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October 19, 2012

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

**BELL BEND NUCLEAR POWER PLANT
SUPPLEMENTAL RAI RESPONSE FOR ENV-10 AND ENV-11
OPTICAL STORAGE MEDIA TRANSMITTAL
BNP-2012-262 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 RAIs ENV-10 and ENV-11.

The initial response to the requests included in RAIs ENV-10 and ENV-11 was provided in the responses to Draft RAIs RHH-1, RHH-8, RHH-10, and RHH-11 (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-1, RHH-8, RHH-10, and RHH-11 correspond to RAIs ENV-10 and ENV-11.

A disc containing data files and calculations supporting PPL's response to ENV-10 and ENV-11 as requested by NRC is included as Enclosure 1 to this letter.

The disc contains the following files:

RAI ENV-10 (Formerly Draft RAIs RHH-01/RHH-11)

- 32-9084600-001, "Dose to Construction Workers at Bell Bend from Skyshine and Direct Sources at SSES Units 1 & 2." August 2008.
- 32-7012208-000, "BBNPP TEDE Constant for Normal Gaseous Effluents 2007 to 2011," June 2012.
- 32-9074035-000, "Dose to Construction Workers at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," April, 2008.
- 32-9074035-001, "Dose to Construction Workers at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," June, 2012.
- 32-9084874-003, "Dose to Construction Workers at the Bell Bend Nuclear Power Plant from Susquehanna Normal Operations." July 2010.
- 32-9082288-001, "BBNPP Dose Rate Equation for SSES ISFSI." September, 2008.
- 32-9079799-001, "BBNPP Dose Rate Equation for Normal Gaseous Effluents." August 2008.

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ENV-11 (Formerly Draft RAI RHH-08)

- 126-9048674-005, "US EPR Annual Occupational Dose Estimation" March, 2008.
- 126-9070954-005, Agricultural Production and Radiological Exposure Pathway Data for Bell Bend Nuclear Power Plant 1 " June, 2012.

ENV-11 (Formerly Draft RAI RHH-10)

- 32-9077003-003, "Annual Offsite Dose to Individuals from Gaseous Effluent Releases from the U.S. EPR for Bell Bend Nuclear Power Plant," June, 2012.
- 32-9079961-003, "Annual Offsite Dose to Individuals and Populations from Liquid Effluent Releases from the U.S. EPR at BBNPP," June, 2012.
- 32-9077531-003, "Calculation of the Annual Offsite Population Dose from Gaseous Releases of the U.S. EPR at Bell Bend," June, 2012.
- 32-9080953-003, "Technical Input for COLA ER Section 5.4.4 for BBNPP (Dose to Biota)," June, 2012.
- 32-9076634-002, "Direct Dose at the Owner Controlled Area Boundary for ER Section 5.4 for BBNPP," February, 2011.
- 32-9084355-003, "Offsite Dose Compliance at BBNPP," June, 2012.
- 32-9085889-004, "Radioactive Waste System Cost Benefit Evaluation for Bell Bend Nuclear Power Plant," June, 2012.


Th enclosed files contain proprietary information for use in the response to RAIs ENV-10 and ENV-11 (formerly Draft RAIs RHH-01 / RHH-11, RHH-08, and RHH-10). 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 is 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 October 19, 2012

Respectfully,



Rocco R. Sgarro

RRS/kw

Enclosures: 1) Proprietary data files associated with ENV-10 and 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 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 "Need for Information RHH-01, RHH-08, RHH-10, RHH-11 Data Files and MET-05 Input/Output Files" 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.

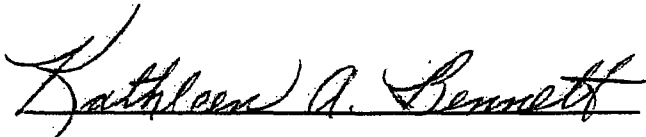
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in these Documents have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited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

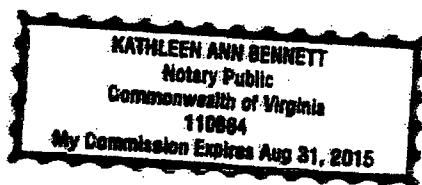
9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this *29th*
day of August, 2012.



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



Attachment 1

RHH-01/RHH-11

- 32-9084600-001, "Dose to Construction Workers at Bell Bend from Skyshine and Direct Sources at SSES Units 1 & 2." August 2008
- 32-7012208-000, "BBNPP TEDE Constant for Normal Gaseous Effluents 2007 to 2011," June 2012.
- 32-9074035-000, "Dose to Construction Workers at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," April, 2008
- 32-9074035-001, "Dose to Construction Workers at the Bell Bend Nuclear Power Plant Shoreline Due to Susquehanna Liquid Effluents," June, 2012
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- 32-9082288-001, "BBNPP Dose Rate Equation for SSES ISFSI." September, 2008
- 32-9079799-001, "BBNPP Dose Rate Equation for Normal Gaseous Effluents." August 2008

RHH-08

- 126-9048674-005, "US EPR Annual Occupational Dose Estimation" March, 2008.
- 126-9070954-005, Agricultural Production and Radiological Exposure Pathway Data for Bell Bend Nuclear Power Plant 1" June, 2012.

RHH-10

- 32-9077003-003, "Annual Offsite Dose to Individuals from Gaseous Effluent Releases from the U.S. EPR for Bell Bend Nuclear Power Plant," June, 2012.
- 32-9079961-003, "Annual Offsite Dose to Individuals and Populations from Liquid Effluent Releases from the U.S. EPR at BBNPP," June, 2012.
- 32-9077531-003, "Calculation of the Annual Offsite Population dose from Gaseous Releases of the U.S. EPR at Bell Bend," June, 2012.
- 32-9080953-003, "Technical Input for COLA ER Section 5.4.4 for BBNPP (Dose to Biota)," June, 2012.
- 32-9076634-002, "Direct Dose at the Owner Controlled Area Boundary for ER Section 5.4 for BBNPP," February, 2011.
- 32-9084355-003, "Offsite Dose Compliance at BBNPP," June, 2012.

- 32-9085889-004, "Radioactive Waste System Cost Benefit Evaluation for Bell Bend Nuclear Power Plant," June, 2012.

MET-05

- AEOLUS3 Input/Output Files

Enclosure 1

Proprietary data files associated with ENV-10 and ENV-11
(Disc)