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

BELL BEND NUCLEAR POWER PLANT INTERIM SAFETY REVIEW GUIDANCE BNP-2014-005 Docket No. 52-039

The purpose of this letter is to provide the staff with PPL's interim guidance regarding application of NRC review resources to PPL's Combined License Application (COLA) for the Bell Bend Nuclear Power Plant (BBNPP), which references the AREVA U.S. EPR Design Certification (DC) Final Safety Analysis Report (FSAR).

As the staff is aware based on several public meetings, AREVA is working diligently to resolve a number of technical issues on their DC application, and has developed a closure plan strategy to prioritize and guide these activities. AREVA's closure plan remains under development, and has PPL's full support. However, given that the schedule for design certification has taken much longer than originally anticipated and remains uncertain, PPL is opting at this time to monitor progress on the DC application and UniStar's Reference COLA (Calvert Cliffs Unit 3) before expending further significant resources on the safety review.

Accordingly, PPL respectfully requests that the NRC withhold further review of the BBNPP COLA Part 2 (FSAR) until further notice. This request also applies to Part 4 (Technical Specifications), Part 8 (Security Plan) and Part 10 (ITAAC). Based on discussion with the staff, it is PPL's understanding that staff review of Part 5 (Emergency Plan) is nearing completion, and we support completion of that task.

PPL is not requesting a formal suspension of the BBNPP COLA review, but a hiatus in the safety review which will allow time for the review process to approach the original Part 52 premise of having both the DC and RCOL available for use in streamlining the review of subsequent COLAs.

With regard to the delay in the review of COLA Parts 2, 4, 8 and 10, PPL currently anticipates working with the NRC to resume the review in these areas in late 2015. Sufficient notice will be provided to the NRC at that time to allow for staff and contractor resource planning and allocation.

PPL fully understands that implementation of this request will impact the BBNPP COLA safety review schedule; however, we believe that this impact will be tempered through substantial progress by AREVA and UniStar that will apply to BBNPP as an S-COLA. In the intervening period, we will continue to endorse the Reference COLA RAI responses when appropriate.

At this time, PPL's primary focus will continue to be completion of the necessary work to support staff issuance of a Draft Environmental Impact Statement on Bell Bend for public comment, leading to issuance of the Final Environmental Impact Statement.

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

Respectfully,

Rocco R. Sgarro

RRS/kw

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