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To: [Donahue, Peter John](#); [Bashore, Joseph Herbert](#); [Victor, William Ross](#); [Baker, William J](#)
Cc: [Angela Sabet](#); [Steve Koenick](#); [Kim Conway](#)
Subject: February 6, 2025 Clarification Call Summary re RAI HCR-14, and Revised RCI AQU-23
Date: Friday, February 7, 2025 12:05:00 PM
Attachments: Revised RCI AQU-23.pdf

Hello, here is a summary of our clarification call today, February 6, 2025. The NRC and TVA held a clarification call regarding RAI HCR-14 (ML25007A078):

REQUIREMENT: The requirements in 36 CFR § 800.4(1) direct Federal agencies to identify historic properties, including background research, consultation, oral history interviews, sample field investigation, and field survey. Additionally, 10 CFR 51.41 indicates that NRC may direct the applicants to provide NRC information to complete their NEPA process.

ISSUE: NRC requested archaeological survey reports of the following reports listed below. TVA provided redacted archaeological reports via the Cetrec portal, redacting necessary information needed for NRC's confirmatory review.

REQUEST: Provide the following unredacted archaeological and architectural reports to support NRC's draft EIS:

- Dison et al. 2022: A Phase I Archaeological Survey of Previously Unsurveyed Areas within the Tennessee Valley Authority's Browns Ferry Nuclear Plant in Limestone County, Alabama. Prepared by Tennessee Valley Archaeological Research, Huntsville, Alabama
- Dison et al. 2020: A Phase I Archaeological Survey of Browns Ferry Nuclear Plant Meteorological Tower Tree Clearing Project in Limestone County, Alabama. Prepared by Tennessee Valley Archaeological Research, Huntsville, Alabama.
- Reynolds Mike. 2022. Historic Architectural Resources Survey of the Browns Ferry Nuclear Plant Project, Limestone County, Alabama. Prepared by Brockington and Associates, Inc., Atlanta, Georgia
- Marshall 2013: A Phase I Archaeological Survey for the Trinity-Browns Ferry Nuclear Plant 161-kV Transmission Linen Project, Limestone and Morgan Counties, Alabama. Prepared by Tennessee Valley Archaeological Research, Huntsville, Alabama.
- Stanton 2013: Phase I Archaeological Survey of Tennessee Valley Authority's Browns Ferry-Athens 161-KV TL Rebuild and Associated Access Roads in Limestone County,

Alabama. Prepared by Tennessee Valley Archaeological Research, Huntsville, Alabama

- Karpynec and Weaver 2018: Phase I Architectural Assessment for the Tennessee Valley Authority's Browns Ferry Aquatic Research Facility, Limestone County, Alabama.

Prepared by Tennessee Valley Archaeological Research, Huntsville, Alabama

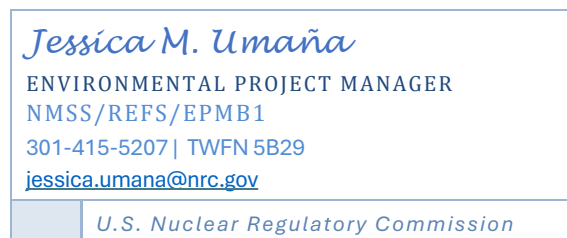
On January 30, 2025, the NRC and TVA held a clarification call regarding items RCI AQU-23 and HCR-9. HCR-9 was inadvertently incorrectly referenced in the meeting summary (ML25030A242). The correct item is RAI HCR-14 as discussed above. TVA plans to defer its responses to RCI AQU-23 and RAI HCR-14 to a separate submittal, independent of the RCI and RAI responses, as well as the ER supplement anticipated on February 14, 2025.

With regards to RCI AQU-23:

Please provide: TVA. 2022b. TVA BFN Power Plant National Pollutant Discharge Elimination System (NPDES) Permit No. AL0022080. Updated Final §316(b) Rule Information 40 CFR 122.21(r)(10) Submittal. January 2022.

During a clarification call held on January 30, 2025 (ML25030A242), NRC and TVA discussed audit need RCI AQU-23 (ML25007A078). AQU-23 requests TVA to provide a reference in their environmental report, "TVA. 2022b. TVA BFN Power Plant NPDES Permit No. AL0022080. Updated Final 316(b) Rule Information 40 CFR 122.21(r)(10) Submittal. January." The NRC is replacing the previous RCI AQU-23 because the original request involves proprietary information. Instead of requesting TVA to submit the proprietary report, which would delay its submittal due to the necessary proprietary determination and affidavit, the NRC is now requesting TVA to confirm specific information contained in the report. This approach will provide the necessary information to support the development of the DEIS without delays. The revised AQU-23 is attached

Thank You,



Jessica U.

Revised RCIAQU-23: Please confirm that the following two statements are accurate:

1. Chemical treatments are routinely scheduled regardless of data, however, this data aids in notifying the treatment team of large numbers of zebra mussels and Asiatic clams during the span of time between treatments. Browns Ferry Nuclear Plant's NPDES permit also allows TVA to remove bivalves via mechanical means (e.g., scraping) and to use molluscicides in accordance with EPA regulations and NPDES permit conditions, and
2. Since Browns Ferry has already installed modified traveling water screens, installing a fish return system that aligns with EPRI's "Design of Fish Return Systems and Operations/ Maintenance Guidelines," and completion of an optimization study will be the main tasks for them to complete this next NPDES permit cycle.