



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 28, 2024

**CLINCH RIVER NUCLEAR SITE – AUDIT PLAN FOR EXCAVATION EXEMPTION
REQUEST TECHNICAL TOPICS
(EPID NUMBER: L-2024-LLE-0002)**

APPLICANT INFORMATION

Applicant: Tennessee Valley Authority
Applicant Address: 400 West Summit Hill Drive, Knoxville, TN 37902
Site Name: Clinch River Nuclear Site
Docket No.: 99902056

Background:

By letter dated November 30, 2023 (Agencywide Documents Access and Management System (ADAMS) ML23335A100), the Tennessee Valley Authority (TVA) submitted to the U.S. Nuclear Regulatory Commission (NRC), a request for exemption from Title 10 of the *Code of Federal Regulations* (10 CFR) 50.10(c) to allow excavation at the Clinch River Nuclear Site, pursuant to 10 CFR 50.12, "Specific Exemptions." By letter dated January 31, 2024 (ML24009A168), the NRC issued a letter accepting TVA's exemption request for docketing. Supplemented with information from NRC's Early Site Permit Environmental Impact Statement (ML19087A266) and TVA's "Clinch River Nuclear Site Advanced Nuclear Reactor Technology Park Final Programmatic Environmental Impact Statement" (87 FR 59860), the staff is reviewing the information in the exemption request (ML23335A100) per 10 CFR 51. In accordance with 10 CFR 51.21 the staff is preparing an environmental assessment to evaluate the environmental impacts from the proposed action.

Purpose:

In its initial review of data and information within the corresponding context of the exemption request, the staff has identified information needs (Attachment 1) that would promote a better understanding of the detailed analysis and bases underlying the exemption request related to an anticipated construction permit (CP) application. This environmental audit will provide the NRC staff an opportunity to discuss these items with the applicant subject matter experts, staff and contractors. During the audit, the staff will discuss a wide range of environmental matters related to land use, ground and surface water, terrestrial and aquatic ecology, human health, radiological and non-radiological waste, cultural resources, alternatives to the proposed action, air quality and noise. The audit will allow the staff to better understand the site, environmental interfaces of the project, and modeling results, in order to draw appropriate conclusions. If the NRC staff identifies information that is needed to support a finding, TVA will need to submit that information on the application docket.

Regulatory Audit Basis

Requirements for submittal of environmental information useful in complying with Section 102(2)(C) of the National Environmental Policy Act of 1969, as amended are included 10 CFR 51.41. The evaluation of information provided will be used to address the potential impacts of the proposed excavation on the environment and evaluate alternatives or mitigations that may reduce or eliminate these impacts.

Regulatory Audit Scope

Audit team members will review documents and other requested information outlined in the information needs list (Attachment 1). Although additional information needs may be developed and amended to this audit, the staff has included the attached information need topics for discussions with TVA in the interest of a more efficient review.

Environmental Review Team

The table below includes a list of the NRC's environmental review team assigned to the TVA environmental assessment (EA) and CP review and their role or review area coverage. The complete team is listed although not all members of the review team will be needed for participation in the development of the EA. Additionally, the NRC staff may participate in some audit discussions based on coordination with related reviews.

Technical Areas	Subject Matter Expert
Branch Chief	Daniel Barnhurst
Environmental Project Managers	Joseph Giacinto, Tamsen Dozier, Madelyn Nagel
Accidents / Transportation	Don Palmrose, Brian Glowacki ^b , Jon Napier ^a , Michael Smith ^a , Steve Maheras ^a
Air Quality / Meteorology / Noise	Saikat Ghosh ^a , Kim Leigh ^a
Cultural Resources	Beau Goldstein, Cyler Conrad ^a , Doug Mcfarland ^a
Decommissioning	Jon Napier ^a , Michael Smith ^a
Ecology	Peyton Doub, Brandon Boehnke ^a , Dana Vesty ^a , Ann Miracle ^a
Environmental Justice	Adrienne Rackley ^a , Dave Anderson ^a
Fuel Cycle / Health Physics	Don Palmrose, Brian Glowacki ^b , Jon Napier ^a , Michael Smith ^a
Hydrogeology / Climate Change	Kazi Tamaddun ^a , Becka Bence ^a , Phil Meyer ^a
Land Use & Visual	Dana Vesty ^a , Dave Anderson ^a
Non-Rad Human Health	Kimberly Leigh ^a
Non-Rad Waste	Harish Gaday ^a , Michael Smith ^a
Production	Mike Parker ^a
Radiological Waste	Don Palmrose, Jon Napier ^a , Michael Smith ^a
Socioeconomics	Lin Zeng ^a , Dave Anderson ^a
Surface Water Hydrology	Kazi Tamuddun ^a , Rajiv Prasad ^a

Additional audit team members may be added as needed.

^a Pacific Northwest National Laboratory staff

Information and Other Material Necessary for the Regulatory Audit

Entrance Meeting March 2024

Exit Meeting Approximately May 2024, a precise date and time TBD

The NRC staff requests that all the documents and other requested information identified in Attachment 1 be provided by TVA on the online reference portal.

Logistics

Entrance Meeting March 2024

Exit Meeting May 2024 (Tentative)

Audit meetings will take place in a virtual format, using Microsoft Teams, or via other, similar platform. The NRC and TVA audit managers will schedule meetings as needed upon TVA's review of this audit plan. The audit duration is anticipated to be approximately sixty days with activities occurring periodically during the first week and intermittently thereafter. For each topical area, follow up sessions will be scheduled, if needed, until audit closure.

Special Requests

The NRC staff requests that TVA ensure that their technical staff are available to answer questions during the audit.

Deliverables

At the completion of the audit, an exit meeting will be held at which time a summary of audit activities and discussions will be presented along with the status of staff information needs identified as part of the audit. In addition, the audit team will issue an audit summary within sixty days after the exit meeting. The audit summary will be declared and entered as an official agency record in ADAMS and be made available for public viewing through the publicly available records component of ADAMS.

Contacts

Please contact Joseph Giacinto at 301-415-0714 or via email at Joseph.Giacinto@nrc.gov or Tamsen Dozier at 301-415-2272 or via email at Tamsen.Dozier@nrc.gov concerning any issues related to the conduct of the audit.

Agenda: March 5, 2024
Audit Plan for Early Excavation Exemption Request, Clinch River Nuclear Site

Tuesday, March 5, 2024

- 01:00-01:15** Audit Entrance/Introductions [NRC/TVA]
- 01:15-01:45** Overview presentation on Early Excavation Exemption Request and TVA’s approach to addressing Attachment 1 information needs^b [TVA]
- 01:45-3:30** Review and discussion of audit items/information needs (Attachment 1) [NRC/TVA]
- 03:30-03:45** NRC Internal Caucus..... [NRC]
- 03:45-04:45** Audit Exit^c [NRC/TVA]
- 04:45** Adjourn

^b Electronic Reading Room documents should be available for discussion.

^c The audit exit date and time will be deferred if additional audit interactions are needed to complete the audit.

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Dated: February 28, 2024

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