuming an ideal solution, this would result in a partial pressure of 0.85 x 49.12 mmHg = 41.75 mmHg. The remaining vapor pressure is 4.4 mmHg (Vapor pressure = 46.2 – 41.75).

Consequently, the vapor pressures of chlorine compounds that are coming out of the solution are less than 10 mmHg. On-site sodium hypochlorite is therefore screened out based on the acceptance criteria from Regulatory Guide 1.78.

Chemicals that are screened out due to low vapor pressure (e.g. sodium hydroxide) are not included in Table 2.2-10; therefore, the on-site tank of sodium hypochlorite is not included in Table 2.2-10. The BBNPP COLA will not be revised as a result of the response to this RAI question.

COLA Impact:

The BBNPP COLA will not be revised as a result of the response to this question.