



Tennessee Valley Authority, 1101 Market Street, BR4A, Chattanooga, Tennessee 37402

April 10, 2015

Mr. Vojin Janjić
Manager, Permit Section
Tennessee Department of Environment
and Conservation
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 12th Floor
Nashville, Tennessee 37243

Dear Mr. Janjić:

TENNESSEE VALLEY AUTHORITY (TVA) – SEQUOYAH NUCLEAR PLANT (SQN) - NPDES PERMIT NO. TN0026450 – COMMENTS ON DRAFT NPDES PERMIT

TVA has reviewed the subject draft permit dated March 9, 2015, and offers the following comments for your consideration:

1. Page 1 and 25:
 - a. To alleviate the need for preparing a separate water quality certification for the Nuclear Regulatory Commission, TVA requests that the following sentence be inserted in the first paragraph of Part I.A: *This TN-NPDES permit also constitutes the State's certification under Section 401 of the Clean Water Act for the purpose of obtaining any federal license for activities resulting in the discharges covered under the TN-NPDES permit.* This is consistent with language found in TN0020168 for Watts Bar Nuclear Plant.
 - b. TVA requests the sample type for Total Residual Chlorine (TRC) at Outfall 101 be changed from calculated only to *Calculated or Grab*. While the calculated discharge concentration would continue to be the primary method used for reporting TRC, having the provision to collect grab samples at 101 for TRC would give flexibility to the plant when unusual situations arise.
 - c. TVA requests the following footnote be added below table for Outfall 101: *To ensure compliance with Total Suspended Solids limits, Polymers and/or coagulants may be utilized on an as-needed basis in a way that does not cause or contribute to toxicity at Outfall 101 discharge.*
2. Page 5 of 25: TVA requests the footnote under Outfall 103 table be changed to the following: *In the event the turbine building sump is discharged directly to the CCW channel or the yard drainage pond, TSS, Oil and Grease, and pH shall be monitored 1/Week and reported with the Discharge Monitoring Report for the applicable reporting period.*

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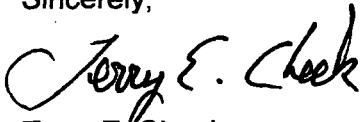
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3. Page 22 of 25:

- a. In the renewal permit, please remove the language found in Part III.F.2. As a condition of the previous permit and in order to further support continuation of the 316(a) alternative thermal limit, TVA developed and conducted a comprehensive study of the effects of the thermal discharge on the fish and wildlife community of Chickamauga Reservoir. There have been no significant changes to SQN design and/or operations since the specialized study was developed (2011) that would bring about material changes to the established characteristics of the thermal discharge, and no changes are reasonably foreseen for the term of the next permit cycle. TVA believes the existing 316(a) study plan will continue to be adequate during the next permit cycle, and TVA's Reservoir Fish Assemblage Index will be used to assess the overall health of the fish community in Chickamauga Reservoir.
- b. Please add the following language to the introduction section of Part III.G: *"If the permit is issued effective with less than 5 years in the permit cycle, the permittee may be granted an extension by the Division upon request and as needed to complete the required 316(b) studies."*

TVA also requests a 30-day period between the issuance date and the effective date of the reissued permit to facilitate internal distribution of the permit. If you have questions or need additional information, please call Travis Markum at (423) 751-2795 in Chattanooga or by email at trmarkum@tva.gov.

Sincerely,



Terry E. Cheek
Senior Manager
Water Permits, Compliance and Monitoring

cc: Ms. Jennifer Innes
Manager, Chattanooga Environmental Field Office
TDEC Division of Water Resources
1301 Riverfront Parkway
Suite #206
Chattanooga, Tennessee 37402

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555