

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

470 401 Building

K. Blum

V. 11.

October 23, 1978

Mr. Richard DeYoung, Director
Division of Site Safety and
Environmental Analysis
U.S. Nuclear Regulatory Commission
Washington, DC 20555

REGULATORY DOCKET FILE COPY

Dear Mr. DeYoung:

In the Matter of the Application of) Docket Nos. 50-390
Tennessee Valley Authority) 50-391

Enclosed for your information is a copy of a letter from TVA to the Tennessee Department of Public Health containing TVA's comments on the draft state certification for the Watts Bar Nuclear Plant.

Yours very truly,

TENNESSEE VALLEY AUTHORITY

L. M. Mills
L. M. Mills, Chief
Regulatory Staff

Enclosure

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Mr. Stephen E. Anderson
Assistant Director for Enforcement
and Planning
Division of Water Quality Control
Tennessee Department of Public Health
621 Cordell Hull Building
Nashville, Tennessee 37219

Dear Mr. Anderson:

We have reviewed the "Notice of Intended Action - State Certification of NPDES Permit No. TN0020168, Watts Bar Nuclear Plant" and request the following modifications of the certification.

Proposed Condition 4a

Revise the last sentence of this condition to read as follows, "On each occurrence a grab sample shall be collected for suspended solids analysis, and the results of such analysis shall be reported either with the notification of overflow or within 15 days of the occurrence." The purpose of this request is to provide for a later submission of the information in the event that the laboratory analysis are not available within the five-day notification period.

Proposed Condition 4c

We believe that the proposed weekly average discharge limitations for five-day BOD and total suspended solids are difficult to enforce. We feel that the daily average and daily maximum limitations contained in the draft permit are thus more appropriate. In addition, we do not feel that the proposed viable coliform limitation is compatible with the sampling frequency and request that it be deleted. It is our understanding, from discussions with your staff, that the coliform sampling program discussed in the certification is one utilized for evaluation of treatment plant effectiveness and, as such, we have no objection to its use. We do feel that it is inappropriate for inclusion as a permit requirement.

These requests do not constitute an appeal of your intended certification but are made to clarify or improve the effectiveness of the permit and certification.

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Mr. Stephen E. Anderson

If you have any questions concerning these requests, please contact me (telephone 755-3161 in Chattanooga) or James S. Morris of my staff (telephone 755-3147 in Chattanooga).

Sincerely yours,

Harry G. Moore, Jr., Ph.D.
Acting Director of Environmental
Planning

cc: Mr. John C. White
Administrator, Region IV
Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30308

Mr. Jack McCormick, Regional Engineer
Tennessee Department of Public Health
Water Quality Control
2501 Milne Street
Chattanooga, Tennessee 37406

Mr. Charles Kaplan, Coordinator
Thermal Analysis Unit
Enforcement Division
Environmental Protection Agency
345 Courtland Street, NE.
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