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March 30, 2012

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

ATTN: Michael R. Johnson
Office of New Reactors

**BELL BEND NUCLEAR POWER PLANT
SUBMITTAL OF BELL BEND COLA,
REVISION 3
BNP-2012-089 Docket No. 52-039**

- References: 1) BNP-2010-040, Rocco R. Sgarro (PPL Bell Bend, LLC) to U.S. Nuclear Regulatory Commission, "Submittal of Bell Bend COLA, Revision 2", dated February 12, 2010.
- 2) Sandra Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of Revision 2 of the U.S. EPR Final Safety Analysis Report for Design Certification, NRC:10:081," dated August 31, 2010.
- 3) Sandra Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Submittal of Revision 3 of the U.S. EPR Final Safety Analysis Report for Design Certification, NRC:11:085," dated August 10, 2011.
- 4) BNP-2011-187, Rocco R. Sgarro (PPL Bell Bend, LLC) to Document Control Desk (NRC), "Request for Exemption from 10 CFR § 50.71 (e)(3)(iii)," dated October 26, 2011.
- 5) BNP-2011-230, Rocco R. Sgarro (PPL Bell Bend, LLC) to Document Control Desk (NRC), "COLA Part 3 (Environmental Report) Update to Reflect Site Footprint Relocation," dated December 19, 2011.
- 6) BNP-2012-072, Rocco R. Sgarro (PPL Bell Bend, LLC) to Document Control Desk (NRC), "Schedule Information for Responses to Requests for Additional Information for the Bell Bend FSAR," dated March 14, 2012.

In Reference 1, PPL Bell Bend, LLC (PPL) submitted to the U.S. Nuclear Regulatory Commission (NRC) Revision 2 to the Combined License Application (COLA) for the Bell Bend Nuclear Power Plant (BBNPP). This revised application was for an AREVA NP U.S. Evolutionary Power Reactor (U.S. EPR) to be located in Luzerne County, Pennsylvania.

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Provided herein is Revision 3 to the BBNPP COLA. This COLA revision incorporates changes resulting from Revisions 2 and 3 of the U.S. EPR FSAR (References 2 and 3), COLA changes resulting from relocation of the plant footprint within the existing project boundary, PPL responses to Requests for Additional Information (RAIs) submitted to the NRC through March 5, 2012, and Part 3 Environmental Report changes previously submitted on December 19, 2011 (Reference 5). A summary of these changes is provided in Enclosure 1.

In Reference 4, PPL requested an exemption from the 10 CFR 50.71(e)(3)(iii) requirement to submit a 2011 update to the BBNPP COLA, and committed to the submittal of BBNPP COLA Revision 3 by March 30, 2012. The updated information provided in COLA Revision 3 includes changes from 2011 and 2012. Consequently, PPL considers that this revision meets the requirements for the 10 CFR 50.71(e)(3)(iii) COLA update for both calendar years. However, interim revisions may be submitted as required in order to support the NRC's ongoing COLA review and ensure timely alignment is maintained with any interim revisions to the U.S. EPR Design Certification.

This COLA revision contains no Restricted Data or other defense information requiring separation in accordance with 10 CFR 50.33(j). Part 9 of this application contains certain financial and security-related information that PPL is requesting the NRC to withhold from public disclosure in accordance with the requirements of 10 CFR 2.390. An appropriate affidavit (Enclosure 3) is included with this letter supporting proprietary treatment of PPL financial information pursuant to 10 CFR 2.390(b).

A set of revised application documents is provided in electronic file format on the enclosed disk (Enclosure 2). Enclosure 2 contains both the publicly available version of the COLA revision with the information requested to be withheld from public disclosure redacted; and the non-public version with the information requested to be withheld from public disclosure included in Part 9. The enclosed disk is a black revision line version of the COLA. This disk supersedes those previously submitted as Revision 2 (Reference 1).

Issues that were addressed after the COLA Revision 3 input cut-off date of March 5, 2012 are not incorporated in COLA Revision 3 and will be reflected in a future revision of the COLA. These issues include RAI responses that are submitted after March 5, 2012, and also revisions related to U.S. EPR FSAR Revision 2 and 3 changes that require additional site specific engineering or analysis. The latter topics include:

- FSAR 2.4 and 2.5, Seismic Design Parameters and Foundations
 - COL Item 2.5-9 and parameters in Table 2.0-1
 - Engineering and analyses related to cut and fill reconciliation for the revised plant footprint are ongoing
- FSAR Sections 3.7 and 3.8, Seismic Analysis and Design
 - COL Items 3.8-18, 3.8-19 and 3.8-20
 - Seismic analyses in progress pending U.S. EPR FSAR seismic reconciliation
- FSAR 8.2, Change from 3 to 2 Normal Auxiliary Transformers
 - Engineering for some site specific buses and loads is ongoing
- FSAR 9.2.5, Emergency Service Water System and Ultimate Heat Sink
 - Engineering evaluation and design efforts for these systems are ongoing
 - COL Items 9.2-7, 9.2-8, 9.2-9, 9.2-10 and 9.2-11

- FSAR 9.4.4, Switchgear Building Ventilation System
 - Engineering and design efforts for this system are ongoing
 - COL Item 9.4-2
- FSAR 11.2 and 11.3, Liquid and Gaseous Release Points and Dilution Factors (FSAR 11.2.3)
 - Engineering analysis and design is ongoing
 - COL Items 11.2-2, 11.2-3, 11.2-4, 11.2-5, 11.3-2, 11.3-3, 11.3-4 and 11.3-5

The items identified above will be included in a future revision to the BBNPP COLA; the schedule for responses to RAIs relevant to the above topics was provided in Reference 6.

Appropriate pre-submission checks have been successfully performed on the enclosed disk to ensure compliance with the guidelines provided on the NRC website and they have been found acceptable for electronic submittal. The disk includes a "packing slip" describing its contents, pursuant to NRC instructions for electronic filing.

This submittal contains PDF files, one or more of which contains hyperlinks to other files or to the Internet. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

New regulatory commitments in this correspondence are listed in Enclosure 4.

Should you have questions, please contact the undersigned at 610.774.7552.

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

Executed on March 30, 2012.

Respectfully,



Rocco R. Sgarfo

RRS/kw

- Enclosures:
- 1) Summary of BBNPP COLA Revision 3 Changes
 - 2) Bell Bend Nuclear Power Plant COLA Revision 3 DVD (Public and Non-public)
 - 3) Affidavit
 - 4) List of Commitments

cc: (w/ Enclosures, Public Version of Enclosure 2)

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C. Rayburn
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M. Wysocki
J. Kirkwood

Enclosure 1

Summary of BBNPP COLA Revision 3 Changes

Summary of BBNPP COLA Revision 3 Changes

The format of the BBNPP COLA has been modified to match the template used in the U.S. EPR design center. This change makes the page headers and footers consistent.

Part 1, General Information:

COLA Part 1 was updated to include changes in ownership, ownership structure, officers, and financial information.

Part 2, FSAR (FSAR):

BBNPP FSAR was updated to include changes from the U.S. EPR FSAR, Revisions 2 and 3. Additional changes include:

- Incorporation of changes as a result of changes to the site plot plan.
- Incorporation of previously submitted responses to Requests for Additional Information
- Editorial corrections (various)

Part 3, Environmental Report (ER):

Changes to the ER primarily reflect incorporation of changes provided on December 19, 2011, including incorporation of changes as a result of changes to the site plot plan. Additional changes include:

- Incorporation of previously submitted response to Requests for Additional Information¹
- Editorial corrections (various)

Part 4, Technical Specifications (TS):

BBNPP Technical Specifications were updated to include changes from the U.S. EPR FSAR, Revisions 2 and 3. Additional changes include:

- Incorporation of previously submitted responses to Requests for Additional Information
- Editorial corrections (various)

Part 5, Emergency Plan:

Changes to COLA Part 5 include:

- Incorporation of updated Evacuation Time Estimate study in response to Requests for Additional Information and site plot plan change.
- Incorporation of other changes as a result of changes to the site plot plan.
- Incorporation of previously submitted responses to Requests for Additional Information
- Editorial corrections (various)

Part 6, LWA:

No changes.

¹ BNP-2010-251, Rocco R. Sgarro (PPL Bell Bend, LLC) to Document Control Desk (NRC), "Partial Response to Environmental Requests for Additional Information 5022, 5024, 5033 & 5043 and Schedule Information," dated October 7, 2010.

Summary of BBNPP COLA Revision 3 Changes (cont'd)

Part 7, Departures and Exemptions:

BBNPP COLA Part 7 was updated to include changes from the U.S. EPR FSAR, Revisions 2 and 3. Additional changes include:

- Incorporation of previously submitted responses to Requests for Additional Information
- Removal of the following departures:
 - Exclusion Area Boundary
 - Toxic Gas Detection and Isolation
 - Generic Technical Specifications and Bases
- Update of the following departures:
 - Maximum Annual Average Atmospheric Dispersion Factor (Limiting Sector)
 - Accident Atmospheric Dispersion Factor
- Addition of the following departures:
 - Setpoint Control Program
 - Ultimate Heat Sink Makeup Flow Rate
 - Radiological Consequences of Design Basis Accidents
 - Reactor Coolant Pump Seizure event
 - Inadvertent Loading and Operation of a Fuel Assembly in an Improper Position
 - Technical Specification Bases for RCS Primary to Secondary Leakage
 - Technical Specification for Decay Time Prior to Fuel Movement
- Removal of the following exemption requests:
 - Exclusion Area Boundary
 - Fitness for Duty
 - Toxic Gas Detection and Isolation
- Update of the following exemption requests:
 - Maximum Annual Average Atmospheric Dispersion Factor (Limiting Sector)
 - Accident Atmospheric Dispersion Factor
- Addition of the following exemption requests:
 - Setpoint Control Program
 - Ultimate Heat Sink Makeup Flow Rate
- Editorial corrections (various)

Part 8, Security Plan:

Changes submitted previously under separate cover² (not included with this submittal).

²BNP-2011-038, Terry L. Harpster (PPL Bell Bend, LLC) to Document Control Desk (NRC), "Physical Security Plan," dated March 1, 2011.

Summary of BBNPP COLA Revision 3 Changes (cont'd)

Part 9, Proprietary and SUNSI:

COLA Part 9 was updated to include changes in the following:

- Update of financial information in COLA Part 1.
- Removal of FSAR Figure 9B-24 from COLA Part 9 and relocation to the FSAR.
- Removal of ER 3.4-4 from COLA Part 9 and relocation to the ER.
- Addition of ER Figures 3.4-8 and 3.4-9 to COLA Part 9.
- Addition of archaeological sites from the Cultural Resources study to COLA Part 9.
- Update of the description of mineral resources in ER Section 2.2.1.

Part 10, ITAAC:

BBNPP COLA Part 10 was updated to include changes from the U.S. EPR FSAR, Revisions 2 and 3. Additional changes include:

- Incorporation of previously submitted responses to Requests for Additional Information.
- Editorial corrections (various)

Part 11:

Changes include:

- Quality Assurance Plan revision
- Update of reference for U.S. EPR FSAR, Revision 3
- Update of references to NEI Documents
- Incorporation of Phase II Historic Property Report
- Incorporation of Cultural Resources Survey
- Update of Terrestrial Ecology Studies (Wetlands Delineation, Field Survey of Plant Communities)
- Update of Impingement and Entrainment Sampling Study
- Update of Aquatic Ecology Studies (Mussels, Fish and Benthos)
- Update of Traffic Impact Study
- Incorporation of Cyber Security Plan.

Enclosure 2

Bell Bend Nuclear Power Plant COLA Revision 3 DVD

(Public and Non-public)

Enclosure 3

Affidavit

AFFIDAVIT OF ROCCO R. SGARRO

COMMONWEALTH OF PENNSYLVANIA)

) ss

COUNTY OF LEHIGH)

I, Rocco R. Sgarro, Director, Regulatory Affairs, PPL Bell Bend, LLC, do hereby affirm and state:

- 1) I am authorized to execute this affidavit on behalf of PPL Bell Bend, LLC. I am further authorized to review information submitted to the Nuclear Regulatory Commission (NRC) and apply for the withholding of information from disclosure. I am making this affidavit in conformance with the provisions of the NRC's regulations at 10 CFR 2.390 and in support of PPL Bell Bend, LLC's request for proprietary treatment of certain financial information.
- 2) I have knowledge of the criteria used by PPL Bell Bend, LLC in designating information as sensitive, proprietary, or confidential.
- 3) Pursuant to the provision of paragraph (a)(4) of 10 CFR 2.390, the following is furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - a. The information sought to be withheld from public disclosure is owned by PPL Bell Bend, LLC, its affiliates or third parties to whom PPL Bell Bend has an obligation to maintain its confidentiality and has been held in confidence by PPL Bell Bend, LLC.
 - b. The information sought to be protected is not available to the public to the best of my knowledge and belief.
 - c. The information is of the type that would customarily be held in confidence by PPL Bell Bend, LLC. The information that PPL Bell Bend, LLC is requesting to be withheld from public disclosure is PPL Bell Bend, LLC's cost projections for construction, fuel supply, and operating costs for the Bell Bend Nuclear Power Plant. PPL Bell Bend, LLC limits access to these cost projections to those with a "need to know" subject to maintaining confidentiality. Public disclosure of these cost projections is likely to harm PPL Bell Bend, LLC because it would allow other contractors, vendors, and competitors to understand PPL Bell Bend, LLC's competitive expectations and position prior to securing necessary contracts and services at competitive prices.
 - d. The proprietary information sought to be withheld from public disclosure is identified in Part 9 of the COL application revision and is marked as proprietary as it appears in the application.
 - e. The information is transmitted to the NRC in confidence and under the provisions of 10 CFR 2.390; it is to be received in confidence by the NRC.

Rocco R. Sgarro, being duly sworn, states that he is Director, Regulatory Affairs, PPL Bend, LLC, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this revision to the combined license application for the Bell Bend Nuclear Power Plant, and that all the matter and facts set forth herein are true and correct to the best of his knowledge.

Rocco R. Sgarro

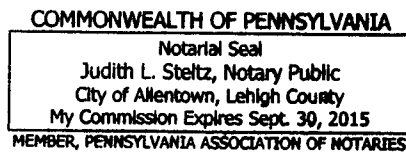
Rocco R. Sgarro
Director, Regulatory Affairs
PPL Bell Bend, LLC

Subscribed and sworn to before me, a Notary Public, in and for the county and Commonwealth above named, this 30th day of March, 2012.

Judith L. Steltz

Notary Public in and for Commonwealth of Pennsylvania

My Commission Expires: *Sept. 30, 2015*



Enclosure 4

List of Commitments

List of Commitments

The following table identifies those actions committed to by PPL in this document. Any other statements in this document are provided for information purposes and are not considered commitments.

ID Number	Commitment	Due
BB-12-0018	Provide a response to COL Item 2.5-9 (Seismic Design Parameters) and provide values for affected parameters in Table 2.0-1.	Future revision to the BBNPP COLA
BB-12-0019	Update FSAR 2.4 and 2.5 to include cut and fill engineering and analysis results.	Future revision to the BBNPP COLA
BB-12-0020	Update FSAR 3.7 and 3.8 to include seismic analysis and reconciliation results.	Future revision to the BBNPP COLA
BB-12-0021	Provide a response to COL Items 3.8-18, 3.8-19 and 3.8-20.	Future revision to the BBNPP COLA
BB-12-0022	Update FSAR Chapter 8 to reflect the change from three Normal Auxiliary Transformers to two.	Future revision to the BBNPP COLA
BB-12-0023	Provide a response to COL Items 9.2-4, 9.2-5 and 9.2-9 related to UHS and Essential Service Water System chemistry and materials.	Future revision to the BBNPP COLA
BB-12-0024	Evaluate the impact of the revised post-accident heat load (U.S. EPR FSAR Table 9.2.5-1) on the BBNPP UHS Cooling tower and provide a response for COL Items 9.2-7, 9.2-8, 9.2-9, 9.2-10 and 9.2-11.	Future revision to the BBNPP COLA
BB-12-0025	Update FSAR 9.4 to provide a description of the Switchgear Building Ventilation System and provide a response to COL Items 9.4-2.	Future revision to the BBNPP COLA
BB-12-0026	Update FSAR 11.2 and 11.3 to provide a description of gaseous and liquid release pathways and provide a response for COL Items 11.2-2, 11.2-3, 11.2-4, 11.2-5, 11.3-2, 11.3-3, 11.3-4 and 11.3-5.	Future revision to the BBNPP COLA