



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

June 4, 2003

Mr. Chip Hannah
Tennessee Department of Environment & Conservation
Division of Water Pollution Control
Enforcement & Compliance Section
Sixth Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-0455

Dear Sir:

**WATTS BAR NUCLEAR PLANT (WBN) - NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES) PERMIT NO. TN0020168 - RESPONSE TO NOTICE OF
VIOLATION**

This letter is in response to a Notice of Violation letter dated May 6, 2003, see attached letter. As indicated with the DMR, this was an "upset". WBN notified the Chattanooga Environmental Assistance Center and followed up with a written confirmation within one week. The March 7, 2003 written confirmation to the Environmental Assistance Center is also attached for your review. Therefore, WBN respectfully requests TDEC to resend the Notice of Violation dated May 6, 2003.

If you should have any questions or need additional information, please contact Robert J. Crawford at (423) 365-8005 at Watts Bar.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Edward R. Robinson
Radwaste/Environmental Superintendent

Enclosures

cc (Enclosures):

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Tennessee Department of Environment & Conservation
Division of Water Pollution Control
Environmental Assistance Center
540 McCallie Avenue, Suite 550
Chattanooga, Tennessee 37402



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER POLLUTION CONTROL
ENFORCEMENT AND COMPLIANCE SECTION
401 CHURCH STREET, 6TH FLOOR, ANNEX
NASHVILLE, TN 37243-0455

May 06, 2003

CERTIFIED MAIL

Mr. Robert J. Crawford
TVA - Watts Bar Nuclear Plant
P.O. Box 2000
Spring City, TN 373812000

Re: **Notice of Violation**
NPDES Permit #TN0020168
TVA - Watts Bar Nuclear Plant
Rhea County, Tennessee

Dear Mr. Crawford:

This letter serves as a Notice of Violation. The Division of Water Pollution Control has reviewed the Discharge Monitoring Reports (DMRs) for TVA - Watts Bar Nuclear Plant and found the violation(s) of permit terms, shown on the attached report.

The Division of Water Pollution Control requires a written explanation of the violation(s) summarized on the attached report within 30 days, if you did not submit an explanation with the DMR. The explanation must include the reason for the violation(s) and the corrective action taken to avoid future violation(s). The explanation should be sent to the attention of Mr. Chip Hannah at the address shown in the letterhead.

Your facility is subject to enforcement action due to non-compliance with permit terms. However, your explanation will be considered prior to further action from this Division. If you have questions or concerns regarding this correspondence, contact Mr. Chip Hannah at (615) 532-0683.

Sincerely,

Christopher S. Moran, Section Manager

cc: Chattanooga Environmental Assistance Center
Compliance File

NPDES Permit 0020168
TVA - Watts Bar Nuclear Plant
Rhea County, Tennessee

May 06, 2003
Facility Type: Major Industrial
WPC Staff: Mr. Chip Hannah

SUMMARY OF VIOLATIONS

Discharge Monitoring Reports (DMRs) for 02/01/2003 through 02/28/2003.

Outfall	Parameter	Reported Value	Permit Limit	Unit Code	Statistical Base	Violation Type	Explanation Received with DMR
111	Total Suspended Solids (as TSS)	66	45	MG/L	Daily Maximum	Numeric Violation	<input checked="" type="checkbox"/>

**NOTICE OF UPSET
NPDES PERMIT TN0020168
WATTS BAR NUCLEAR PLANT**

February 16, 2003

Outfall 111: Treated Sanitary Wastewater

According to the criteria found in NPDES permit No. TN0020168 Part II C 4, an upset occurred at the Sewage Treatment Plant on February 16, 2003 due to heavy rain and flooding conditions. According to operator logs, rain totaled approximately 7 inches over the February 14th weekend and flooding conditions occurred at Plants A & B but no "washout" occurred. The heavy rains also caused flooding conditions for the Construction Runoff Holding Pond, OSN 112. Flood waters backed up into the Sewage Treatment Plant effluent box. During the time of the upset, the facility was operated in a prudent and workman-like manner and was in compliance with proper operation and maintenance procedures. Conversations with the licensed operator indicate that this was beyond the reasonable control of WBN and no actions could have been taken to stop the flooding of the effluent box.

The upset lead directly to a high Total Suspended Solids (TSS) concentration for the sample collected on February 19, 2003 at 09:50 a.m. Sample results revealed a Total Suspended Solids (TSS) concentration of 66 mg/L. The daily maximum permit limitation is 45 mg/L. Another sample was collected on February 25 at 07:20. The result of that analysis showed TSS was back within permit limits with a result of 3.9 mg/L. All other discharge and operating parameters during that time frame were well within permit limitations. This was an isolated event due to the heavy flooding conditions at WBN and not caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

A phone call was made to the Tennessee Department of Environment and Conservation, Chattanooga Field Office about the high TSS value and plant conditions the working day after WBN became aware the plant upset. A follow up letter was mailed within 5 days to the Chattanooga field office.



Tennessee Valley Authority, Post Office Box 2000, Spring City, Tennessee 37381-2000

March 7, 2003

Mr. Mike Kelley
Tennessee Department of Environment & Conservation
Division of Water Pollution Control
Environmental Assistance Center
540 McCallie Avenue, Suite 550
Chattanooga, Tennessee 37402-2013

Dear Mr. Kelley:

**WATTS BAR NUCLEAR PLANT (WBN) - NATIONAL POLLUTANT
DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. TN0020168 -
FOLLOW-UP TO NOTICE OF UPSET**

This letter is a follow-up to the phone call made on March 3, 2003 to your office about the TSS exceedance at WBN's Sewage Treatment Plant Effluent due to the heavy rain which began at WBN on the weekend of February 14th. Rain totaled approximately 7 inches over that weekend and flooding conditions occurred at Plants A & B but no "washout" occurred. In accordance with NPDES permit No. TN0020168 Part II C 4, WBN believes an upset occurred at the Sewage Treatment Plant on February 16, 2003. WBN meets the criteria found in Part II C 4 of the permit for the conditions of an upset. The cause was due to the heavy rains causing flooding conditions for the Construction Runoff Holding Pond, OSN 112, flooding and backing up into the Sewage Treatment Plant effluent box. During the time of the upset, the facility was operated in a prudent and workman-like manner and was in compliance with proper operation and maintenance procedures.

Mr. Mike Kelley
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March 7, 2003

The upset lead directly to a high Total Suspended Solids (TSS) concentration for the sample collected on February 19, 2003 at 09:50 a.m. Sample results were obtained on February 27, 2003 and revealed a Total Suspended Solids (TSS) concentration of 66 mg/L. The daily maximum permit limitation is 45 mg/L. Another sample was collected on February 25 at 07:20. The result of that analysis performed on February 26 at 09:35 a.m. resulted in a measurement of 3.9 mg/L. This value met the permit limit. All other discharge and operating parameters during that time frame were well within permit limitations. This was an isolated event due to the heavy flooding conditions at WBN and not caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

If you should have any questions or need additional information, please contact me at (423) 365-8005 or Martha Ervin at (423) 365-3585 at Watts Bar.

Sincerely,



Robert J. Crawford
Environmental Supervisor

cc: Tennessee Department of Environment and Conservation
Division of Water Pollution Control
Enforcement & Compliance Section
Sixth Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1534