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AUTH. NAME AUTHOR AFFILIATION
 WALLACE, E.G. Tennessee Valley Authority
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Lists licensing activities required to complete & license plant for 1991 & 1992. Util will submit SRP/design comparison to review & validate FSAR during last quarter 1991.

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

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Gentlemen:

In the Matter of the Application of) Docket No. 50-438
Tennessee Valley Authority) 50-439

BELLEFONTE NUCLEAR PLANT (BLN) - LICENSING ACTIVITIES FOR 1991 AND 1992

TVA will continue its assessment of the work required to complete and license BLN. In support of this effort, certain licensing activities will be conducted which will require NRC support. A brief discussion of these is provided below.

1. TVA is currently conducting a review of the BLN design to the guidance contained in NUREG 0800, "Standard Review Plan for Review of Safety Analysis Reports for Nuclear Power Reactors" (SRP). This effort will provide a comparison of the BLN design with each section of the SRP and a statement as to how BLN plans to apply the guidance provided. When completed, TVA will use this comparison to review and validate the Final Safety Analysis Report (FSAR) (i.e., ensure that the description/discussion provided in the FSAR matches design). TVA intends to submit this SRP/design comparison to the NRC for review and comment the last quarter of 1991.

2. FSAR Amendment(s)

During the last quarter of 1991, TVA plans to prepare and submit an amendment to the BLN FSAR to incorporate, as appropriate, the agreements reached with NRC on the position papers. This amendment will be prepared and submitted in parallel with the SRP comparison discussed above.

A second FSAR amendment is planned for June 1992, which will provide the results of an FSAR validation (i.e., FSAR matches design) program to be conducted during the October 1991 through April 1992 timeframe. The results of this validation effort are intended to provide both TVA and NRC with a baseline for the work remaining to complete BLN and a schedule that will allow for resource allocation for plant completion.

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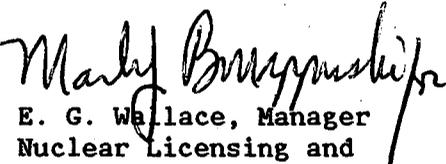
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3. TVA will continue to perform the engineering required to determine the scope of work needed to complete BLN. To ensure an accurate determination, the engineering effort will include a review of regulatory issues (e.g., Generic Letters, Bulletins, new regulations, etc.). For those issues that require a response to NRC, TVA will prepare and submit the planned resolution for staff review and concurrence. The magnitude of this effort is not known at this time, based on the amount of engineering work completed to date, although it is not expected to require extensive NRC resources.
4. TVA expects that instances will arise during the engineering process which will deal with regulatory applicability and/or acceptable alternatives to meeting certain requirements. TVA will seek NRC guidance on these issues on a case-by-case basis.

If you have any questions please contact Mr. Bruce Schofield at (205) 574-8058.

Very truly yours,

TENNESSEE VALLEY AUTHORITY


E. G. Wallace, Manager
Nuclear Licensing and
Regulatory Affairs

cc: Ms. S. C. Black, Deputy Director
Project Directorate II-4
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

NRC Resident Inspector
Bellefonte Nuclear Plant
P.O. Box 2000
Hollywood, Alabama 35752

Mr. M. C. Thadani, Project Manager
U.S. Nuclear Regulatory Commission
One White Flint, North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. B. A. Wilson, Chief, Project Chief
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323