# TENNESSEE VALLEY AUTHORITY

5B Lookout Place

Chattanooga, Tennessee 37402-2801 December 12, 1990

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

Gentlemen:

In the Matter of Tennessee Valley Authority Docket Nos. 50-327 50-328

SEQUOYAH NUCLEAR PLANT (SQN) - ANNUAL ENVIRONMENTAL OPERATING REPORT

The enclosure contains the Annual Environmental Operating Report for SQN for the period from September 15, 1989, through September 14, 1990. This report is submitted in accordance with Appendix B Technical Specification 5.4.1.

Please direct questions concerning this issue to J. D. Smith at (615) 843-6172.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

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Enclosures cc (Enclosures):

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#### ENCLOSURE 1

## TENNESSEE VALLEY AUTHORITY SEQUOYAH NUCLEAR PLANT (SQN)

ANNUAL ENVIRONMENTAL OPERATING REPORT September 15, 1989, through September 14, 1990

- 1. In accordance with Technical Specification (TS) 5.3.C, facility design and operational changes were reviewed for potential effect on the environment. A study of facility design and operational changes from September 15, 1989, through September 14, 1990, that could have affected the environment was performed. Projects considered to have potential impact on the environment included (1) those involving excavation, construction, or asbestos removal; and (2) those resulting in new or increased discharges to outside drains. The study identified and documented a basis that the design and operational changes did not involve an unreviewed environmental question. A copy of this study is attached (attachment 1).
- In accordance with TS 5.4.1, the following reports have previously been submitted to NRC as specified in the SQN National Pollutant Discharge Elimination System (NPDES) Permit No. TN0026450:

Report on results of Nonradiological Aquatic Monitoring Program - Rotenone Studies, submitted July 5, 1990.

Report on Investigation of Plant Impact on Dissolved Oxygen Levels in Chickamauga Reservoir, submitted September 27, 1990.

- 3. The following information is provided as required by TS 5.4.1:
  - a. All environmental technical specifications (ETS) noncompliances and the corrective actions taken to remedy them.

There were no ETS noncompliances during the reporting period.

b. Changes made to applicable State and Tederal permits and certifications:

On September 29, 1989, the Tennessee Division of Water Pollution Control terminated the permit to hold and haul sewage from DSN 113. The need for the permit was eliminated by connecting part of the plant sewers to the Soddy-Daisy municipal system.

On January 30, 1990, the Chattanooga-Hamilton County Air Pollution Control Bureau issued the following permits: Installation permit No. 4150-30700804-06I and temporary operating permit No. 4150-3070804-06T for the Maintenance Insulators Shop; installation permit No. 4150-30700804-07I and temporary operating permit No. 4150-30700804-07T for the Modifications Insulators Shop.

c. Changes in station design that could involve a significant environmental impact or change the findings of the Final Environmental Statement (FES).

As concluded in attachment 1, there have been no facility design or operational changes since September 15, 1989, that have resulted in an unreviewed environmental question.

d. All nonroutine reports submitte in accordance with ETS Section 4.1.

On April 2, 1990, a report of oil spills on July 10, 1989, and February 3, 9, and 15, 1990, was submitted to EPA. Individual telephone notifications of these events were made to the National Response Center and to NRC.

On May 8, 1990, a Report on Investigation of Alternatives for Prevention of Damage to Fish and Aquatic Life from Discharges at Tennessee Valley Authority's Sequoyah Nuclear Plant was submitted to the Tennessee Department of Health and Environment.

On July 9, 1990, approximately 257 dead fish were observed in the diffuser pond. The cause of the fishkill was thermal stress.

Copies of the reports for the above incidents have been provided in accordance with TS requirements.

e. Changes in approved ETS.

There were no changes made during this report period.

#### ATTACHMENT 1

STUDY OF SEQUOYAH NUCLEAR PLANT (SQN)
DESIGN AND OPERATIONAL CHANGES
BETWEEN SEPTEMBER 15, 1989, AND SEPTEMBER 14, 1990
FOR EFFECTS ON THE ENVIRONMENT

Facility design and operational changes made during this report period have been reviewed for potential to affect the environment as described below. The criteria used to identify those projects with a potential for environmental effects included (1) those involving excavation, construction, or asbestob removal; and (2) those resulting in new or increased discharges to outside drains.

Before 1988 non-temporary modifications were controlled by administrative procedures which required all workplans meeting the above criteria to receive an environmental evaluation. The new projects authorization procedures were revised several times and by mid-1989 all new projects or "new issues" were getting an environmental review. Therefore, the new issues documents were used to make the environmental review determination instead of workplans.

1. The following projects met the above criteria for potential environmental effects and were reviewed for potential impact on the environment:

### a. New Issues

- New fire protection system for diesel generator building
- Employee cafeteria
- Unit 2 Main Turbine asbestos removal
- Unit 2 Feedwater Heater replacement
- Reclamation of PCB-contaminated Low Volume Waste Treatment Pond
- Replace relay room plaster ceiling
- Spent fuel storage alternatives

### b. Special Tests

- There were no special tests conducted during this period that met the environmental impact criteria.

#### c. Temporary Alterations

- There were no temporary alterations made during this period that met the environmental impact criteria.

- Design and operational changes with a potential for causing new or increased discharges to outside drains, including runoff from excavation, were reviewed and determined to be within the scope of the SQN NPDES permit.
- 3. Monthly discharge monitoring reports submitted as required by the SQN NPDES permit were reviewed. Permit excursions were attributed to either equipment malfunctions or operational errors and determined to be within the purview of the NPDES permit and associated environmental evaluations.

In summary, there have been no facility design or operational changes from September 15, 1989, to September 14, 1990, that have resulted in an unreviewed environmental question.