

This letter is decontrolled when separated from Enclosure 1, Section B, Appendix H, Attachment 1



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

CNL-19-040

May 21, 2019

10 CFR 50.4

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, and 50-296

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating License Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: Submittal of Topical Report TVA-NPG-AWA16-A, "TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041, Revision 1" (EPID L-2016-TOP-0011)

- References:
1. TVA Letter to NRC, "Request for Review and Approval of Topical Report TVA-NPG-AWA16, 'TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041'," dated September 20, 2016 (ML16264A454)
 2. Electronic Mail from NRC to TVA, "Request For Additional Information Related to TVA Fleet Topical Report TVA-NPG-AWA16 (EPIC: L-2016-TOP-0011)," dated February 23, 2018 (ML18057A637)
 3. TVA Letter to NRC, "Tennessee Valley Authority Response to NRC Request for Additional Information Related to Topical Report TVA NPG-AWA16, 'TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041'," dated April 19, 2018 (ML18117A225)

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4. TVA Letter to NRC, "Request for Review and Approval of Topical Report TVA-NPG-AWA16, 'TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041', Revision 1," dated June 22, 2018 (ML18192A510)
5. TVA Letter to NRC, "Topical Report TVA-NPG-AWA16, 'TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041,' Revision 1, Supplemental Information," dated September 6, 2018 (ML18262A091)
6. NRC Letter to TVA, "Final Safety Evaluation for Tennessee Valley Authority Topical Report "TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis Calculation CDQ0000002016000041,' Rev. 1 (EPID L-2016-TOP-0011)," dated March 18, 2019 (ML19010A212)

By letter dated September 20, 2016 (Reference 1), Tennessee Valley Authority (TVA) submitted topical report TVA-NPG-AWA16, "TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041," for review and approval. Approval of the Topical Report was requested to support Probable Maximum Flood calculations and associated with planned License Amendment Requests for Sequoyah Nuclear Plant (SQN), Units 1 and 2, and Watts Bar Nuclear Plant (WBN), Units 1 and 2, and a potential License Amendment Request for Browns Ferry Nuclear Plant, Units 1, 2, and 3.

By email dated February 23, 2018 (Reference 2), NRC forwarded a Request for Additional Information (RAI) associated with the NRC review of the topical report. TVA responded to the NRC RAI by letter dated April 19, 2018 (Reference 3). As described in the Enclosure of Reference 3, a revision to Topical Report TVA-NPG-AWA16 was required to fully resolve the RAIs associated with dew point climatology.

Topical Report TVA-NPG-AWA16, Revision 1, was submitted for NRC review and approval by letter dated June 22, 2018 (Reference 4). Supplemental information to support the review of Topical Report TVA-NPG-AWA16, Revision 1, was provided by letter dated September 6, 2018 (Reference 5).

By letter dated March 18, 2019 (Reference 6), NRC issued its final safety evaluation for Topical Report TVA-NPG-AWA16, Revision 1, documenting the staff conclusion that the topical report provides reasonable estimates of the probable maximum precipitation that can have an impact on the operating nuclear plants in the TVA basin.

The NRC also requested that TVA submit an approved version of the topical report within three months of TVA's receipt of the letter. Accordingly, Enclosure 1 of this letter provides Topical Report TVA-NPG-AWA16-A, 'TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041,' Revision 1. As requested, the approved topical report incorporates the March 18, 2019, NRC letter and its enclosures. The approved topical report also provides historical review correspondence, including NRC

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requests for additional information and TVA's responses (References 1 through 5). This information is provided at the end of Enclosure 1. A table of contents is provided after the topical report cover page to assist in locating the referenced historical documents.

Applied Weather Associates (AWA) considers portions of the data supporting the topical report (Enclosure 1, Appendix H, Attachment 1) to be proprietary and therefore exempt from public disclosure pursuant to 10 CFR 2.390. An affidavit for withholding information, executed by AWA, is provided in Enclosure 2. Therefore, on behalf of AWA, TVA requests that Enclosure 1, Section B, Appendix H, Attachment 1 be withheld from public disclosure in accordance with the AWA affidavit and the provisions of 10 CFR 2.390.

There are no regulatory commitments associated with this submittal. Please address any questions regarding this request to Russell Thompson at 423-751-2567.

Respectfully,

E. K. Henderson
Director, Nuclear Regulatory Affairs

Enclosures:

1. TVA-NPG-AWA16-A, "TVA Overall Basin Probable Maximum Precipitation and Local Intense Precipitation Analysis, Calculation CDQ0000002016000041," Revision 1 [Includes two disks with data for Section B, Appendix H]
2. Affidavit - Applied Weather Associates

cc (Enclosures):

NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRR Project Manager - Browns Ferry Nuclear Plant
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRR Project Manager - Sequoyah Nuclear Plant
NRR Senior Resident Inspector - Watts Bar Nuclear Plant
NRR Project Manager - Watts Bar Nuclear Plant

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bcc (w/o Enclosures):

S. M. Bono
M. A. Brown
C. C. Chandler
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S. M. Douglas
C. D. Dunn
K. D. Dutton
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T. B. Marshall
E. C. Meisner
J. L. Paul
W. K. Paulhardt
J. T. Polickoski
M. M. Rasmussen
T. S. Rausch
J. W. Shea
W. P. Trombley
A. L. Williams
ECM

Enclosure 2

Affidavit – Applied Weather Associates

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by Applied Weather Associates to determine whether information should be classified as proprietary:

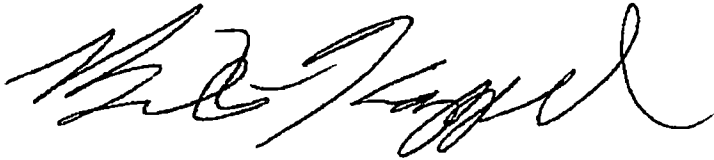
- (a) The information reveals details of Applied Weather Associates' research and development processes or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for Framatome.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for Applied Weather Associates in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by Framatome, would be helpful to competitors to Framatome, and would likely cause substantial harm to the competitive position of Applied Weather Associates.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(d) and 6(e) above.

7. In accordance with Applied Weather Associates' policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside Applied Weather Associates only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. Applied Weather Associates policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.



SUBSCRIBED before me this 18
day of June, 2018.



JORDYN GILLILAND
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20184015409
MY COMMISSION EXPIRES APRIL 06, 2022