



November 7, 2012

**Submitted Pursuant to:
10 CFR 2.390**

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

**BELL BEND NUCLEAR POWER PLANT
SUPPLEMENTAL RAI RESPONSE FOR ENV-11
OPTICAL STORAGE MEDIA TRANSMITTAL
BNP-2012-269 Docket No. 52-039**

References: 1) BNP-2012-199, R. R Sgarro (PPL Bell Bend, LLC) to U.S. NRC, "Response to Draft ER RAIs," dated August 27, 2012.

2) BNP-2012-213, R. R Sgarro (PPL Bell Bend, LLC) to U.S. NRC, "Status of ER RAI Responses," dated September 7, 2012.

The purpose of this letter is to provide supplemental information and reference materials related to Request for Information (RAI) ENV-11.

The initial response to the requests included in ENV-11 was provided in the responses to Draft RAI RHH-04 (Reference 1). PPL Bell Bend, LLC (PPL) provided the NRC with a cross-reference table of Draft RAI responses and corresponding Final RAIs in Reference 2. As indicated in Reference 2, RHH-4 corresponds to RAI ENV-11. In conjunction with the materials submitted in response to RAI 116 in correspondence BNP-2012-262 of October 19, 2012, this letter provides the remainder of response materials associated with RAI ENV-11.

A disc containing the following data files and calculations supporting PPL's response to ENV-11 (formerly Draft RAI RHH-04) as requested by NRC is included as Enclosure 1 to this letter. Data files supporting RAI-116 which indirectly support RAI ENV-11 are also included within this submittal as described below.

Data files for ENV-11/Draft RAI RHH-04 (which relates to ER 5.4):

- 32-7012419-001, "BBNPP Construction Worker Dose given Susquehanna Effluents to 2011 and 105 HSM in the ISFSI," October 2012.

The following supporting spreadsheets are also included:

- 32-7012419-001.xls
- 32-7012419-001-results.xls
- 32-7012419-001-load.xls
- 32-7012419-000.xls
- 32-7012419-000-13S2.xls
- 32-7012419-000-results.xls
- 32-9084974-003-no-fig.xls

- 32-9082288-001, "BBNPP Dose Rate Equation for SSES ISFSI," September 2008.

D102
NRD

The following supporting spreadsheet is also included:

-BB_ISFSI_mht

- 32-9084355-004, "Offsite Dose Compliance at BBNPP," October 2012.

Data Files for RAI 116 (which relate to ER 4.5) but are not directly related to RHH-04:

- 32-9074035-001, "Dose to a Construction Worker at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," June, 2012.

The following supporting LADTAP II input/output files are also included:

-SSES01.inp
-SSES01.out
-SSES02.inp
-SSES02.out
-SSES03.inp
-SSES03.out
-SSES04.inp
-SSES04.out
-SSES05.inp
-SSES05.out
-SSES06.inp
-SSES06.out
-sses07.inp
-sses07.out
-sses08.inp
-sses08.out
-sses09.inp
-sses09.out
-sses10.inp
-sses10.out
-sses11.inp
-sses11.out

- 32-7012208-000, "BBNPP TEDE Constant for Normal Gaseous Effluents 2007 to 2011," June, 2012.

The following AIRAD/ATMODOS output files are also included:

-07run.txt
-08run.txt
-09run.txt
-10run.txt
-11run.txt

- 32-9079799-001, "BBNPP Dose Rate Equation for Normal Gaseous Effluents,": August, 2008.


The enclosed files contain proprietary information for use in the response to RAI ENV-11 (formerly Draft RAI RHH-04). On behalf of AREVA NP, Inc., the preparer of this material, PPL requests that the NRC withhold the proprietary information from public disclosure in accordance with the requirements of 10 CFR 2.390. Enclosure 2 is an affidavit supporting the request to withhold the information from public disclosure.

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

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

Executed on November 7, 2012

Respectfully,



Rocco R. Sgarro

RRS/kw

Enclosures: 1) Proprietary data files associated with ENV-11 (on disc)
2) Affidavit from AREVA NP, Inc.

cc: (w/ Enclosures)

Ms. Laura Quinn-Willingham
Project Manager
U.S. Nuclear Regulatory Commission
11545 Rockville Pike Mailstop: T-6 C32
Rockville, MD 20852

(w/o Enclosures)

Mr. William Dean
Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

Enclosure 1

**Proprietary data files associated with ENV-11 (formerly Draft RAI RHH-04)
(Disc)**

Enclosure 2

Affidavit from AREVA NP, Inc.

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
COUNTY OF CAMPBELL)

1. My name is Russell D. Wells. I am U.S. EPR COLA Licensing Manager for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in "Data Files For ER NFI RHH-04" and referred to herein as "Documents" (refer to Attachment 1 for a listing of the Documents). Information contained in these Documents have been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. These Documents contain information of a proprietary and confidential nature and are of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in these Documents as proprietary and confidential.

5. These Documents have been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in these Documents be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure

is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information".

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

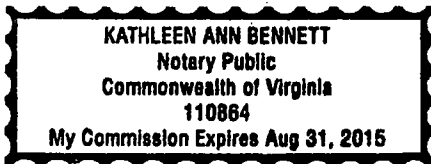
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Wells

SUBSCRIBED before me this *2nd*
day of November, 2012.

Kathleen A. Bennett

Kathleen A. Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/2015
Registration No. 110864



Attachment 1

Data files for RHH-04 (which relates to ER 5.4):

- 32-7012419-001, "BBNPP Construction Worker Dose given Susquehanna Effluents to 2011 and 105 HSM in the ISFSI," October 2012. The following supporting spreadsheets are also included:
 - 32-7012419-001.xls
 - 32-7012419-001-results.xls
 - 32-7012419-001-load.xls
 - 32-7012419-000.xls
 - 32-7012419-000-13S2.xls
 - 32-7012419-000-results.xls
 - 32-9084974-003-no-fig.xls
- 32-9082288-001, "BBNPP Dose Rate Equation for SSES ISFSI," September 2008. The following supporting spreadsheet is also included:
 - BB_ISFSI_mht
- 32-9084355-004, "Offsite Dose Compliance at BBNPP," October 2012.

Data files for RAI 116 (which relates to ER 4.5), but is not directly related to RHH-04:

- 32-9074035-001, "Dose to a Construction Worker at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," June 2012. The following supporting LADTAP II input/output files are also included:
 - SSES01.inp
 - SSES01.out
 - SSES02.inp
 - SSES02.out
 - SSES03.inp
 - SSES03.out
 - SSES04.inp
 - SSES04.out
 - SSES05.inp
 - SSES05.out
 - SSES06.inp
 - SSES06.out
 - sses07.inp
 - sses07.out
 - sses08.inp
 - sses08.out
 - sses09.inp
 - sses09.out

- sses10.inp
- sses10.out
- sses11.inp
- sses11.out
- 32-7012208-000, "BBNPP TEDE Constant for Normal Gaseous Effluents 2007 to 2011,"
June 2012. The following AIRAD/ATMODOS output files are also included:
 - 07run.txt
 - 08run.txt
 - 09run.txt
 - 10run.txt
 - 11run.txt
- 32-9079799-001, "BBNPP Dose Rate Equation for Normal Gaseous Effluents,"
August 2008.