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May 16, 2013

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

BELL BEND NUCLEAR POWER PLANT
RESPONSE TO RAI NO. 123 QUESTIONS
08.01-2 PART 1 AND 08.03.01-7 PART 5 AND
SCHEDULE INFORMATION
BNP-2013-073 Docket No. 52-039

Reference: M. Canova (NRC) to R. R. Sgarro (PPL Bell Bend, LLC), Bell Bend COLA – Final Request for Information No. 123 (RAI No. 123) – NRR/EEEB 6830, 6767, 6768, 6769, email dated March 25, 2013

The purpose of this letter is to provide the PPL Bell Bend, LLC (PPL) response to the Request for Additional Information (RAI) identified in the Reference. This RAI addresses Electric Power as discussed in in FSAR Sections 8.1, 8.2 and 8.3 of the Bell Bend Nuclear Power Plant (BBNPP) Combined License Application (COLA).

The Enclosure provides our responses to RAI No. 123, Questions 08.01-2 Part 1, and 08.03.01-7 Part 5, which include revised COLA content. The revised COLA content will be included in a future revision of the BBNPP COLA.

PPL requires additional time to provide responses to RAI No. 123 Questions: 08.01-2 Part 2; 08.02-11; 08.02-12 Parts 1, 2, and 3; and, 08.03.01-7 Parts 1, 2 and 4. The schedule for the responses or condition to provide a schedule are as listed in the below table.

The only new commitments in this letter are to provide responses or a schedule for a response as listed in the below table on or before the date shown and to provide a future revision of the COLA.

RAI 123 Question	Response Date
08.01-2, Part 2	April 1, 2014
08.02-11	Schedule will be submitted following U.S. EPR response to RAI 564
08.02-12, Part 1	April 1, 2014
08.02-12, Part 2	February 15, 2014
08.02-12, Part 3	October 1, 2013
08.03.01-7 Part 1,	April 1, 2014
08.03.01-7 Part 2	April 1, 2014
08.03.01-7 Part 4	April 1, 2014

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NRO

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 May 16, 2013

Respectfully,

Rocco R. Sgarro

RRS/kw

Enclosure: As stated

cc: (w/ Enclosure)

Mr. Michael Canova
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(w/o Enclosure)

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Enclosure

Response to RAI No. 123,
Questions 08.01-2 Part 1 and 08.03.01-7 Part 5

RAI No. 123
Question 08.01-2 Part 1

Correct the references (i.e., Tables 8.3-13 through 8.3-16) of US EPR FSAR (Rev. 3) cited in BBNPP FSAR Section 8.1.3 (Page 8-2), as those references have been changed from Rev. 2 of US EPR FSAR thru Rev. 4.

Response

Bell Bend Nuclear Power Plant FSAR Chapter 8 Section 8.1.3 is being revised to reflect the referenced U.S. EPR FSAR Revision 04 table numbering.

COLA Impact
The BBNPP FSAR is being revised as follows:

8.1.3 Safety-Related Loads

The U.S. EPR FSAR includes the following COL Item in Section 8.1.3:

> A COL applicant that references the U.S. EPR design certification will identify site-specific loading differences that raise the EDG or Class 1E battery loading and demonstrate the electrical distribution system is adequately sized for the additional load.

This COL Item is addressed as follows:

{The loads powered from the safety-related sources for the U.S. EPR are specified in U.S. EPR FSAR Tables 8.3-4, 8.3-5, 8.3-6, and 8.3-7. Additional site-specific loads powered from the station EDGs are specified in Table 8.1-1, Table 8.1-2, Table 8.1-3, and Table 8.1-4. This information supplements U.S. EPR FSAR Tables 8.3-4, 8.3-5, 8.3-6, and 8.3-7. The site-specific loads are within the design margin of the EDGs. Onsite DC power system nominal load values are specified in U.S. EPR FSAR Tables ~~8.3-12~~ 8.3-13 through ~~8.3-15~~ 8.3-16. Additional site-specific loads from the Class 1E battery source include an additional feeder breaker on the 31/2/3/4BDD bus that provides electrical power to the 6.9 kV to 480 V ESWEMS transformers. Each of these feeder breakers requires steady state control power of 0.04 kW. The site-specific Class 1E control power demand is within the design margin of the EUPS Battery Sizing Calculation and does not change the DC load requirements specified in the U.S. EPR FSAR Tables ~~8.3-12~~ 8.3-13 through ~~8.3-15~~ 8.3-16.}

Question 08.03.01-7 Part 5

Staff request following information:

5. COL information item 8.3-2 requires developing inspection, testing, and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, and other systems that are within the scope of 10 CFR 50.65. In BBNPP Section 8.3.1.1.8, it indicated that "the installation of site-specific and underground power cables (described in the US EPR FSAR that is within the scope of 10 CFR 50.65) will be tested as a part of routine maintenance. If the test finds any negative trends, the tested cables are identified and track in the corrective action process." Explain why this is not a departure (i.e., developing programs vs. testing as a part of maintenance rule) from US EPR FSAR.

Response

Bell Bend Nuclear Power Plant FSAR Chapter 8 Section 8.3.1.1.8 is being revised to reflect the programmatic approach to monitoring inaccessible or underground power cables that are within the scope of 10 CFR 50.65.

COLA Impact

The BBNPP Part 2 FSAR will be revised as a result of the response to this question:

8.3.1.1.8 Raceway and Cable Routing

{Each group is separated by placing the AC power distribution equipment in the divisional Safeguards Building, Essential Service Water Pump Building, ESWEMS Pump House, and Diesel Building.}

The U.S. EPR FSAR includes the following COL Item in Section 8.3.1.1.8:

> A COL applicant that references the U.S. EPR design certification will describe inspection, testing, and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, and other systems that are within the scope of 10 CFR 50.65.

This COL Item is addressed as follows:

~~{The site-specific cables routed in buried electrical duct banks within the scope of 10 CFR 50.65 traverse from each Essential Service Water Building to the ESWEMS Pump House. The insulation of site-specific and underground power cables described in the U.S. EPR FSAR that is within the scope of 10 CFR 50.65 will be tested as part of routine maintenance. Any negative trends of the tested cables are identified and tracked in the corrective action process, which includes extent of condition considerations. The raceway and cable routing design, including load group segregation and other design aspects described in U.S. EPR FSAR, Section 8.3.1.1.8 is incorporated by reference.}~~

Prior to initial fuel load, a cable management program shall be put in place that includes the essential elements of a program that:

- ♦ Identify the inaccessible or underground cables that are within the scope of 10 CFR 50.65,
- ♦ Describe the inspection, testing, and monitoring programs that will be implemented to detect degradation of these cables.

The BBNPP Part 10 ITAACs will be revised as a result of the response to this question:

2. COL ITEMS

There are several COL items that can not be resolved prior to issuance of the Combined License. The referenced U.S. EPR FSAR and the COL application FSAR together: 1) justify why each of these COL items can not be resolved before the COL is issued; 2) provides sufficient information on these items to support the NRC licensing decision; and 3) identifies an appropriate implementation milestone. Therefore, in accordance with the guidance in Regulatory Guide 1.206, Section C.III.4.3, the following Combined License Condition is proposed to address these COL items.

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COL Item 8.3-1 in Section 8.3.1.1.5

Prior to initial fuel load, {PPL Bell Bend, LLC} shall establish procedures to monitor and maintain Emergency Diesel Generator reliability to verify the selected reliability level goal of 0.95 is being achieved as intended by Regulatory Guide 1.155.

COL Item 8.3-2 in Section 8.3.1.1.8

Prior to initial fuel load, a cable management program shall be put in place that includes the essential elements of a program that:

- ♦ Identify the inaccessible or underground cables that are within the scope of 10 CFR 50.65,
- ♦ Describe the inspection, testing, and monitoring programs that will be implemented to detect degradation of these cables.