



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1208-B Main Street
Daphne, AL 36526

JUL 30 2025



2025-0062173

Mr. J. Peyton Doub
U.S. Nuclear Regulatory Commission
Washington, D.C., 20555-0001

Dear Mr. Doub:

Thank you for your letter dated July 3, 2025, requesting consultation on the U.S. Nuclear Regulatory Commission's (NRC) proposal to continue operation of Browns Ferry Nuclear Power Plant Units 1, 2, and 3 (Browns Ferry) for an additional 20 years. Our comments are provided in accordance with provisions of the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) (ESA).

Browns Ferry is a three-unit nuclear power plant, operated and maintained by the Tennessee Valley Authority (TVA) on the north shore of Wheeler Reservoir on an 880-acre site in Limestone County, Alabama at Tennessee River Mile (TRM) 294. The plant is approximately 10 miles northwest of Decatur, Alabama, and 10 miles southwest of Athens, Alabama. The current facility operating licenses from NRC to TVA for Units, 1, 2, and 3 expire at midnight on December 20, 2033; June 28, 2034; and July 2, 2036, respectively. The proposed action is for the NRC to determine whether to issue subsequent renewed operating licenses (SLRs) for Browns Ferry for an additional 20 years. If NRC renews the facility operating licenses, TVA would be authorized to operate Browns Ferry Unit 1 until December 20, 2053; Unit 2 until June 28, 2054; and Unit 3 until July 2, 2056.

We understand that TVA does not propose any construction, land clearing, or other ground-disturbing activities that would affect forest, wetland, or riparian habitats. The proposed action does not involve forest removal or management and generally would not disturb the existing forested habitat on the site. When necessary, TVA would continue to consult with the U.S. Fish and Wildlife Service (Service) in separate ESA Section 7 consultation for activities that are outside of TVA's bat programmatic consultation (Service *Biological Opinion, Programmatic Strategy for Routine Actions that may Affect Endangered or Threatened Bats* (2018), Service Log #: 04ET1000-2018-F-0017, Tennessee Ecological Services Office, Cookeville, Tennessee), as occurred for tree removals around the meteorology tower.

We understand that you determined this project may affect, but is not likely to adversely affect the following federally listed species:

- Gray bat (*Myotis grisescens*)—Endangered
- Indiana bat (*Myotis sodalist*)—Endangered
- Whooping crane (*Grus americana*)—Experimental Population, Non-Essential
- Monarch butterfly (*Danaus plexippus*)—Proposed Threatened
- Slackwater darter (*Etheostoma boschungii*)—Threatened
- Pink mucket (*Lampsilis abrupta*)—Endangered
- Spectaclecase and Proposed Critical Habitat (*Cumberlandia monodonta*)—Endangered
- Tennessee pigtoe (*Pleurobema batesianum*)—Proposed Endangered
- Anthony's riversnail (*Atheurina anthoni*)—Endangered
- Armored snail (*Marstonia pachyta*)—Endangered
- Slender campeloma (*Campeloma decampi*)—Endangered

Based upon a review of our records and the information provided in your letter, we concur with your determination that the project actions may affect but are not likely to adversely affect these federally listed species.

We also understand that NRC has determined this project will have no effect on the following federally listed species:

- Northern long-eared bat (*Myotis septentrionalis*)—Endangered
- Tricolored bat (*Perimyotis subflavus*)—Proposed Endangered
- Eastern hellbender (*Cryptobranchus alleganiensis alleganiensis*)—Proposed Endangered
- Spring pygmy sunfish (*Elassoma alabamiae*)—Threatened
- Birdwing pearl mussel (*Lemiox rimosus*)—Endangered
- Cracking pearl mussel (*Hemistena lata*)—Endangered
- Cumberlandian combshell (*Epioblasma brevidens*)—Endangered
- Dromedary pearl mussel (*Dromus dromas*)—Endangered
- Fluted kidneyshell (*Ptychobranhus subtentus*)—Endangered
- Orangefoot pimpleback (*Plethobasus cooperianus*)—Endangered
- Ring pink (*Obovaria retusa*)—Endangered
- Rough pigtoe (*Pleurobema plenum*)—Endangered
- Sheepnose (*Plethobasus cyphus*)—Endangered

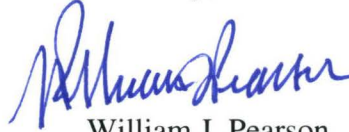
While the ESA gives federal action agencies the authority to make a no effect determination without additional concurrence from the Service, we certainly appreciate you notifying us of your decision.

Based upon the above information, no further endangered species consultation will be required for this portion of the project unless: 1) the identified action is subsequently modified in a manner that causes an effect on a listed species or on proposed or designated critical habitat; 2) new information reveals the identified action may affect federally protected species or designated critical habitat in a manner or to an extent not previously considered; or 3) a new species is listed

or a critical habitat is designated under the ESA that may be affected by the identified action.

If you have any questions or need additional information, please contact Ms. Erin Sasser of my staff at (251) 298-4226 or via email at erin_sasser@fws.gov for additional comments or discussions. Please refer to the reference number located at the top of this letter in future phone calls or written correspondence.

Sincerely,



William J. Pearson
Field Supervisor
Alabama Ecological Services Field Office