

**From:** Kajumba, Ntale <Kajumba.Ntale@epa.gov>  
**Sent:** Friday, May 3, 2024 11:02 PM  
**To:** Stacy Schumann; BrownsFerryEnvironmental.Resource  
**Subject:** [External\_Sender] EPA Scoping Comments on Browns Ferry Nuclear Plant  
**Attachments:** Browns Ferry Nuclear Plant Scoping \_NRC.pdf

Good evening,

Please see EPA's scoping comments on Browns Ferry Nuclear Plant EIS. If you have any questions about the attached comments, please contact Larry Long at [Long.Larry@epa.gov](mailto:Long.Larry@epa.gov) or Ntale Kajumba at [Kajumba.Ntale@epa.gov](mailto:Kajumba.Ntale@epa.gov).

Ntale

Ntale Kajumba, Manager  
National Environmental Policy Act  
U.S. EPA Region 4  
Office: (404) 562-9620  
Email: [Kajumba.ntale@epa.gov](mailto:Kajumba.ntale@epa.gov)

**Federal Register Notice:** 89FR23056  
**Comment Number:** 2

**Mail Envelope Properties** (SA0PR09MB7322DA3D08896A91DC72E40AF91E2)

**Subject:** [External\_Sender] EPA Scoping Comments on Browns Ferry Nuclear Plant  
**Sent Date:** 5/3/2024 11:02:03 PM  
**Received Date:** 5/3/2024 11:02:36 PM  
**From:** Kajumba, Ntale

**Created By:** Kajumba.Ntale@epa.gov

**Recipients:**

"Stacy Schumann" <Stacy.Schumann@nrc.gov>

Tracking Status: None

"BrownsFerryEnvironmental.Resource" <BrownsFerryEnvironmental.Resource@nrc.gov>

Tracking Status: None

**Post Office:** SA0PR09MB7322.namprd09.prod.outlook.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	447	5/3/2024 11:02:36 PM
Browns Ferry Nuclear Plant Scoping _NRC.pdf		245170

**Options**

**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**



## REGION 4

ATLANTA, GA 30303

May 3, 2024

Stacy Schumann  
U.S. Nuclear Regulatory Commission  
Office of Administration,  
Mail Stop: TWFN-7-A60M  
Washington, DC 20555-0001  
ATTN: Program Management

RE: Notice of Intent to Conduct Scoping Process and Prepare an Environmental Impact Statement for the Tennessee Valley Authority's Browns Ferry Nuclear Plant, Units 1, 2, and 3 and Docket Nos. 50-263, 50-260, and 50-296; NRC-2024-0030

Dear Stacy Schumann:

The U.S. Environmental Protection Agency has reviewed the Nuclear Regulatory Commission's Notice of Intent to prepare an Environmental Impact Statement, for the TVA Brown Ferry Nuclear Plants, Units 1,2, and 3 in accordance with Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act. The CAA Section 309 role is unique to EPA. It requires the EPA to review and comment on any proposed federal action subject to NEPA's environmental impact statement requirement and to make its comments public.

The purpose of the proposed EIS is to address the environmental effects associated with the subsequent license renewal of the facility operating license Nos. DPR-33, DPR-52, and DPR-68 for the Browns Ferry Nuclear Plant, Units 1, 2, and 3. According to the NOI, the SLR would authorize the applicant to operate the Brown Ferry facility for an additional 20 years beyond the period specified in each for the current licenses. The current renewed facility operating license for Units 1, 2, and 3, expire at midnight on December 20, 2033, June 28, 2034, and July 2, 2036, respectively.

Based on the EPA's review of the NOI, the EPA recommends that the EIS evaluate the potential effects of the proposed project and describe efforts to address the following potential impacts of the proposed action in the EIS.

(1) Indirect and Cumulative Impacts- Nuclear facilities generally have several potential indirect and cumulative project impacts that are of concern and should be discussed and appropriately addressed in the EIS. These impacts include but are not limited to; the potential for radionuclides discharges to surface water and groundwater, spent nuclear fuel storage, contaminant transport and deposition, stormwater, potential impacts of severe storm events affected by climate change, and analysis of communities with Environmental Justice concerns.

(2) Nuclear Waste Storage - Liquid, gaseous, and solid radioactive waste management systems can collect and create radioactive byproducts from spent nuclear fuel if required for continued on-site storage. Due to the uncertainty regarding the future availability of a geologic repository or other away-from-reactor storage facility, on-site storage is required, until a permanent repository is established. The EIS should discuss and evaluate concerns regarding potential flooding and other storm events. As part of this process, storage plans for spent nuclear fuel should be evaluated to prevent contamination in the event of flooding at the site. The EIS should indicate if there will be any changes in the generation of waste including low-level radioactive waste, mixed low-level radioactive waste, transuranic waste, and hazardous and Toxic Substance Control Act wastes over the life of the program. The EIS should indicate where the applicant will transport the spent nuclear fuel and spent fuel debris offsite for storage pending long-term disposal options.

(3) National Pollution Discharge Elimination System - The EIS should discuss a water balance analysis and provide additional information from past studies, if any.

(4) Wetlands and Streams - To support wetland and stream mitigation decisions and to help evaluate potential stream impact requirements, information regarding CWA Section 404(b)(1) should be included in the EIS. Providing adequate wetland and stream information within the NEPA process can help to streamline the final environmental review and permitting processes for these resources. The EIS should provide a detailed discussion regarding the potential significant impacts to state and federal resources.

(5) Climate Resilience - Climate change may impact the proposed project, posing threats to aging infrastructure, worker health and safety and the environment. We recommend that the EIS include an evaluation of climate related impacts including discussions of frequency and severity of major storm events, wildfires, or drought that could lead to power disruptions or increased cooling demands in summer months. Efforts that applicant is taking to address and adapt to potential climate impacts should also be discussed in the EIS.

(6) Environmental Justice- Executive Order 12898 directs federal agencies to identify and address any disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority, low-income, tribal, and indigenous populations. The analysis should indicate whether minority, low income, tribal, and indigenous populations reside or use resources within the vicinity of the proposed project area. It would also be helpful to include a current map depicting the population demographics near the facility. The EJ analysis should comply with Executive Orders 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations and E.O. 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, dated April 21, 2023. The Environmental Justice Interagency Working Group's Promising Practices for EJ Methodologies in NEPA Reviews, dated March 2016, provides guiding principles agencies can consider ([https://www.epa.gov/sites/default/files/201608/documents/nepa\\_promising\\_practices\\_document\\_2016.pdf](https://www.epa.gov/sites/default/files/201608/documents/nepa_promising_practices_document_2016.pdf)).

Please consider using the NEPAAssist tool (<https://www.epa.gov/nepa/nepassist>) in addition to localized data sources and tools, when conducting the NEPA analysis. Public input should also be included as part of the NEPA analysis to help provide for a more transparent document. The EJ analysis should include meaningful engagement that:

- provides timely opportunities for the public to share information or concerns and participate in decision-making processes.
- fully considers public input provided as part of decision-making process.
- provides technical assistance, tools, and resources to assist in facilitating meaningful and informed public participation, whenever practicable and appropriate.
- seeks out and encourages the involvement of persons and communities potentially affected by Federal activities by:
  - ensuring that agencies offer or provide information on this proposed project in a manner that provides meaningful access to individuals with limited English proficiency and is accessible to individuals with disabilities, if applicable
  - providing notice of and engages in outreach to communities or groups of people who are potentially affected and who are not regular participants in Federal decision-making; and
  - addressing, to the extent practicable and appropriate, other barriers to participation that individuals may face.

Assessing data using EJScreen (<https://www.epa.gov/ejscreen>), the EPA’s nationally consistent environmental justice (EJ) screening and mapping tool, is a useful first step in understanding or highlighting geographic locations that may need further review or outreach. The tool provides information on environmental and socioeconomic indicators as well as pollution sources, health disparities, critical service gaps, and climate change data. The tool can help identify potential community vulnerabilities by calculating EJ Indexes and displaying other environmental and socioeconomic information in color-coded maps and standard data reports.

If communities with EJ concerns, among others, are located within the vicinity of the proposed project area or potentially affected by the proposed project, the EPA recommends the NRC meaningfully involve these communities throughout the decision-making process to help identify potential benefits, burdens, mitigation opportunities associated with relicensing and permitting decisions. Adaptive and innovative approaches to both public outreach and community involvement should be implemented during the project planning.

The EPA appreciates the opportunity to provide comments on the proposed project. If you have any questions regarding our comments, please contact Larry Long of the NEPA Section by phone at (404) 562-9460, or by e-mail at [long.larry@epa.gov](mailto:long.larry@epa.gov).

Sincerely,

Ntale Kajumba  
NEPA Manager