



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379-2000

April 12, 2005

State of Tennessee
Department of Environment and Conservation
Division of Water Pollution Control
Enforcement & Compliance Section
6th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1534

Attention: Mr. Chip Hannah

Dear Mr. Hannah:

SEQUOYAH NUCLEAR PLANT – CORRECTIONS TO DISCHARGE MONITORING REPORTS (NPDES Permit TN0026450 Part II.C.2.b)

Problem Evaluation Report (PER) 68880 was written to document the discovery of clams in Electric Board Room Chiller A. During the course of the PER investigation, the Essential Raw Cooling Water (ERCW) flow to the Emergency Diesel Generator (EDG) Heat Exchangers was not being considered in the total ERCW system flow and therefore was not being considered in the ERCW National Pollutant Discharge Elimination System (NPDES) total residual chlorine (TRC) calculation. Sequoyah (SQN) has reviewed historical oxidizing and non-oxidizing biocide treatment data to ensure that the unrecognized ERCW flow increase did not adversely impact the NPDES permit reporting data that is reported monthly in the Discharge Monitoring Report (DMR). SQN reviewed and recalculated Diffuser Pond (Outfall 101) TRC values for when the EDG Heat Exchangers were receiving flow from the ERCW during chlorination for the last three years. Based on this review, SQN found two incidences where the corrected TRC value was greater than the TRC value reported to TDEC in the monthly DMR. The monthly average TRC values were not affected. To correct this problem and prevent recurrence, SQN procedures were revised to include the ECRW flow to the EDG. No NPDES TRC limits were exceeded.

Date of DMR	Submitted Daily Instantaneous Maximum Calculated TRC Value	Revised Daily Instantaneous Maximum Calculated TRC Value	Outfall 101 NPDES Permit Limit for Daily Instantaneous Maximum Calculated TRC
May 2002	0.021	0.022	0.058
January 2003	0.016	0.017	0.058

PER 76826 was written to address that a NPDES Permit requirement (NPDES Permit TN0026450 Part I.D.2) to report all analysis performed by approved NPDES methods on

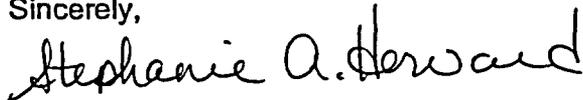
IE25

NPDES discharge points has not been performed. Post chlorination TRC analysis at Outfall 101 (to ensure chlorination has ceased) has not been reported. Although sample results have been documented in the SQN Computer Automated Lab System (CALs), the data results were not transferred to the environmental procedure used to prepare the monthly DMR. Therefore, the post chlorination results were not reported in the monthly DMR to TDEC. Review of the sample data for the past three years revealed that reporting the post chlorination data would only lower the monthly average TRC value reported on the DMR and would not affect the daily instantaneous maximum TRC value. To correct this problem and prevent recurrence, SQN procedures were revised to remove the requirements for the post chlorination samples, and the instructions were clarified on logging of NPDES data. No NPDES TRC limits were exceeded.

Please contact me at (423) 843-6700 if you have any questions or comments.

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 there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Stephanie A. Howard
Principal Environmental Engineer
Signatory Authority for
J. Randy Douet
Site Vice President
Sequoyah Nuclear Plant

Enclosure

cc (Enclosure):

Chattanooga Environmental Assistance Center
Division of Water Pollution Control
State Office Building, Suite 550
540 McCallie Avenue
Chattanooga, Tennessee 37402-2013

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

Name TVA - SEQUOYAH NUCLEAR PLANT
Address P.O. BOX 2000
(INTEROFFICE SB-2A)
SODDY - DAISY TN 37384
Facility TVA - SEQUOYAH NUCLEAR PLANT
Location HAMILTON COUNTY

TN0026450 **101 G**
PERMIT NUMBER DISCHARGE NUMBER

MONITORING PERIOD

From

YEAR	MO	DAY
02	05	01

 To

YEAR	MO	DAY
02	05	31

F - FINAL
DIFFUSER DISCHARGE
EFFLUENT

*** NO DISCHARGE ***

NOTE: Read instructions before completing this form.

ATTN: Stephanie A. Howard

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
TEMPERATURE, WATER DEG. CENTIGRADE 00010 Z 0 0 INSTREAM MONITORING	SAMPLE MEASUREMENT	*****	*****	**	*****	*****	24.7	04	0	31 / 31	MODEL D
	PERMIT REQUIREMENT	*****	*****	***	*****	*****	30.5 DAILY MX	DEG. C.		SEE PERMIT	CK REQ.
TEMPERATURE, WATER DEG. CENTIGRADE 00010 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	*****	35.9	04	0	31 / 31	RCORDR
	PERMIT REQUIREMENT	*****	*****	***	*****	*****	REPORT DAILY MX	DEG. C.		SEE PERMIT	CK REQ.
PH 00400 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	7.3	*****	7.6	12	0	10 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	***	6.0 MINIMUM	*****	9.0 MAXIMUM	SU		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED 00530 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	6	7	19	0	5 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	***	*****	30 MO AVG	100 DAILY MX	MG/L		WEEKLY	GRAB
OIL AND GREASE 00556 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	<5	<5	19	0	5 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	***	*****	15 MO AVG	20 DAILY MX	MG/L		WEEKLY	GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT 50050 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	1741	03	*****	*****	*****	**	0	31 / 31	RCORDR
	PERMIT REQUIREMENT	*****	REPORT DAILY MX	MGD	*****	*****	*****	***		CONTIN UOUS	RCORDR
CHLORINE, TOTAL RESIDUAL 50060 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	<0.009	0.022	19	0	43 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	***	*****	0.036	0.058 INST MAX	MG/L		WEEK DAYS	CALCTD

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER J. Randy Douet Site Vice President TYPED OR PRINTED	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.	<i>Stephanie A. Howard</i> Principal Environmental Engineer SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE		DATE		
			423	843-6700	05	04	11
			AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

No closed mode operation. The following injections occurred: 1. PCL-222 (max. calc. conc. was 0.062 mg/L--limit 0.100mg/L) 2. CL-363 (max. calc. conc. was 0.015 mg/L--limit 0.100mg/L) 3. PCL-222/PCL-401 (max. calc. conc. was 0.021mg/L--limit 0.100mg/L)

Name TVA - SEQUOYAH NUCLEAR PLANT
Address P.O. BOX 2000
(INTEROFFICE SB-2A)
SODDY - DAISY TN 37384
Facility TVA - SEQUOYAH NUCLEAR PLANT
Location HAMILTON COUNTY

TN0026450 101 G
PERMIT NUMBER DISCHARGE NUMBER

F - FINAL
DIFFUSER DISCHARGE
EFFLUENT

MONITORING PERIOD
From YEAR 03 MO 01 DAY 01 To YEAR 03 MO 01 DAY 31

*** NO DISCHARGE ***

NOTE: Read instructions before completing this form.

ATTN: Stephanie A. Howard

PARAMETER	SAMPLE MEASUREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS			
TEMPERATURE, WATER DEG. CENTIGRADE 00010 Z 0 0 INSTREAM MONITORING	SAMPLE MEASUREMENT	*****	*****	**	*****	*****	9.2	04	0	31 / 31	MODEL
	PERMIT REQUIREMENT	*****	*****	****	*****	*****	30.5 DAILY MX	DEG. C.		SEE PERMIT	CK REQ
TEMPERATURE, WATER DEG. CENTIGRADE 00010 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	*****	23.2	04	0	31 / 31	RCORDR
	PERMIT REQUIREMENT	*****	*****	****	*****	*****	REPORT DAILY MX	DEG. C.		SEE PERMIT	CK REQ
PH 00400 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	7.6	*****	8.0	12	0	10 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	****	6.0 MINIMUM	*****	9.0 MAXIMUM	SU		WEEKLY	GRAB
SOLIDS, TOTAL SUSPENDED 00530 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	4	5	19	0	5 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	30 MO AVG	100 DAILY MX	MG/L		WEEKLY	GRAB
OIL AND GREASE 00556 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	<5	<5	19	0	5 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	15 MO AVG	20 DAILY MX	MG/L		WEEKLY	GRAB
FLOW, IN CONDUIT OR THRU TREATMENT PLANT 50050 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	1614	03	*****	*****	*****	**	0	31 / 31	RCORDR
	PERMIT REQUIREMENT	*****	REPORT DAILY MX	MGD	*****	*****	*****	****		CONTINUOUS	RCORDR
CHLORINE, TOTAL RESIDUAL 50060 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****	**	*****	<0.005	0.017	19	0	38 / 31	GRAB
	PERMIT REQUIREMENT	*****	*****	****	*****	0.036	0.058 INST MAX	MG/L		WEEK-DAYS	CALCTD

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	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.	TELEPHONE		DATE			
J. Randy Douet Site Vice President		Stephanie A. Howard Principal Environmental Engineer	423	843-6700	05	04	11
TYPED OR PRINTED			SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

No closed mode operation. The following injections occurred: 1. PCL-222 (max. calc. conc. was 0.026mg/L--limit 0.100mg/L) 2. CL-363 (max. calc. conc. was 0.009mg/L--limit 0.100mg/L) 3. PCL-222/PCL-401 (max. calc. conc. was 0.020mg/L--limit 0.100mg/L)