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February 25, 2005

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10 CFR 51

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration, Mailstop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of	)	Docket Nos.	50-259
Tennessee Valley Authority	)		50-260
			50-296

TENNESSEE VALLEY AUTHORITY (TVA) COMMENTS ON DRAFT NUREG-1437 SUPPLEMENT 21 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR LICENSE RENEWAL OF THE BROWNS FERRY NUCLEAR PLANT (BFN), UNITS 1, 2, AND 3

Enclosed are TVA's comments on the subject document. TVA appreciates the opportunity to comment. This letter contains no new commitments.

If you have any questions about this information, please contact Chuck Wilson, Project Manager for BFN License Renewal Environmental Review, at (423) 751-6153 or clwilson@tva.gov.

Sincerely,

John C. Fornicola
Manager
Nuclear Assurance and Licensing

Enclosure
cc: See page 2

SISP Review Complete
Template - ADM-013

E-RIDS=ADM-03
Add = H. Nasdik (MTH2)

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ENCLOSURE

TVA COMMENTS ON NRC'S SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR BROWNS FERRY NUCLEAR PLANT (BFN) UNITS 1, 2, AND 3

Executive Summary

Page xx, Line 15: The statement is made that power generation alternatives are evaluated assuming that the replacement power generation plant is located at either the BFN site or some other unspecified alternative location. In contrast, Chapter 8 follows material supplied in TVA's Environmental Report which analyzes four different types of alternative power plants, all of which are analyzed at specified locations and none of which (for stated reasons) are at the BFN site.

Section 1.2.2 License Renewal Evaluation Process

Page 1-5, paragraph beginning Line 39: This paragraph makes no mention of how TVA, being a federal agency, fulfilled its own NEPA obligations by preparing a Supplemental Environmental Impact Statement for Browns Ferry License Renewal. As explained in a letter dated June 4, 2004, to NRC from TVA's Mark Burzynski, Manager of Nuclear Licensing, each of the 92 license renewal environmental issues listed in NRC's GEIS and summarized in 10 CFR 51, Subpart A, Appendix B, Table B-1, were reviewed by TVA's various subject matter experts that were involved in preparing TVA's SEIS and the subsequent Environmental Report submitted by TVA as part of its application for BFN license renewal.

Page 1-6, Line 6: The phrase "and its support organization" is not understood. To whom or what entity does this refer?

Section 2.1.2 Reactor Systems

Page 2-4, Line 26: The sentence beginning on this line would be clarified if it was changed to read, "Each unit was originally licensed for an output..."

Section 2.1.3 Cooling and Auxiliary Water Systems

Page 2-7, Line 7: Please check the number 8.75; this should possibly be 8.66.

Page 2-7, Line 18: The number 7800 is correct but TVA2003a may not be the correct reference (source).

Section 2.2.2 Water Use

Page 2-19, Line 22: The statement is made that "TVA has committed to rebuild the sixth cooling tower." To avoid any potential confusion with regulatory commitments, please replace the referenced statement with the following sentence:

"As reflected in the Record of Decision for the TVA Final Environmental Impact Statement (Federal Register Vol. 67, No. 117, pp. 41565 – 41569, June 18, 2002), TVA's decision was to adopt the agency-preferred alternative to refurbish and restart BFN Unit 1, to proceed with NRC license extensions for all three units at BFN, and to construct a single 20-cell linear mechanical draft cooling tower in the currently vacant position (tower 4) where a tower that was destroyed by an accidental fire in 1986 was never replaced. With EPU of Units 2 and 3 at 120 percent of the originally licensed power level and the rebuilding of this tower, the consumptive use of cooling water would therefore increase."

Page 2-20, Line 6: Without any statement about the frequency of low flow at the plant, the assertion that the intake water flow encompasses a significant fraction of the daily average river flow can be somewhat misleading. Based on historical data, daily average river flows as low as the intake water flow occur less than 0.3 percent of the time, and daily average flows as low as three times the intake water flow occur only about 10 percent of the time. More specific values are stated in Section 4.1.1, Page 4-13, lines 28 – 30 (7Q10 of 8700 cfs in NPDES permit rationale).

Page 2-20, Lines 9 through 12: The stated minimum daily average flows (if sufficient water is available) were implemented via TVA's Reservoir System Operation and Planning Review of 1990, and these target values were in place at the time of NRC's March 2004 site visit to gather environmental information. The target minimum river flows for BFN are now slightly different as a result of the ROD for the Reservoir Operations Study (May 19, 2004). The target minimum daily average flows now are 10,000 cfs July through September (same as before); 11,000 cfs December through March (higher than before); and 7,000 cfs otherwise (higher than before).

Section 2.2.5, Aquatic Resources

Page 2-41, Lines 19 through 22: The Alabama cave shrimp discussion should be moved to the federal endangered species section.

Section 2.2.6 Terrestrial Resources

Page 2-44, Line 14: The *Cornus* spp. parenthetic should be changed to *Cornus florida*.

Page 2-44, Paragraph beginning Line 37: To be more accurate, the second sentence should be revised to state, "There are numerous invasive plants in the area

(TVA2003a), of which TVA has identified 19 as high priority, including Chinese privet, Japanese honeysuckle, Japanese knotweed, and Nepal grass." Also, the scientific name is included parenthetically for some plants in this sentence but not for others, which is inconsistent.

Page 2-45, Line 5: The scientific name for black willow (*Salix nigra*) is not provided.

Page 2-46, Table 2-3, Line 10: The table caption would be more accurate as "Federally Listed Terrestrial Species Reported from Counties Associated with the Browns Ferry Nuclear Plant Site and its Transmission Line Corridors."

Page 2-47, Table 2-4, Line 5: The table caption would be more accurate as "Alabama State-Listed Terrestrial Species Reported from the Vicinity of the Browns Ferry Nuclear Plant and Associated Transmission Line Corridors."

Page 2-49, Table 2-4, Line 29: The specific epithet for dwarf filmy fern is *petersii*.

Page 2-50, Table 2-4, Line 3: The specific epithet for prairie trillium is *recurvatum*.

Page 2-50, Table 2-5, Line 10: The table caption would be accurate as "Mississippi State-Listed Terrestrial Species Reported from the Vicinity of the Browns Ferry Nuclear Plant and Associated Transmission Line Corridors."

Page 2-53, Table 2-5, Line 1: The specific epithet for white walnut is *cinerea*.

Page 2-54, Lines 20 and 29: The statements in these two paragraphs about species being listed in various counties are potentially misleading, because they are threatened or endangered throughout their ranges, not just in these counties.

Page 2-54, Lines 24 and 25: The statement that "there is no known nesting habitat within 5 km (3 mi) of the site" is misleading because there is nesting habitat along the shoreline. A more accurate description would be that "although there is nesting habitat along the shoreline in the area around BFN, there are no known nests."

Page 2-55, Lines 1, 2, 13, 14, 23, 37, 38: Similar to the above comment on Page 2-54, Lines 20 and 29, the species discussed are threatened or endangered throughout their ranges, not just in these counties.

Page 2-55, Lines 7 and 8: Delete the portion of the sentence after "drainage canals" which discusses "forested habitats." Gray bats don't normally use forested habitats unless along a stream.

Page 2-55, Line 32: It is not accurate to refer to the Morgan County station for Hart's-tongue fern as being in the southern portion of its range. This fern is highly disjunct,

and while it has been found as far south as Mexico, it occurs nowhere in between the few AL/TN stations and Michigan.

Section 2.2.7 Radiological Impacts

Page 2-57, paragraph at top of page: For aquatic monitoring TVA does not currently sample invertebrates, and terrestrial monitoring includes food crops, soil, and milk if applicable.

Section 2.2.8.2 Public Services

Page 2-61, beginning Line 33: The sentence beginning on this line should be clarified to state that the "approximately 1200 persons" is for the BFN non-outage operating staff, and does not include the Unit 1 recovery workers. For example, the sentence could be changed to read, "BFN, which is the primary traffic generator in the vicinity of the site, currently averages a daily site non-outage population of approximately 3600 persons; of this total, 1300 is for the total Unit 2/3 operating workforce, and 2300 is for Unit 1 recovery." The sentence beginning in Line 35 could also be changed to read, "The operating unit population currently peaks at approximately 2200 during outages, which occur every 24 months (per unit) for approximately 2 months."

Page 2-62, Line 20: Since DOE (eventually) takes responsibility for spent fuel at the nuclear plant site boundary, TVA will not be involved in spent fuel shipments past that point. As a suggestion, the words "TVA plans to" could be changed to "DOE may."

Section 2.2.8.4 Visual Aesthetics and Noise

Page 2-65, Paragraph beginning Line 27: The acreage for Mallard-Fox Creek State Wildlife Management Area (WMA) is 1483 (all land acres). The acreage for Swan Creek State WMA is 8870 (3045 acres land; 5825 acres water). Both WMAs are managed by the Alabama Department of Conservation and Natural Resources, Division of Wildlife & Freshwater Fisheries, and both WMAs are used for waterfowl and small game hunting. (information corrected from BFN License Renewal Environmental Report)

Page 2-66, Line 29: The referenced statement from TVA's SEIS for BFN License Renewal (TVA 2002a) states that "There are no Federal, State of Alabama, or local municipal noise standards, regulations or ordinances that apply to the action alternatives evaluated in this SEIS." Suggest re-wording the sentence beginning Line 29 to "Currently, there are no Federal, State, or local municipal noise standards or regulations that apply to BFN license renewal alternatives" or the equivalent.

Page 2-66, paragraph beginning Line 29: The sound level values used in this paragraph do not include the planned sixth cooling tower. A suggested improvement is to use the

6-tower calculated results from Section 4.3.19 of TVA's FSEIS for BFN License Renewal as bounding values.

Section 2.2.8.5 Demography

Page 2-67, Line 5: Delete the reference to 10-mile ring increments; TVA estimated the population only for 20 and 50-mile rings.

Page 2-67, sentence beginning Line 13: In contrast to this statement, the ER on Page E-34 states that the AL growth rate is projected to exceed that of Lauderdale and Morgan Counties from 2000 to 2015.

Page 2-67, Line 37: The 24.5 percent value for Limestone County population growth between 1990 and 2001 is not recognized. It might have been based on an earlier population estimate. The correct change is 23.6 percent based on the most recently released (2004) U.S. Census Bureau county population estimates.

Page 2-68, Line 1: The 2 percent growth per year value referenced from the BFN License Renewal Environmental Report (TVA 2003a) cannot be confirmed. The correct annual growth rate is 1.5 percent, not 2.

Section 4.1.1 Water Use Conflicts

Page 4-14, Lines 6 and 7: This section is focused on make-up water, but the volume of water "consumed" by BFN (82 cfs, as stated on Page 4-13, Line 34) is much too small to ever threaten other uses of the large volume of water in Wheeler Reservoir (as stated on Page 4-13, Lines 39 – 41). Consequently, TVA would never de-rate the plant to mitigate water-use conflicts. The concluding sentence of this Section should be changed to state, "The staff determined that water-use conflicts would be SMALL and further mitigation measures are not warranted."

Section 4.1.5 Microbiological Organisms

Page 4-25, Lines 5 – 8: What is stated is correct, but it begs for an explanation of why the diffuser discharge temperature could be 0.3°F warmer for two unit operation than for three unit operation (both at EPU), even though three units obviously generate 50 percent more heat than two units. Although this is true, the maximum temperatures in the analyses correspond to open mode conditions creating a temperature of 90°F at the downstream end of the mixing zone (i.e., the NPDES limit). Since the plant releases less heat with two units than it does with three units, it can operate at higher ambient river temperatures (and thus a higher diffuser discharge temperature) with two units and still stay within the downstream mixing zone limit of 90°F.

Section 4.2 Transmission Lines

Page 4-26, Sentence beginning Line 15: Change "will be required if the proposed action" to "will be required whether or not the proposed action."

Page 4-26, Paragraph beginning Line 36: The restriction class definitions vary depending on the type of maintenance and resource area being considered and do not necessarily agree with the simplified statements made here (see table of Class Definitions, pages E-562 and E-563 of Attachment E-6, Transmission Line Corridor Environmental Analysis, of the BFN License Renewal Environmental Report).

Page 4-27, Line 2: The statement that "There is no broadcast application of herbicides." is incorrect. TVA does use and expects to continue using broadcast and/or aerial herbicides in sections of transmission line corridors where appropriate.

Section 4.4.2 Public Services: Public Utilities

Page 4-37, Sentence beginning Line 10: This sentence appears to contradict itself regarding the existence or absence of refurbishment activities. Also, the permanent plant staffing will increase for Unit 1 operations.

Page 4-37, Sentence beginning Line 14: The assumed numbers are not understood. Permanent plant staffing will increase by approximately 150 for Unit 1 operations.

Section 4.4.4 Public Services: Transportation

Page 4-39, Line 21: The license renewal staff is in Chattanooga and is temporary; currently only one license renewal person is at the site.

Page 4-39, Line 25: The number 1810 assumes 210 more vehicles on each road. If the traffic divides equally as stated, there would be 70 more vehicles on each road.

Section 4.4.5 Historic and Archaeological Resources

Page 4-40, Sentence beginning in Line 10: License Renewal by itself changes nothing with regard to historic properties.

Section 4.6.1 Aquatic Species

Page 4-49, Line 16: To be more accurate, this sentence should be corrected as follows: "...candidate species) that occur or historically have occurred in either Wheeler Reservoir..."

Page 4-49, Line 30: To use correct terminology, replace the phrase "Each sensitive area review project" with "Each proposed transmission line vegetation management project..."

Section 4.6.2 Terrestrial Species

Page 4-50, Paragraph beginning Line 17: The following information updates that previously provided by TVA for Natural Areas crossed by transmission corridors or within 0.5 mile of the corridors. For clarity, it is recommended that the text specify the five transmission line corridors that were reviewed and note the ones with no Natural Areas. Note in particular that for Lines 23 and 24, the Duck River State Wildlife Management Area, the Duck River Unit 1 Proposed Designated Critical Habitat, and Elk River and Richland Creek are not appropriate to the scope of this document because these sites are not on the line segments shown on page 2-16 (i.e., only the first 23 miles of the 87-mile-long Browns Ferry to Maury line are included as applicable, and the sites are all on the last segments of the line). This exclusion also applies to the Duck River State Scenic River.

Browns Ferry-Maury 500-kV (L6060), Alabama
- Philadelphia Glade (within 0.5 mile)
- Swan Creek State Wildlife Management Area (within 0.5 mile)

Browns Ferry – Trinity 500-kV (L6078), Alabama
- This TL corridor does not cross any Natural Areas.
- Mallard-Fox Creek State Wildlife Management Area (within 0.5 mile)

Browns Ferry – Trinity 161-kV (L5054), Alabama
- This TL corridor does not cross any Natural Areas.
- Mallard-Fox Creek State Wildlife Management Area (within 0.5 mile)

Browns Ferry – Athens 161-kV (L5055), Alabama
- This TL corridor does not cross any Natural Areas.

Browns Ferry – Union 500-kV (L6091), Mississippi
- Natchez Trace National Parkway
- Canal Section Wildlife Management Area
- TN-TOM Lock D Pool Reservoir Reservation
- East Fork Tombigbee Macro Site
- John Bell Williams State Wildlife Management Area
- TN-TOM Lock E Pool Reservoir Reservation
- TN-TOM Waterway
- Foxtrap Creek Ravine Potential National Natural Landmark
- Bear Creek Unit 2 Proposed Designated Critical Habitat
- Lake Lamar Bruce State Fishing Lake (within 0.5 mile)

Page 4-50, Sentence beginning Line 30: Clarification is needed. TVA does not work with its Right-of-Way (ROW) maintenance contractors to develop restrictions for the ROW contractors to follow; instead, TVA develops and establishes guidelines for the ROW contractors to follow.

Section 4.7 Evaluation of Potential New and Significant Information

Page 4-53, Line 9: As written, this sentence may be misleading. With the new condensers and other changes the total intake flow when Unit 1 is restarted will be higher than for previous three-unit operation.

Page 4-53, Lines 22 – 24: The cited reference (Hopping 2004) discussed discharge temperatures but not specifically thermal stratification. However, it can be concluded from the information given that thermal stratification will also increase. Actually, reservoir stratification locally will be disrupted by mixing from the diffusers. As the flow moves downstream, stratification will be reestablished as the heat accumulates at the surface. Due to the larger amount of heat, the stratification will be larger than that before EPU. Any excess heat will escape to the atmosphere, and the stratification will slowly approach natural conditions as the flow continues further downstream. Far-field modeling reported in the Environmental Report for the BFN License Renewal Application indicates that surface temperatures in the forebay of Wheeler Dam will be, on the average, about 0.3°F warmer for three units at EPU (compared with three units at the originally licensed thermal power). On average, the flow reaches Wheeler Dam before natural conditions are fully reestablished.

Section 4.8.1 Cumulative Impacts Resulting from Operation of the Plant Cooling System

Page 4-66, Line 12: The word "municipal" on this line appears to be an error; the intended word may be "industrial."

Page 4-67, Bottom Paragraph beginning Line 30: This paragraph discusses the TVA Reservoir Operations Study (ROS). On Line 37 it is stated that "...for all alternatives the existing minimum flow past the plant could be maintained." The cited reference is a TVA fact sheet entitled "Wheeler Reservoir Operations under the ROS Preferred Alternative." Although it is true that existing minimum flow past the plant could be maintained, this was not explicitly stated in the cited reference; rather, it states that "...flow requirements also would be used to protect water quality and aquatic resources." Elsewhere in the ROS FEIS (Chapter 3), data are provided showing that target minimum flows will be maintained. As noted in the comments for Section 2.2.2 Water Use, the target minimum flows for BFN were slightly changed by the ROS, and in some months are now slightly higher compared to the pre-ROS values.

Page 4-68, Lines 32 – 33: As noted in the comments for Section 2.2.2 Water Use, the statement about what is a "significant fraction" lacks a definition, and should be accompanied by a statement regarding the frequency of occurrence.

Section 4.8.5 Cumulative Impacts on Groundwater Use and Quality

Page 4-71, Line 32: All BFN potable water comes from Athens Water Services, which has the Elk River (not the Tennessee River) as its principal source.

Section 8-1 No-Action Alternative

Page 8-2, Paragraph beginning Line 7: Suggest re-ordering these options, from the most likely to the least likely, which would be (3), (2), (1), or (4). Spelled out, this would be as follows: "Under the no-action alternative, replacement of BFN electricity generation capacity would be met by (1) TVA generating alternatives other than BFN, (2) power purchased from other electricity providers, (3) demand-side management (DSM), or (4) some combination of these options.

Section 8.1.7 Socioeconomics

Page 8-5, Line 22: The total TVA payment to Limestone County was $4,544,825 in FY 2002 and $4,566,727 in FY 2003. Not all of this, however, is attributable to BFN. The BFN portion of this payment was $2,008,723 in FY 2002 and $2,015,210 in FY 2003. Total county revenues are variable, causing the share to vary considerably from year to year. However, in FY 2002, the BFN portion of TVA's payment was 6.5 percent of the total county revenues of $30,758,933; in FY 2003, they were 10.03 percent of county revenues of $20,082,621. The 5.88 percent value quoted at the bottom of page E-209 of the Environmental Report is not correct.

Page 8-5, Paragraph beginning Line 36: Per the above comment, the property tax revenue equivalent from BFN is approximately 10 percent or less of total Limestone County revenues.

Section 8.1.10 Environmental Justice

Page 8-6, bottom paragraph: These potential negative and disproportionate impacts could apply to secondary job losses such as retail, services, etc., but not to direct BFN job losses.

Section 8.2.1.1 Closed-Cycle Cooling System

Page 8-17, Line 31: TVA projects that the total number of workers would exceed 500 for approximately 2 ½ years (see TVA's Environmental Report for BFN License Renewal, Page E-289, paragraph under Socioeconomics).

Section 8.2.3 Natural Gas Combined-Cycle Generation

Page 8-32, Table 8-6, Impact Category for Air Quality: The stated quantities of air emissions are the values reported in Section E.7.2.2.1 of TVA's Environmental Report for BFN License Renewal, but they are based on seven NGCC plants. In Section 8.2.3 on Page 8-31 of NRC's SEIS, the statement is made that eight NGCC plants would be needed.

Page 8-36, Sentence beginning on Line 2: This sentence appears to contradict itself; it may have too many negatives.

Page 8-36, Sentence beginning on Line 32: This sentence is not clear; words may have been omitted, or it might contain grammatical errors.

Section 8.2.4.1 Closed-Cycle Cooling System

Page 8-40, Table 8-8, Impact Category of Land Use: The "Impact" is listed as MEDIUM to LARGE and the "Comment" statement is made that "Additional land-use impacts would occur for uranium mining." Currently, BFN has fuel contracts to use blended-down surplus highly-enriched uranium; these do not involve any uranium mining, and it is likely that an ABWR at Bellefonte could use the same fuel, especially if BFN was discontinued.

Section 8.2.6.10 Delayed Retirement

The paragraph on Delayed Retirement is not consistent with the following statements made by TVA in a May 27, 2004 letter to NRC transmitting "Addition Information for License Renewal Environmental Review" from Mark Burzynski, Manager of Nuclear Licensing: "TVA has no schedule for retiring current generating units. TVA is adding environmental controls and maintaining the existing units as necessary to keep them running. TVA has no retired fossil units that would be considered for restarting." Please delete all references to TVA fossil plants being slated for retirement.

Section 8.2.6.11 Utility-Sponsored Conservation

Page 8-53, Line 29: Suggest spelling out DSM (Demand-Side Management).

Section 8.2.7 Combination of Alternatives

Page 8-54, Table 8-10, Impact Category on Air Quality: The air emissions values listed are approximately 80 percent of the values listed in Table 8-6, which were the values stated by TVA for seven 510 MW units.

Appendix E, BFN Units 1, 2, and 3 Compliance Status and Consultation Correspondence

Page E-25, Line 36: As noted earlier, the use of the word "committed" could invite confusion with regulatory commitments. A more accurate characterization would be as follows:

"As reflected in the Record of Decision for the TVA Final Environmental Impact Statement for BFN License Renewal (Federal Register Vol. 67, No. 117, pp. 41565 – 41569, June 18, 2002), TVA's decision was to adopt the agency-preferred alternative to refurbish and restart BFN Unit 1, to proceed with NRC license extensions for all three units at BFN, and to construct a single 20-cell linear mechanical draft cooling tower in the currently vacant position (tower 4) where a tower that was destroyed by an accidental fire in 1986 was never replaced. Regardless of the schedule for power uprates on any unit, the 6th tower is scheduled for completion prior to the first summer following Unit 1 restart."

Page E-29, Paragraph beginning Line 23: The restriction class definitions vary depending on the type of maintenance and resource area being considered and do not necessarily agree with the simplified statements made here (see table of Class Definitions, pages E-562 and E-563 of Attachment E-6, Transmission Line Corridor Environmental Analysis, of the BFN License Renewal Environmental Report).

Page E-29, Line 30: The statement that "There is no broadcast application of herbicides." is not correct. TVA does use and expects to continue using broadcast and/or aerial herbicides in sections of transmission line corridors where appropriate.

Appendix F, GEIS Environmental Issues Not Applicable to BFN Units 1, 2, 3

Page F-2, Table F-1, first item: The statement that BFN uses <100 gpm of groundwater is potentially misleading because BFN does not use any groundwater.