

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401
400 Chestnut Street Tower II

March 21, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. E. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

In the Matter of the Application of)
Tennessee Valley Authority

Docket Nos. 50-390
50-391

Enclosed are TVA's comments and corresponding justifications for the Watts Bar Nuclear Plant Unit 1 Draft Appendix B Technical Specifications.

If you have any questions concerning this matter, please get in touch with K. Mali at FTS 858-2682.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

J. A. Domer
J. A. Domer
Nuclear Engineer

Sworn to and subscribed before me
this 21st day of Mar., 1985.

Paulette H. White
Notary Public

My Commission Expires 8-24-88

Enclosure

cc: U.S. Nuclear Regulatory Commission (Enclosure)
Region II
Attn: Dr. J. Nelson Grace, Regional Administrator
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

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ENCLOSURE

WATTS BAR NUCLEAR PLANT UNIT 1
DRAFT APPENDIX B TECHNICAL SPECIFICATIONS
(ENVIRONMENTAL PROTECTION PLAN)

1. Page 3-3: The first paragraph on this page should be deleted.

Justification: NRC does not regulate changes to an effective NPDES permit nor does NRC renew an NPDES permit upon expiration. Thus, NRC should not require notification of changes or a copy of a renewal application. The Environmental Protection Agency (EPA) has full authority for modifying or renewing NPDES permits. Thus, the EPA should be responsible for involving NRC with permitting activities.

2. Page 5-2: Add the following paragraph.

"For those programs concerned with water quality or protection of aquatic biota which are regulated under the Clean Water Act, the requirements of this section shall be satisfied by submitting to NRC copies of the reports as required by the NPDES permit (or otherwise required pursuant to the Clean Water Act), and in accordance with the frequency, content, and schedules set forth by the agencies responsible for implementing the Clean Water Act."

Justification: NRC currently receives these reports for other nuclear plants, and this requirement was obviously overlooked in the draft technical specifications for WBN.

3. Page 5-2, subsection 5.4-1: Replace the first paragraph with the following:

"An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted within 90 days following each anniversary of issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license."

Justification: If the operating license is issued on May 1, a report covering the previous year would include events through April 30, making it impossible to have a report ready on May 1. If the operating license is issued after May 1, the reporting requirement submittal of "prior to May 1" makes the reporting period less than one year.