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

March 20, 2013

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, the lab analysis for the exceedance of the benchmark monitoring requirement for total recoverable iron for Storm Water Outfall Number 3, the sixty day notification of the review of Sequoyah Nuclear Plant's Storm Water Pollution Prevention Plan (SWPPP), and a summary of Best Management Practices (BMPs) modifications and additions to mitigate future exceedance of total recoverable iron.

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 January 11, 2013. The storm water analytical monitoring results were received on February 25, 2013. The analytical monitoring results for Storm Water Outfall Number 3 exceeded the benchmark monitoring requirement for total recoverable iron as stated in Table O-2, Benchmark Monitoring Requirements for Steam Electric Power Generating Facilities. The qualifying event resulted from a four hour rainfall on the morning of January 11, 2013. The analytical results can be seen tabulated below.

Table 1. Storm Water Annual Iron Exceedance Values

Storm Water Outfall Number	Sample Date	Sample Analysis Received Date	Backup Sample Analysis Received	Analytical Results (mg/L)	Averaged Results (mg/L)	Benchmark Monitoring Requirement (mg/L)
3	1/11/2013	2/25/2013	03/05/2013	8.4; 6.7	8	5

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.

C 001
MRL

Likely Cause of the Exceedance

The likely cause of the exceedance of the benchmark monitoring requirement for total recoverable iron is elevated iron concentration in the native soil around the storm water outfall and the presence of exposed steel which had been temporarily staged in the area.

SWPPP Review and Modification Timeline

Sequoyah Nuclear Plant's SWPPP has been reviewed to determine the modifications and additions to the plan which would assist in reducing the iron effluent concentration at Storm Water Outfall Number 3. A brief summary of the proposed modifications, including a timetable for implementation follows.

Storm Water Number 3
Per the SQN SWPPP, ground cover consists of crushed stone, gravel, and grass. Drainage ditches are equipped with rip rap and filter socks as best management practices.

The exposed steel and temporary material storage near storm water oufall number 3 will be removed by 3/30/2013.

If you have any questions or need additional information please contact Brad Love of Sequoyah's Environmental staff by phone at (423) 843-6714 or by e-mail bmlove@tva.gov.

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.

Sincerely,

John T. Carlin
Site Vice President
Sequoyah Nuclear Plant

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

ESC
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Est. 1970

REPORT OF ANALYSIS

Brad Love
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

February 25,2013

ESC Sample # : L621136-03

Date Received : 02/20/13 09:00
Description : Annual Storm Water NPDES Samples

Site ID :

Sample ID : SW 3

Project # :

Collected By : ZH/PB
Collection Date : 01/11/13 09:30

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	8.4	0.10	mg/l	200.7	02/21/13 1731	388	02/22/13 2301	ST

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:
The reported analytical results relate only to the sample submitted
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REPORT OF ANALYSIS

Brad Love
TVA-Sequoyah Nuclear Plant
P.O.Box 2000
Soddy-Daisy, TN 37384

March 05,2013

ESC Sample # : L622673-01

Date Received : 03/01/13 09:00
Description : Annual Storm Water NPDES Samples

Site ID :

Sample ID : SW 3 BACK UP

Project # :

Collected By : ZH/PB
Collection Date : 01/11/13 09:30

Parameter	Result	Det. Limit	Units	Method	Prep	PID	Analyzed	AID
Iron	6.7	0.10	mg/l	200.7	03/04/13 1850	580	03/05/13 1230	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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