



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

446 Neal Street  
Cookeville, TN 38501

May 22, 1995

Mr. Dennis M. Crutchfield  
Associate Director  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Re: FWS #95-1618

Dear Mr. Crutchfield:

Thank you for your letter and enclosure of May 9, 1995, transmitting a copy of the draft Environmental Protection Plan (EPP) for the operation of the Watts Bar Nuclear Plant (WBN) in Rhea County, Tennessee. The Fish and Wildlife Service (Service) has reviewed the document and offers the following comments.

The draft EPP states that environmental concerns which relate to water quality are regulated by the National Pollution Discharge Elimination System (NPDES) permit issued to WBN by the State of Tennessee. Review of the permit, however, appears to indicate that two parameters that could potentially have significant adverse effects on aquatic species are not adequately addressed.

There are no temperature limits contained in the permit. The permit requires the permittee to conduct temperature modeling studies to determine the appropriate daily average discharge temperature from plant outfalls which would provide compliance with state water quality criteria for instream temperature. The NPDES permit was issued on September 30, 1993; the permittee was given until December 31, 1993, to provide the results of the temperature modeling. We assume that the modeling studies were conducted, the results submitted to the State Division of Water Pollution Control, and a supplement to the NPDES permit, containing temperature limits, issued.

Liquid radiological waste was identified as one component of the discharge at WBN from Outfall 1 and Outfall 2. The NPDES permit, however, does not contain any monitoring limits for this material.

Potential impacts to endangered aquatic species from changes in water temperature and discharge of radiological and other types of waste from WBN were two of the primary concerns of the Service during our consultations with the Nuclear Regulatory Commission (NRC) and Tennessee Valley Authority (TVA).

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Please provide evidence to ensure us that there are limits on levels of these parameters and that the licensee has provisions in place for monitoring to ensure that temperature and levels of liquid radiological waste in discharges do not reach levels that would have adverse effects on aquatic species.

With regard to the reporting requirements contained in the draft EPP, the Service wants to ensure that appropriate personnel from each agency are notified in the event of an exceedance or spill. The draft EPP, however, states only that the NRC and the Service (Cookeville Office) will be notified. In addition to our respective agencies, we recommended, and NRC concurred, that appropriate TVA personnel would also be notified. Since the plant is likely to be operating long after the personnel involved in the licensing procedure have left their respective agencies, we request that the final EPP contain reporting requirements that identify more specifically who will be notified if an exceedance or accidental spill occurs at WBN. We recommend that the Director (or Assistant Director) of the Office of Nuclear Reactor Regulation (NRC), the Senior Malacologist (or the Director) of the Environmental Quality Section (TVA), and the Field Supervisor of the Cookeville Office (FWS) be identified as the individuals to be notified.

Thank you for the opportunity to comment on the draft EPP. If you have questions, please contact me or Jim Widlak of my staff at 615/528-6481.

Sincerely,



Douglas B. Winford  
Acting Field Supervisor

xc: TVA, Knoxville, TN (Attention: John Jenkinson)  
TDEC, Nashville, TN (Attention: Dan Eagar)