



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

December 16, 2016

Mr. Vojin Janjić  
Manager, Water-Based Systems  
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) – WATTS BAR NUCLEAR PLANT (WBN) - NPDES PERMIT NO. TN0020168 – COMMENTS ON DRAFT NPDES PERMIT

TVA has reviewed the subject draft permit dated November 17, 2016, and offers the following comments for your consideration:

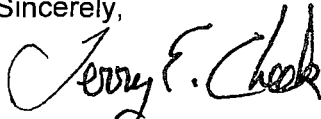
1. On Page 2 under Outfall 101 and 102 table:
  - a. TVA requests that footnote 1 be modified to the following: *Flow shall be reported in Million Gallons per Day (MGD). If the **primary** flow measurement device is out of service, **flow may be calculated or estimated by alternate or secondary flow measurement devices.***
  - b. TVA requests that footnote 4 be modified to the following: *If the **primary** temperature monitoring equipment fails, monitoring will be done once per day. Reasonable and timely effort will be made to restore a temperature recorder to operation as soon as possible. See Part III for further temperature requirements. **Secondary temperature measurement devices may be installed and calibrated for continuous use.***
2. On Page 4, TVA requests that a narrative condition under Outfall 103 table be added with the following language: *In the event the turbine building station sump is discharged directly to the Yard Holding Pond, then TSS, Oil and Grease, and pH shall be monitored 1/Week and reported with the Discharge Monitoring Report for the applicable reporting period.*
3. Page 9, TVA requests the following narrative condition be added with the following language: *To ensure compliance with Total Suspended Solids limits, polymers and/or coagulants may be utilized in the Lined/Unlined Ponds, Low Volume Waste Treatment Pond, or Yard Holding Pond on an as-needed basis in a way that does not cause or contribute to toxicity at Outfall 101 discharge.*

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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](mailto:trmarkum@tva.gov).

Sincerely,

A handwritten signature in black ink that reads "Terry E. Cheek". The signature is written in a cursive style with a large, stylized "T" and "C".

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

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