



Tennessee Valley Authority, Post Office Box 2000, Soddy Daisy, Tennessee 37384-2000

April 01, 2010

Chattanooga Environmental Field Office
Division of Water Pollution Control
State Office Building, Suite 550
540 McCallie Avenue
Chattanooga, Tennessee 37402

TENNESSEE VALLEY AUTHORITY - SEQUOYAH NUCLEAR PLANT - TENNESSEE STORM WATER MULTI-SECTOR GENERAL PERMIT FOR INDUSTRIAL ACTIVITIES PERMIT NO. TNR050015 SECTOR O EXCEEDANCE OF THE BENCHMARK MONITORING REQUIREMENT.

Please find enclosed the thirty day notification and the lab analysis for the exceedance of the benchmark monitoring requirement for total recoverable iron for Storm Water Outfall Nos. 1, 2, 15, and 17.

Description of Event

Tennessee Storm Water Multi-Sector General Permit for Industrial Activities Sector O requires annual monitoring of total recoverable iron. Sequoyah Nuclear Plant sampled for total recoverable iron on March 2, 2010 and March 11, 2010. The storm water analytical monitoring results were received on March 8, 2010 and March 19, 2010. The analytical monitoring results for Storm Water Outfalls Nos. 1, 2, 15 and 17 exceeded the benchmark monitoring requirement for total recoverable iron as stated in Table O-2, Benchmark Monitoring Requirements for Steam Electric Power Generating Facilities.

Storm Water Outfall No. 2 was sampled for total recoverable iron on March 2, 2010 and results were received on March 8, 2010. The analytical monitoring result for Storm Water Outfall No. 2 was 6.3mg/L. The backup sample for Storm Water Outfall No. 2 was sent for analysis on March 8, 2010 and results were received on March 10, 2010. The backup analytical monitoring result for Storm Water Outfall No. 2 was 4.3mg/L. Since the backup sample result was below the benchmark of 5.0mg/L, SQN had the original and the backup samples reanalyzed. The original sample was reanalyzed and the iron results were 5.5mg/L and 5.2mg/L. The backup sample was reanalyzed and the iron results were 5.2mg/L and 5.2mg/L. The average of the six analytical monitoring results for Storm Water Outfall No. 2 was 5.3mg/L. (See Table 1)

Storm Water Outfall Nos. 1, 15, and 17 were sampled for total recoverable iron on March 11, 2010 and results were received on March 19, 2010. The analytical monitoring results for Storm Water Outfall Nos. 1, 15, and 17 were 12.0mg/L, 7.4mg/L, and 6.2mg/L respectively. Backup samples for Storm Water Outfall Nos. 1, 15, and 17 were sent for analysis on March 22, 2010 and results were received on March 26, 2010. The backup analytical monitoring results for Storm Water Outfall Nos. 1, 15, and 17 were 11.0mg/L, 7.6mg/L, and 6.9mg/L respectively. The average analytical monitoring results for Storm Water Outfall Nos. 1, 15, and 17 were 11.5mg/L, 7.5mg/L, and 6.6mg/L respectively. (See Table 1)

IE25
NRR

TABLE 1						
Storm Water Outfall No.	Sample Date	Received Date	Original Sample Results (mg/L)	Backup Sample Results (mg/L)	Average Sample Results (mg/L)	Benchmark Monitoring Requirement (mg/L)
1	3/11/2010	3/19/2010	12.0	11.0	11.5	5.0
2	3/02/2010	3/08/2010	6.3, 5.5, 5.2	4.3, 5.2, 5.2	5.3	5.0
15	3/11/2010	3/19/2010	7.4	7.6	7.5	5.0
17	3/11/2010	3/19/2010	6.2	6.9	6.6	5.0

The Tennessee Storm Water Multi-Sector General Permit for Industrial Activities requires informing the division's local Environmental Field Office (EFO) within 30 days from the time storm water monitoring results were received, describing the likely cause of the exceedance(s).

Likely Cause of the Exceedance(s)

The likely cause of the exceedances(s) of the benchmark monitoring requirement for total recoverable iron is elevated background iron concentration in the soil around the storm water outfalls (based on historical sampling) and the need for more effective best management practices (BMPs). Sequoyah is examining the use of more effective filtration methods at these outfalls.

If you have any questions or need additional information, please contact Ann Hurt at (423) 843-6714 or Stephanie Howard at (423) 843-6700 of Sequoyah's Environmental staff.

Sincerely,



Christopher R. Church
 Site Vice President
 Sequoyah Nuclear Plant

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



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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 19, 2010

Date Received : 03/18/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW 1
Collected By : MW/CR
Collection Date : 03/11/10 11:40

ESC Sample # : L449866-01
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	12.	0.10	mg/l	200.7	03/18/10	1103	501 03/18/10	2137 ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

AIHA - 09227, AL - 40660, CA - I-2327, CT - PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, NC - ENV375, DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
AZ - 0612, MN - 047-999-395, NY - 11742, NJ - TN002, WI - 998093910

Notes:

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REPORT OF ANALYSIS

March 26, 2010

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

Date Received : 03/23/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW 1
Collected By : M/W/C
Collection Date : 03/11/10 11:40

ESC Sample # : L450627-01
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	11.	0.10	mg/l	200.7	03/23/10	1603.117	03/25/10 1712	LRL

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Stephanie Howard
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 07, 2010

Date Received : 03/04/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW-2
Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L447701-01
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	6.3	0.10	mg/l	200.7	03/04/10 1504	457	03/05/10 1432	DMM

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 12, 2010

Date Received : 03/03/10 09:00
Description : NPDES WW Samples
Sample ID : SW 2
Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L448890-01
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	5.5	0.10	mg/l	200.7	03/11/10	1536	388 03/12/10	0334 ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 12, 2010

Date Received : 03/03/10 09:00
Description : NPDES WW Samples
Sample ID : SW 2
Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L448890-02

Site ID :

Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	5.2	0.10	mg/l	200.7	03/11/10	1536	388 03/12/10	0337 ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 10, 2010

Date Received : 03/09/10 09:00
Description : TVA-SQN

Sample ID : SW2

Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L448311-01

Site ID :

Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	4.3	0.10	mg/l	200.7	03/09/10 1117	501	03/09/10 1959	ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 12, 2010

Date Received : 03/09/10 09:00
Description : NPDES WW Samples
Sample ID : SW 2
Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L448890-03

Site ID :

Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	5.2	0.10	mg/l	200.7	03/11/10	1536	388 03/12/10	0340 ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

AIHA - 09227, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
KY - 90010, NC - ENV375, DW21704, ND - R-140, SC - 84004, TN - 2006, VA - 00109, WV - 233
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Soddy-Daisy, TN 37384

March 12, 2010

Date Received : 03/09/10 09:00
Description : NPDES WW Samples
Sample ID : SW 2
Collected By : Maggie Williams
Collection Date : 03/02/10 12:53

ESC Sample # : L448890-04
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	5.2	0.10	mg/l	200.7	03/11/10	1536	388 03/12/10	0344 ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 19, 2010

Date Received : 03/18/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW 15
Collected By : MW/CR
Collection Date : 03/11/10 11:22

ESC Sample # : L449866-02
Site ID :
Project # :

Table with 10 columns: Parameter, Result, Det. Limit, Units, Method, Prep, PID, Analyzed, AID. Row 1: Iron, 7.4, 0.10, mg/l, 200.7, 03/18/10 1103, 501, 03/18/10 2134, ALT

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 26, 2010

Date Received : 03/23/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW 15
Collected By : M/W/C
Collection Date : 03/11/10 11:22

ESC Sample # : L450627-02
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	7.6	0.10	mg/l	200.7	03/23/10	1603	117 03/25/10	1715 LRL

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit(PQL)

Laboratory Certification Numbers:

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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
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Soddy-Daisy, TN 37384

March 19, 2010

Date Received : 03/18/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW17
Collected By : MW/CR
Collection Date : 03/11/10 11:08

ESC Sample # : L449866-03
Site ID :
Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	6.2	0.10	mg/l	200.7	03/18/10 1103	501	03/18/10 2131	ALT

BDL - Below Detection Limit
Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:
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REPORT OF ANALYSIS

Ms. Ann Hurt
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 26, 2010

Date Received : 03/23/10 09:00
Description : Annual Storm Water NPDES WW Samples
Sample ID : SW 17
Collected By : M/W/C
Collection Date : 03/11/10 11:08

ESC Sample # : L450627-03

Site ID :

Project # :

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	6.9	0.10	mg/l	200.7	03/23/10	1603	117 03/25/10	1718 LRL

BDL - Below Detection Limit

Det. Limit - Practical Quantitation Limit (PQL)

Laboratory Certification Numbers:

AIHA - 09227, AL - 40660, CA - I-2327, CT- PH-0197, FL - E87487, GA - 923, IN - C-TN-01
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