

November 21, 2014

Ms. Diane Curran  
c/o Southern Alliance for Clean Energy  
1726 M St., NW. Suite 600  
Washington DC 20036-4523

Dear Ms. Curran:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated June 23, 2014. In your letter, you question the adequacy of the NRC's review of the Tennessee Valley Authority's (TVA's) Watts Bar Nuclear Plant, Unit 2 operating license application. Specifically, you question the following:

1. NRC's review of seismic and flooding requirements in the Watts Bar Unit 2 operating license application.
2. NRC's implementation of the Japan Lessons-Learned Near-Term Task Force (NTTF) recommendation to reevaluate seismic and flooding hazards in the Watts Bar Unit 2 operating license review.
3. NRC's practices for allowing opportunity for public participation during the Watts Bar Unit 2 licensing process.

In your letter you express concern that the NRC's operating license review of Watts Bar Unit 2 will not adequately address flooding and seismic safety requirements. All power reactors must be designed to safely withstand a set of natural events, including earthquakes, hurricanes, tornadoes, floods, and tsunamis. These are called design-basis events. The NRC is currently completing the review of the Watts Bar Unit 2 operating license application, which includes the review of the site-specific hydrological licensing basis. To maintain site-wide consistency, the NRC is considering the current design-basis hazards of record for Watts Bar Unit 1 in the Watts Bar Unit 2 review. The NRC will not issue an operating license for Watts Bar Unit 2 until there is a reasonable assurance that the licensee can operate the facility safely and meet all applicable requirements.

In your letter, you also express concern that in its review of the Watts Bar Unit 2 operating license application, the NRC is not applying seismic and flooding recommendations from the July 12, 2011, Japan Lessons-Learned Near-Term Task Force report, "Recommendation for Enhancing Reactor Safety in the 21st Century: The Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident." To fully address your concern, it is necessary to first describe how the NRC is implementing post-Fukushima regulatory activities. The NRC formed the Japan Lessons-Learned Near-Term Task Force shortly after the Fukushima Dai-ichi accident. The goal of the task force was to determine what lessons the NRC can learn from the accident and to identify recommendations to enhance reactor safety in the United States. The staff prioritized the task force's recommendations in a three-tiered approach and also described the appropriate regulatory mechanisms for implementation (for example, orders, rulemaking, and requests for information). The Commission approved the staff's proposed actions, schedule for completion, and prioritization approach for implementing the Near-Term Task Force recommendations. Staff requirements memoranda (SRMs) for SECY-11-0124 and SECY-11-0137 describe this approach. You can find these memoranda in the Agencywide

Documents Access and Management System (ADAMS) under Accession Nos. ML112911571 and ML113490055, respectively. Overall, the NRC determined that it is prudent for the agency to take additional regulatory action in response to the accident. However, the NRC also concluded that continued plant operation and licensing activities, including the review of the Watts Bar Unit 2 operating license application, can continue because these actions do not pose an imminent risk to public health and safety. You can find more information on how the NRC is implementing lessons learned from the Fukushima Dai-ichi accident at the NRC public Web site at <http://www.nrc.gov/reactors/operating/ops-experience/japan-dashboard.html>.

In response to Near-Term Task Force Recommendation 2.1, the NRC requested that licensees and applicants reevaluate the seismic and flooding hazards at their sites. At the Watts Bar nuclear power plant, TVA is implementing Recommendation 2.1 by reevaluating flooding and seismic hazards at both Unit 1 and Unit 2 using present-day methodologies and information, and determining the impact of these updated hazards on their facility. The Near-Term Task Force seismic and flooding reevaluation activities and the associated NRC staff assessments are complex and the agency will need several years to complete these tasks. Once the NRC obtains the results of these assessments, the NRC will determine if safe operation requires additional regulatory action. Such regulatory action could include updating the licensing basis or requiring modification of the facility. The Near-Term Task Force concluded that continued licensing activities do not pose an imminent risk to the public health and safety. Given that conclusion, the NRC does not see a need to defer the issuance of the Unit 2 operating license until these reevaluations and any potential followup actions are complete. In addition TVA must implement certain near-term post-Fukushima actions for the Watts Bar site before a license can be issued. This includes the mitigating strategies under Order EA-12-049, which will provide additional protection against beyond design basis events. TVA is required to meet a schedule for Near-Term Task Force-related requests for information that is consistent with the flooding and seismic reevaluation schedule for Watts Bar Unit 1 as well as all other operating reactors. TVA is scheduled to submit their flooding hazard reevaluation before the NRC expects to make an operating license decision for Unit 2. If the reevaluated flooding hazard is higher than the design basis, TVA will be required to provide their plans for implementing compensatory measures.

In your letter, you express concern about the opportunities for public participation given the late stages of the Watts Bar Unit 2 operating license application review. The NRC strives to achieve its mission to protect public health and safety in a manner that is transparent and accessible to interested members of the public. The NRC staff is coordinating regular public meetings and teleconferences with TVA to address significant licensing issues. You can find the schedule for upcoming public meetings and teleconferences at the NRC's public Web site at <http://meetings.nrc.gov/pmns/mtg>. Furthermore, if the licensing basis is updated by amendment after the Watts Bar Unit 2 operating license is issued as a result of the NRC's assessment of the seismic or flooding hazard reevaluations, the public will have an opportunity to comment and request a hearing.

The NRC takes reactor safety very seriously. To ensure a quality review, the NRC developed a custom-tailored approach for licensing and inspection activities at Watts Bar Unit 2. The NRC is also dedicated to ensuring that nuclear power plants implement recommendations from the Near-Term Task Force in a timely manner and take appropriate actions to enhance reactor safety as needed. You can find more information regarding the licensing review of Watts Bar Unit 2 here: <http://www.nrc.gov/info-finder/reactor/wb/watts-bar.html>. The NRC welcomes your participation and feedback. Please feel free to let us know how we can enhance your awareness of ongoing regulatory activities at Watts Bar Unit 2. Justin Poole, the Watts Bar Unit 2 senior project manager, can assist you in answering questions you may have about upcoming Watts Bar Unit 2 meetings, project milestones, and licensing activities. He can be reached at [justin.poole@nrc.gov](mailto:justin.poole@nrc.gov) or 301-415-2048.

Sincerely,

*/RA/*

William M. Dean, Director  
Office of Nuclear Reactor Regulation

The NRC takes reactor safety very seriously. To ensure a quality review, the NRC developed a custom-tailored approach for licensing and inspection activities at Watts Bar Unit 2. The NRC is also dedicated to ensuring that nuclear power plants implement recommendations from the Near-Term Task Force in a timely manner and take appropriate actions to enhance reactor safety as needed. You can find more information regarding the licensing review of Watts Bar Unit 2 here: <http://www.nrc.gov/info-finder/reactor/wb/watts-bar.html>. The NRC welcomes your participation and feedback. Please feel free to let us know how we can enhance your awareness of ongoing regulatory activities at Watts Bar Unit 2. Justin Poole, the Watts Bar Unit 2 senior project manager, can assist you in answering questions you may have about upcoming Watts Bar Unit 2 meetings, project milestones, and licensing activities. He can be reached at [justin.poole@nrc.gov](mailto:justin.poole@nrc.gov) or 301-415-2048.

Sincerely,

*/RA/*

William M. Dean, Director  
Office of Nuclear Reactor Regulation

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**\*email concurrence**

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