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MURLEY, T.E. Office of Nuclear Reactor Regulation, Director (Post 870411)

SUBJECT: Notifies NRC of plans to resume unrestricted completion activities at BLN 120 days from date of ltr.

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Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

Oliver D. Kingsley, Jr.
President, Generating Group

March 23, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Murley:

In the Matter of the Application of)
Tennessee Valley Authority)

Docket Nos. 50-438
50-439

**BELLEFONTE NUCLEAR PLANT (BLN) - RESUMPTION OF COMPLETION
ACTIVITIES**

The Tennessee Valley Authority (TVA) hereby notifies the NRC of its plans to complete BLN Units 1 and 2. This notification is being made pursuant to Section 6 of the Commission Policy Statement on Deferred Plants, 52 Federal Register 38,077 (October 14, 1987). TVA currently plans to resume unrestricted completion activities at BLN 120 days from the date of this letter. TVA's associated milestones are provided in Enclosure 1.

The NRC issued construction permits for BLN Units 1 and 2 on December 24, 1974. On February 1, 1978, TVA filed an application for operating licenses for BLN Units 1 and 2, including a Final Safety Analysis Report (FSAR), Operating License Stage Environmental Report (OLER), and antitrust information. The NRC docketed the operating license (OL) application on June 6, 1978. Since that time, a total of 30 amendments to the FSAR have been docketed.

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Dr. Thomas E. Murley
Page 2
March 23, 1993

By letter dated July 29, 1988, TVA notified the NRC that TVA had, on June 29, 1988, deferred the construction of BLN Units 1 and 2. At that time, TVA projected that construction would resume during fiscal year 1994 for BLN Unit 1 and during fiscal year 1996 for Unit 2. Included with TVA's deferral letter were three enclosures: Enclosure 1 contained a general discussion of TVA's planned activities during the deferral period, an outline of the status of the OL review, a listing of six major open technical issues, open inspection report responses, and a statement regarding outstanding commitments that TVA had made to the NRC that would be deferred pending reactivation; Enclosure 2 contained a general outline of the quality assurance program during the deferral period; and Enclosure 3 provided general information concerning the layup and maintenance program during deferral.

By letter dated October 31, 1988, the NRC responded to TVA's deferral letter. The Commission found TVA's approach to deferral acceptable, stating: "[t]he NRC review indicates that the construction deferral program addresses the requirements in the Commission Policy Statement and that TVA's program description and the commitments are acceptable."

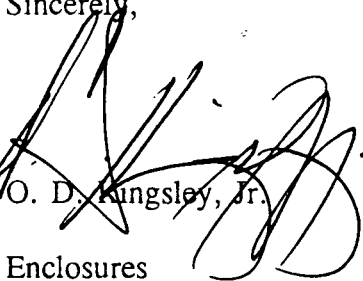
During BLN's deferral, the NRC has periodically examined TVA's implementation of the maintenance and layup program for the facility, including quality assurance, to determine compliance with commitments and overall program effectiveness. The staff has conducted 18 inspections of the BLN facility since its deferral, of which ten dealt with the Layup and Preservation program, and has issued a report on each inspection. As determined by these inspections, TVA has properly maintained and preserved equipment and materials and has retained records consistent with Policy Statement guidance. TVA quality assurance audits have also focused on activities associated with plant layup and preventative maintenance for a deferred plant. Any deficiencies identified during these audits have been processed in accordance with TVA's corrective action program.

While no NRC approval is required before completion activities resume for a deferred plant, the Policy Statement does request that the applicant's reactivation letter contain certain specific information. The information requested by the Policy Statement is set forth in Enclosures 1 through 9 to this letter. Enclosure 10 contains all commitments made by this letter.

Dr. Thomas E. Murley
Page 3
March 23, 1993

Should the staff have any questions or require further information, please telephone Bruce Schofield at (205) 574-8058.

Sincerely,



O. D. Kingsley, Jr.

Enclosures

cc (Enclosures):

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ENCLOSURE 1

Section 6.a. of the Policy Statement requests: "The proposed date for resuming construction, a schedule for completion of the construction, and a schedule for submittal of an operating license application, including a Final Safety Analysis Report (FSAR) if one has not already been submitted."

TVA Response:

TVA plans to resume completion engineering with some limited construction activities at BLN in 1993. The earliest planned dates for commercial operation are 1998-2000 for Unit 1 and 2002 for Unit 2.

The construction permits for BLN Units 1 and 2 will expire on July 1, 1994, and July 1, 1996, respectively. Applications for extensions to the existing construction permits for BLN Units 1 and 2 will be submitted in accordance with 10 CFR 2.109 and 10 CFR 50.55(b).

An OL application for BLN Units 1 and 2, together with the OL FSAR, the OLER, and OL antitrust information, was docketed on June 6, 1978.

A. GODY
(PMAS)

ENCLOSURE 2

Section 6.b. of the Policy Statement requests: "The current status of the plant site and equipment."

TVA Response:

During the deferral period, the plant site and equipment have been preserved and maintained in accordance with the program described in the deferral letter. The majority of Unit 1 and Common systems/equipment (e.g., Reactor Coolant System, Emergency Safety Features) are installed. Additionally, the major plant electrical distribution systems (e.g., 500 kV, 161 kV) are essentially complete. Table 1 is an estimated list of materials installed and remaining to be installed in the Unit 1 and Common areas. Table 2 is a similar listing for Unit 2 areas. The remaining quantities to be installed for Units 1 and 2 involve completion of work, rework, and modifications resulting from design review and closure of open items.

The remainder of civil components to be installed is related primarily to supportive structures such as hangers and stairwells. Other systems/components to be installed include:

- electrical cables, raceways, and terminations that require modifications/rework due to design reviews or changes in regulations
- protective coatings
- security systems, including the protected area and vital area boundaries
- penetration seals
- ASME hanger completion and modifications due to reanalyses

The fuel for BLN was shipped back to the manufacturer during 1992 for refabrication. There is no fuel on site. Delivery of the new fuel is anticipated to begin November 1997.

Degradation of equipment or components during the deferral period has not been observed such that equipment or component life would be significantly affected.

ENCLOSURE 2

TABLE 1

UNIT 1 AND COMMON CONSTRUCTION MATERIALS

COMMODITY	ESTIMATED QUANTITY INSTALLED	ESTIMATED QUANTITY REMAINING TO BE INSTALLED
<u>CIVIL</u>		
Concrete	320,000 cubic yards	3,000 cubic yards
Structural Steel Erection	13,000 tons	160 tons
Nuclear Grade Protective Coatings	575,000 square feet	510,000 square feet
Reinforcing Steel	20,000 tons	80 tons
<u>ELECTRICAL</u>		
Power and Control Conduit	840,000 linear feet	140,000 linear feet
Power and Control Cable	9,000,000 linear feet	2,300,000 linear feet
Electrical Cable Terminations	300,000	200,000
Cable Tray	200,000 linear feet	2,500 linear feet
<u>INSTRUMENTATION</u>		
Instruments	4,000	1,300
Instrument Tubing	300,000 linear feet	65,000 linear feet
<u>MECHANICAL</u>		
Ductwork	1,000,000 lbs	7,000 linear feet (≈ 189,000 lbs)
Duct Hangers	7,000	900
Large Bore Pipe	444,000 linear feet	13,000 linear feet
Large Bore Pipe Supports (nonseismic)	11,000	500
Large Bore Pipe Supports (seismic)	12,000	5,000
Small Bore Pipe	400,000 linear feet	15,000 linear feet
Small Bore Pipe Supports (nonseismic)	21,000	700
Small Bore Pipe Supports (seismic)	26,000	3,000
Valves (Large bore only)	5,000	425
Pipe Welding (Large Bore only)	300,000 diameter inches	4,500 diameter inches

ENCLOSURE 2

TABLE 2

UNIT 2 MATERIALS

COMMODITY	ESTIMATED QUANTITY INSTALLED	ESTIMATED QUANTITY REMAINING TO BE INSTALLED
<u>CIVIL</u>		
Concrete	80,000 cubic yards	2,000 cubic yards
Structural Steel Erection	700 tons	16 tons
Nuclear Grade Protective Coatings	80,000 square feet	91,000 square feet
Reinforcing Steel	8,000 tons	193 tons
<u>ELECTRICAL</u>		
Power and Control Conduit	220,000 linear feet	130,000 linear feet
Power and Control Cable	2,500,000 linear feet	2,500,000 linear feet
Electrical Cable Terminations	88,000	157,000
Cable Tray	33,000 linear feet	2,900 linear feet
<u>INSTRUMENTATION</u>		
Instruments	700	2,900
Instrument Tubing	22,000 linear feet	206,000 linear feet
<u>MECHANICAL</u>		
Ductwork	270,000 lbs	8,600 linear feet (≈ 232,000 lbs)
Duct Hangers	1,700	350
Large Bore Pipe	95,000 linear feet	22,000 linear feet
Large Bore Pipe Supports (seismic and nonseismic)	5,200	6,300
Small Bore Pipe	53,000 linear feet	45,000 linear feet
Small Bore Pipe Supports (seismic and nonseismic)	4,000	8,500
Valves (Large Bore only)	1,400	1,100
Pipe Welding (Large Bore only)	88,000 diameter inches	29,000 diameter inches

ENCLOSURE 3

Section 6.c. of the Policy Statement requests: "A description of how any conditions established by the NRC during the deferral have been fulfilled."

TVA Response:

The NRC did not establish any specific conditions for deferral. TVA defined the programs applicable during the deferral of BLN in its July 29, 1988 letter to the NRC, which provided a description of the construction deferral program and related commitments. The NRC found the program and commitments acceptable by letter dated October 31, 1988. NRC has conducted ten inspections of the Layup and Preservation Program implemented at BLN during deferral and documented its findings in Inspection Report Numbers 50-438/439-88-04, 88-06, 89-02, 89-03, 89-04, 89-05, 92-01, 92-02, 92-07, and 92-08. NRC has identified no programmatic weaknesses in the implementation of the Layup/Preservation Program. In addition, deficiencies identified during TVA quality assurance (QA) audits were processed in accordance with TVA's corrective action program.

The following is a summary of the Layup/Preservation and QA programs during deferral.

1. Layup/Preservation Program During Deferral

TVA's deferral of BLN initiated the formal transition from active construction to the preservation/maintenance mode of operation. Prior to this, the BLN facility, due to the slowdown in the construction schedule, had begun layup and preventative maintenance (PM) activities on selected systems. Plans and procedures relevant to these activities had been established and implemented. TVA also recognized the need to develop and conduct a program to assure the long-term layup and preservation of BLN Units 1 and 2.

The transitional phase of this program was conducted as outlined in TVA's document "Plan for Deferral of Bellefonte Nuclear Plant and Transition to a Maintenance Mode of Operation by October 1, 1988," Revision 1, dated September 1, 1988, which received review by the Staff and Revision 2, dated April 21, 1989.

During the transitional phase of this program, the following major activities were successfully implemented:

- Administrative controls, work controls, and technical procedures/instructions required for the transition, layup, preservation, and maintenance of the BLN facility were identified, developed (if required), and implemented.
- The Engineering Construction Modifications & Design Records Accountability Program was utilized as a tool to depict current plant status with regard to QA/non-QA records and system status.

- A revised site organization was put in place during the deferral period and staffed at the level required to support the planned activities during the transitional and long-term layup/maintenance phases.
- BLN-related records (both complete and incomplete) not already in an automated record retrieval system were delivered to BLN. These records consisted of quality-related and nonquality-related documents. The records were identified and their location tracked. The preservation and storage of these records have been, and continue to be, controlled under established procedures to protect the physical and access integrity of the record.

In order to facilitate the reactivation, efforts were begun to identify, evaluate, and status the individual records and ensure their entry into the appropriate retrieval system. This effort is currently ongoing.

- An evaluation was conducted of both permanent and temporary plant systems to identify those required to be operable during all phases of the layup and PM activities. Building environments and selected essential systems were monitored and maintained as needed to fulfill BLN's licensing and permit obligations and protect TVA's substantial investment in the facility.
- The material control program in effect prior to deferral was revised and modified, as necessary, to address the special requirements of the layup/PM activities planned for BLN. Corporate Engineering assumed responsibility for procurement of quality-related and ASME Code material required during the layup and PM process. PM of equipment and materials in storage has continued during the deferral period. Access control and conditions of warehouses/storage areas have been monitored. Any identified deficiencies in storage facilities are being resolved through the TVA Corrective Action Program.
- TVA continued to meet the conditions of its licenses for the storage of radioactive source, by-product, and special nuclear materials. Responsibility for portions of this activity were reassigned to other corporate groups to support the revised BLN organization in effect during the deferral mode.

Environmental conditions were maintained in accordance with applicable conditions and/or as specified in federal, state, or local requirements as they apply to BLN.

During the deferral period, those systems not required to remain operable were placed in layup for long-term PM. Systems needed for operation during deferral were maintained in accordance with current operating instructions and subjected to operational surveillance activities. Long-term layup activities included the following major efforts:

- Dryout and maintain stainless steel piping systems that are not in use.

Drain and maintain the dryout of the Component Cooling Water, Essential Raw Cooling Water, and Raw Cooling Water Systems as necessary.

Layup/preservation of designated systems was completed at BLN by May 1990 in accordance with the requirements of SDSP-BLE10, "Long-term Preservation and Maintenance of Plant Equipment."

A comprehensive relative-humidity monitoring program was developed and incorporated as part of the PM database. This verified that relative humidities would be maintained within the prescribed limits. Carbon steel and raw-water-wetted stainless steel systems are drained and maintained at less than 40 percent relative humidity. Other stainless steel systems are maintained free of standing water or condensate.

- Implement a test coupon program to monitor corrosion rates within selected systems and environmental conditions within selected building areas. The corrosion monitoring program was established to provide data for identification of corrosion problems in pipe wall materials in time to prevent serious damage or failure. Eighteen sets of coupons (two coupons per set) were installed in each of two representative piping systems: the Fire Protection System and the Condensate Storage System. These coupons, fabricated of materials to match the piping system material, are to be removed/examined at one, three, five, and seven years after initial installation, and the last coupon is to be removed at time of removal from layup status. The coupons are cleaned, weighed, and measured per standard test methods and then compared with their initial weight, measurements, etc. From this data, trending of progressive pipe corrosion, if any, can be established.

This program was initiated in April 1990. Since then three sets of coupons have been removed from each system (April/May 1991). From the data obtained from these initial coupons and data from the next set to be removed in April/May 1993, corrosion rates can be established and trending formalized.

- Provide HVAC for Control Room environmental control.
- Maintain the safety-related electronic systems, cooling fans, filters, and heaters energized as necessary.
- Keep the power distribution systems available for system use.

- Maintain the necessary portions of the fire protection and other selected systems, including plant security, in service.

As system layups were accomplished, surveillance requirements were incorporated into the PM database or other existing programs to ensure system layup integrity was maintained throughout the deferral period. This included semiannual walkdowns performed by the system engineers on each system in layup. Walkdowns covered electrical, mechanical, and instrumentation features in Units 1 and 2.

The PM program has been reviewed and upgraded during deferral. Major enhancements included:

- Determining attributes of inspection which could effectively be performed through other existing programs (e.g., housekeeping walkdowns, preservation program walkdowns, and operational surveillance activities).
- Identifying and implementing vendor requirements.
- Adopting INPO Good Practices.
- Developing user-friendly computer formats.
- Training system engineers to maintain PM trending data.

2. QA Program During Deferral

During the period of plant deferral, a QA program was implemented which monitored the layup and preservation activities being performed and ensured that the quality and licensability of the deferred plant were maintained.

The program which was implemented was based on the guidance provided in NRC Generic Letter 87-15, "Policy Statement on Deferred Plants," dated November 4, 1987. This program did not reduce 10 CFR 50, Appendix B requirements but focused efforts on equipment layup and the preservation program. A description of this program was provided to the NRC in TVA's deferral letter dated July 29, 1988, in Revision 0 to the Nuclear Quality Assurance Plan (NQAP) dated January 18, 1990, and amended by Revision 1, dated January 18, 1991.

During the period of plant deferral, implementation of the following QA programmatic elements was accomplished through approved procedures. These elements included:

- a. A description of the organizational structure for the plant showing functional relationships of personnel.

- b. An indoctrination and training program, which addressed the qualifications, responsibilities, and duties of personnel performing quality-related activities. The range of training was structured to that needed for ongoing activities during deferral.
- c. A description of construction status when work was suspended, including control of deviations from the established status which occur during the deferral period.
- d. The control of Measuring and Test Equipment (M&TE) used during deferral, including identification, calibration, and evaluation of out-of-calibration equipment.
- e. The control of work, including verification by the line organizations.
- f. A program for inspection by Quality Control/QA personnel using a graded approach.
- g. A program for operation of equipment and systems which continue in operation or must be operated periodically.
- h. A program for maintenance and layup of systems including:
 - (1) Establishment of acceptable conditions, periodic testing, and restoration of unacceptable conditions during layup.
 - (2) A listing identifying the location, storage level, and/or PM requirement for all permanent plant equipment and materials important to safety.
- i. The identification, reporting, and correction of adverse conditions, including 10 CFR 21 and 10 CFR 50.55(e) items.
- j. The collection, retention, and protection of records, including procedures, drawings, and controlled documents.
- k. The scheduling and performance of audits and monitoring, concentrating on activities being performed and programs in place.
- l. A program for plant security and access control.
- m. The identification of the program for deferral activities that are associated with reactivation.

Issued site procedures which were not being utilized during the period of deferral were placed in an inactive status. When an inactive procedure was found to be necessary during deferral, the applicable procedure was activated, reviewed, and reissued prior to the conduct of the activity.

During the deferral period, three NRC inspections included a review of the QA Program (50-438/439-88-06, 89-05, and 92-02.) Two additional inspections reviewed QA audit results. No violations or open items resulted from these inspections.

Upon the reactivation, BLN will comply with the requirements of the NQAP as applicable site programs are implemented.

ENCLOSURE 4

Section 6.d. of the Policy Statement requests: "A listing of licensing issues that were outstanding at the time of deferral and a description of the resolution or proposed resolution of these issues."

TVA Response:

Based upon TVA's July 29, 1988 deferral letter to the NRC, the following BLN-specific licensing issues were open at the time of deferral:

A. Status of FSAR and OLER Questions

In December 1978, the NRC issued a series of questions to TVA concerning the FSAR and the OLER (first-round questions). TVA had responded to the majority of the FSAR questions by January 5, 1979 (FSAR Amendment 18), and to all the OLER questions by September 5, 1982.

TVA currently owes responses to ten Round One FSAR questions. TVA plans to submit responses to these outstanding FSAR questions by January 1996.

Question 281.2	Question 440.13
Question 410.9	Question 471.10 (III.D.3.3)
Question 430.105(c)	Question 471.11
Question 430.106(b)	Question 480.43 (position 6)
Question 430.106(c)	Question 640.36

TVA has responded to all 57 OLER Round One questions. TVA has not received a response on the FSAR question responses already submitted nor to the OLER question responses.

To date TVA is not aware of changes to the plant which would require the OLER to be updated. If significant changes are identified or do occur, the OLER will be revised accordingly.

B. Status of Open Major Technical Issues with NRC Staff

1. In-Service Inspection (ISI) Exemption for Piping Enclosed by Guard Pipes

TVA has not received a final NRC response to TVA's November 15, 1976 request for an exemption from ISI requirements for inaccessible high-energy piping welds. Additional information was transmitted to the NRC on November 21, 1978; September 9, 1980; and July 22, 1983, to support review of this exemption.

TVA continues to request a Staff response to this exemption request. We have reviewed the documentation submitted to date and do not believe any additional information is required for the NRC's review of this issue.

2. Pipe Break Exclusion for Piping Inside the Main Steam Valve Room

TVA has not received an NRC response to its July 21, 1976 request for an exclusion from use of postulated pipe breaks in the main steam and feedwater piping. Additional information was submitted on July 22, 1983, to support NRC's review.

TVA continues to seek a Staff response to this request. This issue is an integral part of the ISI exemption request discussed in Item 1 and, as such, should be considered concurrently with the ISI request.

3. NUREG 0737 - Power Operated Relief Valve (PORV) Reliability Study

TVA has not received an NRC response to its position that the automatic isolation system will not be a major contributor to the probability of a small break loss of coolant accident (LOCA). This position was set forth in a December 13, 1984 submittal to the NRC on the NUREG-0737 PORV Reliability Study conducted by B&W Owners Group. An automatic PORV isolation system was installed in Unit 1 and is included in the design for Unit 2.

TVA continues to request a staff response to this issue. NRC's review and response are needed to allow us to determine if any future action is required by TVA to bring this issue to resolution.

4. Purge Paper Particle Size

TVA has not received an NRC response to its April 18, 1983 exemption request from its commitments to ANSI N45.2.1-1973 requirements dealing with purge paper particle size. Additional information was submitted on December 22, 1987, to support review of this exemption.

TVA believes that this exemption request is warranted and continues to request a Staff response.

5. Main Steam Line Break

TVA has not received an NRC response to its March 25, 1985, proposed improved method for calculating the peak containment temperature resulting from a main steam line break. Additional information was submitted on May 28, 1986, to support NRC's review.

This issue was addressed in connection with the BLN position paper on Environmental Qualification of Electrical Equipment that was submitted for NRC's

position paper that because the proposed methodology is new, with generic implications, the staff would be unable to evaluate the proposed methodology at that time and would expect the review to require substantial time and effort.

A meeting was held between TVA and NRC on August 25, 1992, to discuss the status of this issue. The NRC is currently evaluating TVA's proposal. TVA is continuing to pursue resolution of this issue with NRC.

6. B&W Plant Sensitivity to Feedwater Changes/Plant Dynamic Response Analysis (PDRA)

In a letter dated October 25, 1979, the NRC requested that TVA provide information regarding the design adequacy of B&W nuclear steam supply systems utilizing once-through steam generators. The NRC indicated that this information would be used to determine whether it was necessary to halt all or portions of the construction of the plant. BLN responded to the request in a letter dated December 3, 1979. In a letter dated March 25, 1980, the NRC requested further information on the material provided by TVA. TVA provided the additional information in letters dated May 30, 1980, and September 4, 1980. In a letter dated April 25, 1980 (before TVA provided the requested additional information), the NRC notified BLN that, based on the review of information that had been provided by BLN, the NRC and the Advisory Committee on Reactor Safeguards had concluded that it was not necessary to halt the construction of the plant. Contrary to the statement in the deferral letter, the current BLN review of the correspondence for this issue has determined that no further NRC action is required on this issue.

7. Open Inspection Report Responses

TVA has not submitted responses to NRC Inspection Reports 50-438/439-88-01 and 50-438/439-87-07.

TVA has reviewed these two inspection reports and identified four items that require a formal response. TVA plans to submit responses to these items as follows:

DEV 88-01-03	December 1, 1993
VIO 88-01-04	December 1, 1993
VIO 88-01-05	December 1, 1993
URI 87-07-02	December 10, 1993

In addition, TVA has compared its list of NRC open items (e.g., inspection report items, Construction Deficiency Reports, commitments) with that maintained by NRC Region II, and an effort has been made to reconcile any differences (Ref. Inspection Report 50-438/439 92-02). TVA is preparing a project plan for resolution of each of these items and will continue to keep the NRC informed of our schedule.

During deferral, TVA submitted a series of position papers on selected topics. The purpose of these position papers was to establish TVA's position on how it intends to meet criteria for completion and licensing of BLN. A total of 14 position papers were submitted for NRC review, and agreement was reached on each.

A review of these position papers identified that no substantive site or design changes resulted from this effort.

ENCLOSURE 5

Section 6.e. of the Policy Statement requests: "A listing of any new regulatory requirements applicable to the plant that have become effective since plant construction was deferred, together with a description of the licensee's proposed plans for compliance with these requirements or a commitment to submit such plans by a specified date."

TVA Response:

Those NRC regulatory requirements from Title 10 of the Code of Federal Regulations applicable to BLN that have become effective since June 29, 1988, and TVA's plan for compliance with the applicable requirements are listed in Table 1.

Additionally, though not specifically requested by the Policy Statement, Tables 2 and 3 list those Generic Letters and Bulletins that a BLN response has been requested but not yet submitted with the projected date for submittal of these responses. These tables also include those Generic Letters and Bulletins that have been issued since BLN's deferral and do not request a response or are not applicable to BLN. Generic Letters and Bulletins issued prior to deferral that requested a response have been responded to, with the exception of Generic Letter 81-10 (as noted in Table 3).

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 20, "Standards for Protection Against Radiation and Extension of Implementation Date"	05/21/91 (56 FR 23360) and 08/26/92 (57 FR 38588)	Revised its standards for protection against ionizing radiation. This revision conforms the regulation to the Presidential Radiation Protection Guidance and Federal Agencies for Occupational Exposure. This revision also recommends national and international radiation protection organizations. The implementation date for this revised rule was extended from January 1, 1993 to January 1, 1994.	TVA will comply with this rule.
10 CFR 26, "Fitness for Duty Programs"	07/07/89 (54 FR 24468)	Promulgated to require licensees authorized to construct or operate nuclear power reactors to implement a fitness-for-duty program. The general objective of this program is to provide reasonable assurance that nuclear power plant personnel are reliable, trustworthy, and not under the influence of any substance, legal or illegal, or mentally or physically impaired from any cause, which in any way adversely affects their ability to safely and competently perform their duties.	TVA currently complies with this rule through the implementation of its corporate Fitness for Duty program.
10 CFR 34, "Radiography and Radiation Safety Requirements for Radiographic Operations"	01/10/91 (53 FR 19247)	Revised the safety requirements for industrial radiographic equipment to require licensees to use only those radiographic exposure devices and associated equipment that provide certain safety features. In addition, the changes require radiographers to wear alarm ratemeters.	TVA intends to comply with these requirements as appropriate.

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 50, Appendix E, Section VI "Emergency Response Data System"	09/12/91 (56 FR 40185)	Revised to require licensees of all operating nuclear power facilities, except Big Rock Point, to participate in the Emergency Response Data System (ERDS) program. This action requires licensees to submit to the NRC timely and accurate data on a limited set of parameters whose values indicate the condition of the plant during a declaration of an alert or higher emergency classification.	TVA will comply with this rule at the time of licensing.
10 CFR 50, Appendix J, "Primary Containment Leak Rate Testing"	11/15/88 (53 FR 45890)	Revised leakage rate testing requirements for the primary containment to permit the use of a new statistical data analysis technique, (a "Mass Point" method) as described in ANSI/ANS-56.8-1987.	No specific response is required and no additional requirements are being imposed.
10 CFR 50.46 and 50, Appendix K, "Emergency Core Cooling System (ECCS) Acceptance Criteria"	10/17/88 (53 FR 35996)	Revised to allow the use of alternate methods to demonstrate ECCS performance during a loss of coolant accident (LOCA) and relaxes certain requirements for reporting and reanalysis.	TVA's method of compliance with this rule change will be described in the LOCA analysis to be submitted by October 1994.
10 CFR 50.47(d), "Emergency Planning Requirements for Fuel Loading and Low Power Testing"	10/24/88 (53 FR 36955)	Revised to more clearly establish what emergency planning and preparedness requirements are needed for fuel loading and low power testing of nuclear power plants.	TVA will comply with this rule as part of the development of the Emergency Plan for BLN.

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 50.54(w), "Stabilization and Decontamination Priority and Trusteeship Provisions"	04/02/90 (55 FR 12163)	Revised to (1) clarify the scope and timing of the stabilization and decontamination processes after an accident, (2) specify that insurance is required to provide for cleanup and decontamination efforts after an accident, and (3) eliminate the requirement that insurance proceeds after an accident are to be paid to an independent trustee.	TVA currently complies with this rule at all of its nuclear power plants.
10 CFR 50.54(x), "Conditions of Licenses"	03/20/89 (54 FR 7178)	Revised to allow a licensee to take action that departs from approved technical specifications in a national security emergency. The amendment specifies the regulations that for a national security emergency a licensee is permitted to take a needed action that may deviate from technical specifications.	No specific response is required and no additional requirements are being imposed.
10 CFR 50.55(e), "Criteria and Procedures for the Reporting of Defects and Conditions of Construction Permits"	10/29/91 (56 FR 36081)	Revised to reduce duplicate reporting of defects, clarify the criteria for reporting defects, and establish uniform time periods for reporting and uniform requirements for the content of safety defect reports.	TVA currently complies with this rule.

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 50.61, "Fracture Toughness Requirements for Protection Against Pressurized Thermal Shock Events"	06/14/91 (56 FR 22300)	Revised to change the procedure for calculating the amount of radiation embrittlement that a reactor vessel receives. The pressurized thermal shock (PTS) rule establishes a screening criterion. This criterion limits the amount of embrittlement of a reactor vessel beltline material beyond which the plant cannot continue to operate without justification based on a plant-specific analysis. The final amendment does not change the screening criterion. The PTS rule also prescribes the procedure that must be used for calculating the amount of embrittlement for comparison with the screening criterion. The final amendment updates the procedure and makes it consistent with the one given in Regulatory Guide 1.99, Revision 2, published in May 1988. The effective date of this final rule is June 14, 1991.	Not applicable to BLN since the rule change applies only to those licensees for which an OL has been issued.
10 CFR 50.63, "Station Blackout"	07/21/88 (53 FR 23203)	Revised to require the ability to cope with an accident involving a total loss of alternating current electric power (i.e., Station Blackout) for a specified duration.	TVA will submit information to the NRC by July 30, 1994 regarding how BLN plans to comply with this requirement.

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 50.65, "Monitoring the Effectiveness and Maintenance of Nuclear Power Plants"	07/10/96 (56 FR 31324)	Revised to require commercial nuclear power plant licensees to monitor the effectiveness of maintenance activities for safety-significant plant equipment in order to minimize the likelihood of failures and events caused by the lack of effective maintenance. The final rule requires that licensees monitor the performance or condition of certain structures, systems, and components (SSCs) against licensee-established goals in a manner sufficient to provide reasonable assurance that those SSCs will be capable of performing their intended functions. Licensees will be required to evaluate the overall effectiveness of their maintenance programs on at least an annual basis.	TVA will comply with this rule.
10 CFR 73.21, "Requirements for the Protection of Safeguards Information"	05/25/89 (54 FR 17703)	Revised to be consistent with the Omnibus Diplomatic Security and Anti-Terrorism Act of 1986. This act requires nuclear power reactor applicants and licensees to conduct Federal Bureau of Investigation criminal history checks of certain individuals with access to information protected as Safeguards Information.	TVA will comply with this rule through the development of the Physical Security Plan for BLN.

ENCLOSURE 5 TABLE 1
REGULATORY REQUIREMENTS ISSUED DURING THE DEFERRAL PERIOD

TITLE	EFFECTIVE DATE	DESCRIPTION	BLN STATUS
10 CFR 73.56, "Personnel Access authorization requirements for nuclear power plants," and 10 CFR 73.57, "Requirements for Criminal History Checks of Individuals Granted Unescorted Access to a Nuclear Power Facility or Access to Safeguards Information by Power Reactor Licensees"	05/28/91 (56 FR 18997)	Revised to require an access authorization program for individuals requiring unescorted access to protected and vital areas at nuclear power plants. These amendments require an access authorization program that consists of three elements: background investigation, psychological assessment, and behavioral observation.	TVA will comply with this rule through the development of the Physical Security Plan for BLN.

ENCLOSURE 5 TABLE 2
NRC BULLETIN EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Bulletin 88-04 - Potential Safety-Related Pump Loss	10/01/95
Bulletin 88-05 - Nonconforming Material Supplied by Piping Supplies, Inc., at Folsum, New Jersey, and West Jersey Manufacturing Company at Williamston, New Jersey	04/11/94
Bulletin 88-06 - Actions to be taken for the transportation of Model No. Spec 2-T Radiographic Exposure Device	1
Bulletin 88-07 - Power Oscillations in Boiling Water Reactors (BWR)	2
Bulletin 88-08 - Thermal Stresses in Piping Connected to Reactor Coolant Systems	09/10/96
Bulletin 88-09 - Thimble Tube Thinning in Westinghouse Reactors	3
Bulletin 88-10 and Supplement 1 - Nonconforming Molded-Case Circuit Breakers	09/10/94
Bulletin 88-11 - Pressurizer Line Stratification	10/10/96
Bulletin 89-01 - Failure of Westinghouse Steam Generator Tube Mechanical Plugs, Original, Supplement 1 and Supplement 2	05/08/93
Bulletin 89-02 - Stress Corrosion Cracking of High-Hardness Type 410 Stainless Steel Internal Preloaded Bolting in Anchor Darling Model S350W Swing Check Valves and Valves of Similar Design	02/10/94
Bulletin 89-03 - Potential Loss of Required Shutdown Margin During Refueling Operations	07/10/97
Bulletin 90-01 Supplement 1 - Loss of Fill-Oil in Transmitter Manufactured by Rosemount	01/10/96
Bulletin 90-02 - Loss of Thermal Margin Caused by Channel Box Bow	2
Bulletin 91-01 - Reporting Loss of Criticality Safety Controls	5
Bulletin 92-01 - Failure of Thermo-Lag 330 Fire Barrier System to Maintain Cabling in Wide Cable Trays and Conduits Free from Fire Damage	4

- ¹ Not Applicable (Operating Licensees only)
- ² Not Applicable (BWRs only)
- ³ Not Applicable (Westinghouse reactors only)
- ⁴ For Information Only to Construction Permit Holders
- ⁵ Not Applicable (Fuel Cycle and Uranium Fuel Research and Development Licensees Only)

ENCLOSURE 5 TABLE 3
 GENERIC LETTER EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Generic Letter 81-10 - Post-TMI Requirements for the Emergency Operations Facility	07/01/96
Generic Letter 88-10 - Purchase of GSA Approved Security Containers	1
Generic Letter 88-11 - NRC Position on Embrittlement of Reactor Vessel Materials and its Impact on Plant Operations	04/12/94
Generic Letter 88-12 - Removal of Fire Protection Requirements from Technical Specifications	2
Generic Letter 88-13 - Operator Licensing Examinations	4
Generic Letter 88-14 - Instrument Air Supply System Problems Affecting Safety-Related Equipment	10/11/93
Generic Letter 88-15 - Electric Power Systems - Inadequate Control over Design Processes	2
Generic Letter 88-16 - Removal of Cycle Specific Parameter Limits from Technical Specifications	2
Generic Letter 88-17 - Loss of Decay Heat Removal - 10 CFR 50.54(f)	04/30/95
Generic Letter 88-18 - Plant Record Storage on Optical Disk	2
Generic Letter 88-19 - Use of Deadly Force by Licensee Guards to Prevent Theft of Special Nuclear Material	2
Generic Letter 88-20 - Individual Plant Examination for Severe Accident Vulnerabilities - 10 CFR 50.54(f)	10/10/96
Generic Letter 88-20 - Supplement 4 - Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities - 10 CFR 50.54(f)	10/10/96
Generic Letter 89-01 - Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Tech Specs and Relocation of Procedural Details of RETs to the ODCM or PCP	2
Generic Letter 89-02 - Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products	2
Generic Letter 89-03 - Operator Licensing National Examination Schedule	2
Generic Letter 89-04 - Guidance on Developing Acceptable Inservice Testing Programs	2

- ¹ Not Applicable (Operating Licensees only)
- ² Information Only, No response requested
- ³ Not Applicable (BWRs only)
- ⁴ Not Applicable based on OL schedule
- ⁵ Not Applicable (Strategic SNM Facilities only)
- ⁶ Not Applicable (Westinghouse reactors only)

ENCLOSURE 5 TABLE 3
 GENERIC LETTER EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Generic Letter 89-05 - Pilot Testing of the Fundamentals Examination	4
Generic Letter 89-06 - Task Action Plan I.D.2 - Safety Parameter Display System - 10 CFR 50.54(f)	01/10/96
Generic Letter 89-07 - Power Reactor Safeguards Contingency Planning for Surface Vehicle Bombs	04/01/96
Generic Letter 89-08 - Erosion/Corrosion Induced Pipe Wall Thinning	09/09/94
Generic Letter 89-09 - ASME Section III Component Replacements	1
Generic Letter 89-10 - Safety-Related Motor-Operated Valve Testing and Surveillance	12/15/93
Generic Letter 89-11 - Resolution of Generic Issue 101 "Boiling Water Reactor Water Level Redundancy"	3
Generic Letter 89-12 - Operator Licensing Examinations	4
Generic Letter 89-13 - Service Water System Problems Affecting Safety-Related Equipment	09/10/94
Generic Letter 89-14 - Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals	2
Generic Letter 89-15 - Emergency Response Data System	2
Generic Letter 89-16 - Installation of a Hardened Wetwell Vent	3
Generic Letter 89-17 - Planned Administrative Changes to the NRC Operator Licensing Written Examination Process	4
Generic Letter 89-18 - Resolution of Unresolved Safety Issue A-17, "Systems Interactions in Nuclear Power Plants"	2
Generic Letter 89-19 - Request for Action Related to Resolution of Unresolved Safety Issue A-47, "Safety Implication of Control Systems in LWR Nuclear Power Plants"	01/01/96
Generic Letter 89-20 - Protected Area Long-Term Housekeeping	5
Generic Letter 89-21 - Request for Information Concerning Status of Implementation of Unresolved Safety Issue (USI) Requirements	04/15/94

- ¹ Not Applicable (Operating Licensees only)
- ² Information Only, No response requested
- ³ Not Applicable (BWRs only)
- ⁴ Not Applicable based on OL schedule
- ⁵ Not Applicable (Strategic SNM Facilities only)
- ⁶ Not Applicable (Westinghouse reactors only)

ENCLOSURE 5 TABLE 3
 GENERIC LETTER EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Generic Letter 89-22 - Potential for Increased Roof Loads and Plant Area Flood Run-off Depth at Licensed Nuclear Power Plants due to Recent Change in Probable Maximum Precipitation Criteria Developed by the National Weather Service	2
Generic Letter 89-23 - NRC Staff Responses to Questions Pertaining to Implementation of 10 CFR 26	2
Generic Letter 90-01 - Request for Voluntary Participation in NRC Regulatory Impact Survey	2
Generic Letter 90-02 - Alternative Requirements for Fuel Assemblies in the Design Features Section of the Technical Specifications	2
Generic Letter 90-03 - Relaxation of Staff Position in GL 83-28, Item 2.2, Part 2, "Vendor Interface for Safety-Related Components"	12/01/93
Generic Letter 90-04 - Request for Information on the Status of Licensee Implementation of GSIs Resolved with Imposition of Requirements or Corrective Actions	04/15/94
Generic Letter 90-05 - Guidances for Performing Temporary Non-Code Repair of ASME Code Classes 1, 2, and 3 Piping	2
Generic Letter 90-06 - Resolution of GI 70, "Power-Operated Relief Valve and Block Valve Reliability," and GI 94, "Additional Low-Temperature Pressure Protection for LWRs"	04/30/97
Generic Letter 90-07 - Operator Licensing National Examination Schedule	4
Generic Letter 90-08 - Simulation Facility Exemptions	2
Generic Letter 90-09 - Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions	2
Generic Letter 91-01 - Removal of the Schedule for Withdrawal of Reactor Vessel Material Specimens from Technical Specifications	2
Generic Letter 91-02 - Reporting Mishaps Involving LLW Forms Prepared for Disposal	1
Generic Letter 91-03 - Reporting of Safeguard Events	2
Generic Letter 91-04 - Changes in Technical Specifications to Accommodate 24-month Fuel Cycle	2

- 1 Not Applicable (Operating Licensees only)
- 2 Information Only, No response requested
- 3 Not Applicable (BWRs only)
- 4 Not Applicable based on OL schedule
- 5 Not Applicable (Strategic SNM Facilities only)
- 6 Not Applicable (Westinghouse reactors only)

ENCLOSURE 5 TABLE 3
 GENERIC LETTER EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Generic Letter 91-05 - Licensee Commercial Grade Procurement and Dedication Programs	2
Generic Letter 91-06 - Resolution of Generic Issue A-30, "Adequacy of Safety-Related DC Power Supplies," Pursuant to 10 CFR 50.54(f)	1
Generic Letter 91-07 - GI-23, "Reactor Coolant Pump Seal Failures" and their Possible Effect on Station Blackout	2
Generic Letter 91-08 - Removal of Components Lists from Technical Specifications	2
Generic Letter 91-09 - Modification of Surveillance Interval for the Electrical Protection Assemblies in Power Supplies for the Reactor Protection System	3
Generic Letter 91-10 - Explosive Searches at Protected Area Portals	5
Generic Letter 91-11 - Resolution of Generic Issues 48, "LCOs for Class 1E Vital Instrument Buses," and 49, "Interlocks and LCOs for Class 1E Tie Breakers" Pursuant to 10 CFR 50.54(f)	1
Generic Letter 91-12 - Operator Licensing National Examination Schedule	4
Generic Letter 91-13 - Request for Information Related to the Resolution of Generic Issue 130, "Essential Service Water System Failures at Multi-Unit Sites," Pursuant to 10 CFR 50.54(f)	6
Generic Letter 91-14 - Emergency Communications	4
Generic Letter 91-15 - Operating Experience Feedback, Solenoid-Operated Valve Problems at US Reactors	2
Generic Letter 91-16 - Licensed Operators' and Other Nuclear Facility Personnel Fitness for Duty	2
Generic Letter 91-17 - Generic Safety Issue 29, "Bolting Degradation or Failure in Nuclear Power Plants"	2
Generic Letter 91-18 - Information to Licensees Regarding two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability	2
Generic Letter 91-19 - Information to Addressees Regarding new Telephone Numbers for NRC Offices Located in One White Flint, North	2

- ¹ Not Applicable (Operating Licensees only)
- ² Information Only, No response requested
- ³ Not Applicable (BWRs only)
- ⁴ Not Applicable based on OL schedule
- ⁵ Not Applicable (Strategic SNM Facilities only)
- ⁶ Not Applicable (Westinghouse reactors only)

ENCLOSURE 5 TABLE 3
 GENERIC LETTER EXPECTED RESPONSE SUBMITTAL STATUS

SUBJECT	EXPECTED SUBMITTAL DATE
Generic Letter 92-01, Revision 1 - Reactor Vessel Structural Integrity - 10 CFR 50.54(f)	04/15/94
Generic Letter 92-02 - Resolution of Generic Issue 79, "Unanalyzed Reactor Vessel (PWR) Thermal Stress during Natural Convection"	2
Generic Letter 92-03 - Compilation of Current Licensing Basis; Request for Voluntary Participation in Pilot Program	2
Generic Letter 92-04 - Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation on BWRs Pursuant to 10 CFR 50.54(f)	3
Generic Letter 92-05 - NRC Workshop on the Systematic Assessment of Licensee Performance (SALP) Program	2
Generic Letter 92-06 - Operator Licensing National Examination Schedule	4
Generic Letter 92-07 - Office of Nuclear Reactor Regulation Reorganization	2
Generic Letter 92-08 - Thermo-Lag 330-1 Fire Barriers	09/01/93
Generic Letter 92-09 - Limited Participation by NRC in the IAEA International Nuclear Event Scale	2

- ¹ Not Applicable (Operating Licensees only)
- ² Information Only, No response requested
- ³ Not Applicable (BWRs only)
- ⁴ Not Applicable based on OL schedule
- ⁵ Not Applicable (Strategic SNM Facilities only)
- ⁶ Not Applicable (Westinghouse reactors only)

ENCLOSURE 6

Section 6.f. of the Policy Statement requests: "A description of the management and organization responsible for construction of the plant."

TVA response:

Site Organization

Attachment 1 to this Enclosure contains a current organizational chart of BLN management. TVA Nuclear Power Organization Description (TVA-NPOD89-A) contains a more detailed description of the BLN management organization.

Construction Organization

Following its selection of a contractor to complete the construction of BLN, TVA will submit a description of that contractor's management organization responsible for construction of the plant.

General Philosophy

As the owner and the NRC licensee for BLN, TVA is responsible for ensuring that the construction of BLN is completed, and that the plant will be operated and maintained in a manner that protects public health and safety and complies with applicable regulatory requirements.

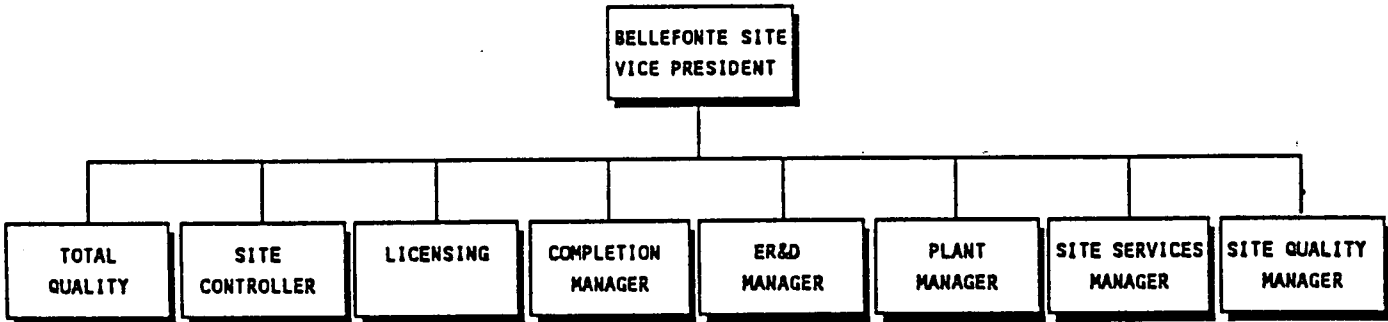
TVA's BLN Site Vice President has the overall responsibility for the completion of plant design and construction, plant startup, plant operation, site management, and the quality of the plant. The BLN Site Vice President is assisted in this area by the BLN site management team as shown in Attachment 1 to this enclosure. The site management team supervises and manages all activities on the site so as to achieve the established goals of completing and operating BLN, implementing site policies and procedures effectively, and ensuring the safety of the plant, plant personnel, and the public. This team will function throughout the engineering, construction, and testing phase.

A Completion Department, consisting primarily of contractors from the architect engineer and constructor organizations, will be responsible for completing the remaining work on the plant. The Completion Department is headed by a TVA manager and contains TVA personnel from various areas to assist in the completion of BLN. Completion of existing structures, systems, and components will be the immediate responsibility of the Completion Department. Upon the successful completion of construction and testing activities, the plant will then be turned over to the Operations Department under the Plant Manager.

ATTACHMENT 1

BELLEFONTE NUCLEAR PLANT
ORGANIZATION CHART

BELLEFONTE NUCLEAR PLANT
BELLEFONTE ORGANIZATION
01/20/93



ENCLOSURE 7

Section 6.g. of the Policy Statement requests: "A description of all substantive changes made to the plant design or site since the Construction Permit was issued (for those plants for which an OL application has not been submitted)."

TVA Response:

This item does not apply to BLN, since an OL application for BLN Units 1 and 2 was submitted to the NRC in 1978.

ENCLOSURE 8

Section 6.h. of the Policy Statement requests: "Identification of any additional required information that is not available at the time of reactivation and a commitment to submit this information at a specific later date."

TVA Response:

TVA believes that it has provided all information requested in the Policy Statement.

ENCLOSURE 9

Section 6.i. of the Policy Statement requests: "As necessary, an amendment to the OL application (revised FSAR) and a discussion of the bases for all substantive site and design changes that have been made since the last FSAR revision was submitted (for those plants which were already under OL review at the time of deferral)."

TVA Response:

Amendment 29 to the BLN FSAR was submitted on November 17, 1988. TVA submitted Amendment 30 to the BLN FSAR during the deferral period to incorporate agreements reached with NRC on selected technical issues. These agreements were in the form of NRC reviews of and responses to position papers submitted by TVA. During deferral, no substantive site or design changes were made which would make an amendment to the FSAR necessary at this time.

ENCLOSURE 10

Commitments generated by this submittal:

- TVA's method of compliance with 10 CFR 50.46 and Appendix K will be described in the LOCA analysis submittal.
- TVA will submit information to the NRC regarding how BLN plans to comply with 10 CFR 50.63, Station Blackout.
- Following selection of a contractor to complete the construction of BLN, TVA will submit a description of that contractor's management organization responsible for construction of the plant.