

Appendix I – Consultation History



1101 Market Street, Chattanooga, Tennessee 37402

Sent Via Electronic Submittal

March 5, 2026

Ms. Jane Yackley
(e-mail: Jane.Yackley@tn.gov)
Section Director
Waterborne and Zoonotic Disease,
Foodborne and Enteric Diseases,
Vector-borne Disease, Environmental
Health, and Environmental Epidemiology
Programs Communicable and
Environmental Diseases & Emergency
Preparedness
Tennessee Department of Health
Andrew Johnson Tower, 3rd floor
710 James Robertson Pkwy, Nashville, TN 37243

Dear Ms. Yackley:

TENNESSEE VALLEY AUTHORITY (TVA) – WATTS BAR NUCLEAR PLANT (WBN)
– LICENSE RENEWAL – REQUEST FOR RESPONSE REGARDING
THERMOPHILIC ORGANISMS

Tennessee Valley Authority (TVA) inquiring upon the Tennessee Department of Health (TDH) regarding thermophilic microorganisms in the receiving waters of the Watts Bar Nuclear Plant (WBN) cooling water discharge on the Chickamauga Reservoir, near Decatur, Tennessee. TVA will submit an application to the U.S. Nuclear Regulatory Commission (NRC) for the renewal of the operating licenses for WBN Units 1, and 2. The purpose of this letter is to consult the TDH on any known outbreaks due to the presence of thermophilic organisms in the vicinity of WBN.

NRC guidance regarding the license renewal process recommends applicants to consult with the state agency responsible for environmental health regarding concerns about the potential existence and concentration of thermophilic microorganisms associated with cooling towers and thermal discharges that can have negative impacts on human health. The two thermophilic microorganisms of particular concern due to their potential to cause fatalities are *Legionella* and *Naegleria fowleri* (*N. fowleri*) in the receiving waters for plant cooling discharge.

Regarding *Legionella* control, TVA conducts routine biocide treatments on condenser circulating water and cooling tower basins. At WBN, sodium hypochlorite is applied two to four times per week within permitted thresholds and is neutralized at the cooling tower outfalls using sodium bisulfate. These treatments, combined with WBN's adherence to strong industrial hygiene practices, reduce the potential for *Legionella* exposure.

Regarding *N. fowleri*, WBN operates under a National Pollutant Discharge Elimination System (NPDES) Permit No. TN0020168, issued by the Tennessee Department of Environment and Conservation (TDEC). The Clean Water Act's NPDES permit program sets technology based and water quality based effluent limitations on point source discharges. Requiring facilities to monitor and report parameters (like temperature, flow, and pollutant levels) at each outfall to ensure that discharges do not degrade receiving waters. These permits also impose specific thermal limits, derived through site-specific temperature modeling and criteria, to prevent discharge related warming in order to protect aquatic ecosystems from temperature-driven biological disruptions. WBN's permit limits the temperature of the heated effluent to a daily maximum temperature of 86.9°F.

TVA understands that *N. fowleri* is rarely found in water temperatures below 95°F and infections rarely occur at temperatures of 95°F or below. Increases in growth of *N. fowleri* occur when water temperatures range from 95°F to 106°F or higher. TVA does not anticipate any operational changes during the subsequent license renewal term that would impact our ability to comply with the existing permit limitations, and state water quality temperature limits.

Please detail any experience or concerns TDH may have regarding *Legionella*, *N. fowleri*, or other thermophilic microorganisms in the vicinity of WBN. TVA will include a copy of this letter and your response in the appropriate National Environmental Policy Act (NEPA) documentation relative to the WBN license renewal application.

If you have any questions concerning this matter, please contact Daniel Geren at dlgeren1@tva.gov.

Sincerely,



Susan Jacks
Senior Manager,
Water Permits, Compliance, and
Monitoring

Ms. Jane Yackley
Page 3
March 6, 2026

DLG:DDB
cc (electronic Distribution/ no enclosure):

Daniel L. Geren
Brad M. Love
Chelsa R. Souza
Joeseeph H. Bashore
Carol Freeman
Jennifer A. Myers
Zachary D. Buecker
ECM, ENVrecords

April 17, 2026

Ms. Susan Jacks
Senior Manager
Water Permits, Compliance, and Monitoring
Tennessee Valley Authority
1101 Market Street, Chattanooga, Tennessee 37402

Dear Ms. Susan Jacks,

This letter is regarding the request from the Tennessee Valley Authority for the Tennessee Department of Health's consultation regarding thermophilic organisms.

There have been no legionellosis outbreaks in Meigs County or Rhea County (the areas surrounding the plant and reservoir) in the last 12 months.

The Tennessee Department of Health recommends that the Watts Bar Nuclear Plant consults with a water management or remediation company that specializes in nuclear plants to review your biocide treatment protocols and to develop a pathogen concentration monitoring plan. Additionally, since both *Naegleria fowleri* and *Legionella* thrive in warm water, steps should be taken to not increase the natural water temperature of the Chickamauga Reservoir. This includes limiting the temperature of effluent and complying with the existing permit limitations and state water quality temperature limits.

***Legionella* Information**

There are several things to consider regarding *Legionella* risk in water sources. *Legionella* bacteria tend to grow and survive under the following conditions:

- Water between 77–113°F (25–45°C)
- Stagnant water
- Water or systems with insufficient disinfectant
- In biofilm created by the bacteria in pipes and on surfaces. Biofilm gives the bacteria protection and an environment to grow and spread.

People become sick when they breathe in water vapor that contains the bacteria. For this reason, cooling towers are high-risk devices as they release water vapor into the atmosphere. Cooling towers of river nuclear power plants also create favorable conditions for *Legionella* and *N. fowleri* growth in the surrounding water. Proper maintenance of cooling towers is essential to reducing *Legionella* presence. The following steps are recommended by the Centers for Disease Control and Prevention (CDC):

- **Clean and disinfect as directed:** Follow manufacturer recommendations
 - Prior to commissioning
 - Before startup
 - When idling
 - After shutdown

Perform an offline disinfection and cleaning at least annually.

- **Monitor water parameters** on a regular basis. Base measurement frequency on performance of the water management program or *Legionella* performance indicators for control. Adjust frequency according to the stability of performance indicator values. For example, increase the measurement frequency if there's a high degree of measurement variability.
- **Lower water temperature:** Operate cooling tower systems at the lowest possible water temperature. If possible, operate below the most favorable *Legionella* growth range (77–113°F, 25–45°C).
- **Use automation:** Automate anti-corrosion, anti-scale, and disinfectant addition and monitoring.
- **Avoid stagnation:** Flush low-flow pipe runs and dead legs at least weekly. Balance operating times among cooling towers when multiple cooling towers or cells exist.
- **Implement automated blowdown** (intentional discharge of system water and replacement with supply water) to maintain system water quality.
- **Consider filtration** to reduce the level of suspended solids in the cooling water. Base the decision on system factors like cooling tower location and particle load.
- **Monitor for water service disruptions** and develop plans to respond accordingly.
- **Maintain paperwork:** Keep site-specific log sheets, test procedures, service reports, and test results on site.
- **Consider testing for *Legionella*** in accordance with the CDC's routine testing module toolkit ([linked here](#))

Further information about controlling *Legionella* in cooling towers can be found here: [Controlling Legionella in Cooling Towers | Control Legionella | CDC](#)

***Naegleria fowleri* Information**

Naegleria fowleri is a free-living amoeba that lives in soil and warm freshwater lakes, rivers, ponds, and hot springs. Infection with this amoeba is very rare but nearly always fatal. People become sick when contaminated water enters the nose and travels to the brain. The amoeba thrives in warm water with an ideal temperature between 95–115°F (35–46°C), but it can persist under a wide variety of conditions and outside this temperature range. Further information about *N. fowleri* can be found here: [Naegleria fowleri Infections | Naegleria fowleri Infection | CDC](#)

Please let us know if you have any questions.

Sincerely,

Waterborne & Zoonotic Diseases Program

Communicable and Environmental Diseases & Emergency Preparedness (CEDEP)

Tennessee Department of Health

Waterborne.Health@tn.gov | 615-741-7247

Re: TVA_WBN_401-Waiver-Request_03022026_Final (EXT).pdf

From Eddie Gordon <Eddie.Gordon@tn.gov>

Date Wed 5/6/2026 4:09 PM

To Buecker, Zachary D <zdbuecker@tn.gov>; Battle, Dee <ddbattle0@tn.gov>; Water Permits <water.permits@tn.gov>

Cc Sarah Terpstra <Sarah.Terpstra@tn.gov>; Jacks, Susan R <srjacks@tn.gov>

 1 attachment (87 KB)

TN Waiver 401 TENNESSEE VALLEY AUTHORITY (TVA) – WATTS BAR NUCLEAR (WBN).pdf;

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the "Report Phishing" button located on the Outlook Toolbar at the top of your screen.

Zach,

I apologize for that. I had this wrote last month and never sent it I apologize for the delay.

Eddie Gordon | Environmental Program Manager
Division of Water Resources – Natural Resources Unit
(615)879-0563
eddie.gordon@tn.gov
tn.gov/environment

TDEC Staff often work remotely from home. Please schedule in-person visits, meetings, or discussions in advance.

From: Buecker, Zachary D <zdbuecker@tn.gov>
Sent: Wednesday, May 6, 2026 11:59 AM
To: Eddie Gordon <Eddie.Gordon@tn.gov>; Battle, Dee <ddbattle0@tn.gov>; Water Permits <Water.Permits@tn.gov>
Cc: Sarah Terpstra <Sarah.Terpstra@tn.gov>; Jacks, Susan R <srjacks@tn.gov>
Subject: [EXTERNAL] RE: TVA_WBN_401-Waiver-Request_03022026_Final (EXT).pdf

Hi Eddie,

I hope you are doing well. I wanted to follow up regarding the waiver letter and related documentation that was submitted for your review. Please let me know if there have been any updates or if additional information is needed on your end.

Thank you,
Zach

Zach Buecker, PWS, QHP
Specialist, Water Permits, Compliance, & Monitoring
Environment Compliance Operations



M. 443-243-9512 E. zdbuecker@tva.gov
1101 Market St. Chattanooga, TN 37402

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From: Buecker, Zachary D
Sent: Monday, March 9, 2026 9:50 AM
To: 'Eddie Gordon' <Eddie.Gordon@tn.gov>; Battle, Dee <ddbattle0@tva.gov>; Water Permits <water.permits@tn.gov>
Cc: Sarah Terpstra <Sarah.Terpstra@tn.gov>; Jacks, Susan R <srjacks@tva.gov>
Subject: RE: TVA_WBN_401-Waiver-Request_03022026_Final (EXT).pdf

Hi Eddie,

The letter sent by Dee included the ADEM Browns Ferry waiver letter which contains the language that was approved by the NRC. I've also attached it to this email for convenience.

Let me know if you need anything else.

Thanks!
-Zach

Zach Buecker, PWS, QHP
Specialist, Water Permits, Compliance, & Monitoring
Environment Compliance Operations



M. 443-243-9512 E. zdbuecker@tva.gov
1101 Market St. Chattanooga, TN 37402

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From: Eddie Gordon <Eddie.Gordon@tn.gov>
Sent: Monday, March 9, 2026 9:37 AM
To: Battle, Dee <ddbattle0@tva.gov>; Water Permits <water.permits@tn.gov>
Cc: Sarah Terpstra <Sarah.Terpstra@tn.gov>; Jacks, Susan R <srjacks@tva.gov>; Buecker, Zachary D

<zdbuecker@tva.gov>

Subject: RE: TVA_WBN_401-Waiver-Request_03022026_Final (EXT).pdf

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Dee,

In our last meeting, we discussed the wording used in the letter. I understand ADEM had significant issues with the Browns Ferry letter, and you mentioned you would share that letter with me so I can ensure our language is correct.

Thanks

Eddie Gordon
(615) 879-0563

From: Battle, Dee <ddbattle0@tva.gov>

Sent: Wednesday, March 4, 2026 10:29 AM

To: Eddie Gordon <Eddie.Gordon@tn.gov>; Water Permits <Water.Permits@tn.gov>

Cc: Sarah Terpstra <Sarah.Terpstra@tn.gov>; Jacks, Susan R <srjacks@tva.gov>; Buecker, Zachary D <zdbuecker@tva.gov>

Subject: [EXTERNAL] TVA_WBN_401-Waiver-Request_03022026_Final (EXT).pdf

Good morning,

Please see the following document for your records. If you have questions or need additional information, please contact Zach Buecker at (443) 243-9512 or by email at zdbuecker@tva.gov.

Thanks,

Dee Battle

Business Support Representative/Management Assistant
Waste – Permits, Compliance, & Monitoring
Environmental Compliance & Operations



W. N/A **M.** 423-838-1864 **E.** ddbattle0@tva.gov
1101 Market Street, Chattanooga, TN 37402

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STATE OF TENNESSEE
Department of Environment and Conservation
Division of Water Resources, Natural Resources Unit
Davy Crockett Tower, 9th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

May 6, 2026

Susan Jacks
Senior Manager
Tennessee Valley Authority
1101 Market Street, BR 2C
Chattanooga, Tennessee 37402

Subject: Tennessee Valley Authority (TVA)- Watts Bar Nuclear (WBN) Site

Dear Ms. Jacks:

TVA has requested that the Tennessee Department of Environment and Conservation (TDEC) waive its authority to act on Clean Water Act (CWA) Section 401 Water Quality Certification for WBN in Rhea County, Tennessee.

Any future actions impactful to regulated waters of the United States would remain under TDEC's 401 WQC purview for the federally issued Section 404 CWA permit. State-assumed oversight authorizing discharges under CWA Section 402 National Pollution Discharge Elimination System (NPDES) (permit #TN0020168) would ensure WBN meets state water quality criteria.

Because the WBN nuclear license renewal does not authorize direct impacts to regulated aquatic resources and TVA has committed to obtaining all necessary permits for future activities, the State of Tennessee hereby expressly waives its authority to act on the request for 401 WQC for the WBN nuclear license renewal.

This waiver does not replace or supersede requirements of other local, state, federal, or Tribal laws, nor eliminate the need to obtain Aquatic Resource Alteration Permits or other authorizations as required under The Tennessee Water Quality Control Act of 1977.

If you have any questions, please contact Eddie Gordon (615)879-0563 eddie.gordon@tn.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Eddie Gordon", is enclosed in a rectangular box.

Eddie Gordon, Environmental Program Manager
Natural Resources Unit
Division of Water Resources, TDEC

Project Review Form - TVA Bat Strategy (04/2025)

This form should **only** be completed if project includes activities in Tables 2 or 3 (STEP 2 below). This form is not required if project activities are limited to Table 1 (STEP 2) or otherwise determined to have no effect on federally listed bats. If so, include the following statement in your environmental compliance document (e.g., add as a comment in the project CEC): "Project activities limited to Bat Strategy Table 1 or otherwise determined to have no effect on federally listed bats. Bat Strategy Project Review Form NOT required." This form is to assist in determining required conservation measures per TVA's ESA Section 7 programmatic consultation for routine actions and federally listed bats.¹

Project Name: WATTS BAR NUCLEAR UNITS 1 AND 2 LICENSE RENEWAL

Date: 3/9/2026

Contact(s): Carol Freeman

CEC#: 2025-9

Project ID: 46371

Project Location (City, County, State): Rhea County, TN

Project Description:

The current NRC operating license for WBN Unit 1 will expire on February 7, 2036 and WBN Unit 2 on October 21, 2055. WBN's current baseload generation supports future forecasted baseload power needs, as outlined in the TVA's 2025 Integrated Resource Plan (IRP), by helping to maintain grid stability and generating capacity for TVA's generation portfolio mix. The purpose of the proposed action is to continue to generate baseload power at the WBN site for another 20 years per unit unit, between 2056 and 2075 respectively, through obtaining a license renewal from the Nuclear Regulatory Commission. Renewal of the current operating license would allow WBN Units 1 and 2 to continue supplying approximately 2,300 megawatts (MW) electric (MWe) of safe, clean, reliable, and cost-effective baseload generation for an additional 20 years beyond their current license terms.

SECTION 1: PROJECT INFORMATION - ACTION AND ACTIVITIES

STEP 1) Select TVA Action. If none are applicable, contact environmental support staff, Environmental Project Lead, or Terrestrial Zoologist to discuss whether form (i.e., application of Bat Programmatic Consultation) is appropriate for project:

1 Manage Biological Resources for Biodiversity and Public Use on TVA Reservoir Lands

6 Maintain Existing Electric Transmission Assets

2 Protect Cultural Resources on TVA-Retained Land

7 Convey Property associated with Electric Transmission

3 Manage Land Use and Disposal of TVA-Retained Land

8 Expand or Construct New Electric Transmission Assets

4 Manage Permitting under Section 26a of the TVA Act

9 Promote Economic Development

■ 5 Operate, Maintain, Retire, Expand, Construct Power Plants

10 Promote Mid-Scale Solar Generation

STEP 2) Select all activities from Tables 1, 2, and 3 below that are included in the proposed project.

TABLE 1. Activities with no effect to bats. Conservation measures & completion of bat strategy project review form NOT required.

1. Loans and/or grant awards	8. Sale of TVA property	19. Site-specific enhancements in streams and reservoirs for aquatic animals
2. Purchase of property	9. Lease of TVA property	20. Nesting platforms
3. Purchase of equipment for industrial facilities	10. Deed modification associated with TVA rights or TVA property	41. Minor water-based structures (this does not include boat docks, boat slips or piers)
4. Environmental education	11. Abandonment of TVA retained rights	42. Internal renovation or internal expansion of an existing facility
5. Transfer of ROW easement and/or ROW equipment	12. Sufferance agreement	43. Replacement or removal of TL poles
6. Property and/or equipment transfer	■ 13. Engineering or environmental planning or studies	44. Conductor and overhead ground wire installation and replacement
7. Easement on TVA property	14. Harbor limits delineation	49. Non-navigable houseboats

TABLE 2. Activities not likely to adversely affect bats with implementation of conservation measures. Conservation measures and completion of bat strategy project review form REQUIRED; review of bat records in proximity to project NOT required.

18. Erosion control, minor	57. Water intake - non-industrial	79. Swimming pools/associated equipment
24. Tree planting	58. Wastewater outfalls	81. Water intakes – industrial
30. Dredging and excavation; recessed harbor areas	59. Marine fueling facilities	84. On-site/off-site public utility relocation or construction or extension
39. Berm development	60. Commercial water-use facilities (e.g., marinas)	85. Playground equipment - land-based
40. Closed loop heat exchangers (heat pumps)	61. Septic fields	87. Aboveground storage tanks
45. Stream monitoring equipment - placement and use	66. Private, residential docks, piers, boathouses	88. Underground storage tanks
46. Floating boat slips within approved harbor limits	67. Siting of temporary office trailers	90. Pond closure
48. Laydown areas	68. Financing for speculative building construction	93. Standard License
50. Minor land based structures	72. Ferry landings/service operations	94. Special Use License
51. Signage installation	74. Recreational vehicle campsites	95. Recreation License
53. Mooring buoys or posts	75. Utility lines/light poles	96. Land Use Permit
56. Culverts	76. Concrete sidewalks	

Table 3: Activities that may adversely affect federally listed bats. Conservation measures AND completion of bat strategy project review form REQUIRED; review of bat records in proximity of project REQUIRED by OSAR/Heritage eMap reviewer or Terrestrial Zoologist.

15. Windshield and ground surveys for archaeological resources	34. Mechanical vegetation removal, includes trees or tree branches > 3 inches in diameter	69. Renovation of existing structures
16. Drilling	35. Stabilization (major erosion control)	70. Lock maintenance/ construction
17. Mechanical vegetation removal, does not include trees or branches > 3" in diameter (in Table 3 due to potential for woody burn piles)	36. Grading	71. Concrete dam modification
21. Herbicide use	37. Installation of soil improvements	73. Boat launching ramps
22. Grubbing	38. Drain installations for ponds	77. Construction or expansion of land-based buildings
23. Prescribed burns	47. Conduit installation	78. Wastewater treatment plants
25. Maintenance, improvement or construction of pedestrian or vehicular access corridors	52. Floating buildings	80. Barge fleeting areas
26. Maintenance/construction of access control measures	54. Maintenance of water control structures (dewatering units, spillways, levees)	82. Construction of dam/weirs/ levees
27. Restoration of sites following human use and abuse	55. Solar panels	83. Submarine pipeline, directional boring operations
28. Removal of debris (e.g., dump sites, hazardous material, unauthorized structures)	62. Blasting	86. Landfill construction
29. Acquisition and use of fill/borrow material	63. Foundation installation for transmission support	89. Structure demolition
31. Stream/wetland crossings	64. Installation of steel structure, overhead bus, equipment, etc.	91. Bridge replacement
32. Clean-up following storm damage	65. Pole and/or tower installation and/or extension	92. Return of archaeological remains to former burial sites
33. Removal of hazardous trees/tree branches		

STEP 3) Project includes one or more activities in Table 3?☐ YES (Go to Step 4)☒ NO (Go to Step 12)

Table 4. TVA's ESA Section 7 Programmatic Bat Consultation Required Conservation Measures

The Conservation Measures in Table 4 are automatically selected based on your choices in Tables 2 and 3 but can be manually overridden, if necessary. To Manually override, press the button and enter your name.

Check if Applies to Project	Activities Subject To Conservation Measure	Conservation Measure Description
☐	15, 16, 17, 18, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 45, 47, 48, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 90, 91, 92, 93, 94, 95, 96	NV1 - Noise will be short-term, transient, and not significantly different from urban interface or natural events (i.e., thunderstorms) that bats are frequently exposed to when present on the landscape.
☐	16, 25, 26, 37, 47, 52, 62, 63, 64, 65, 70, 71, 73, 78, 80, 82, 83, 86, 91	NV2 - Drilling, blasting, or any other activity that involves continuous noise (i.e., longer than 24 hours) disturbances greater than 75 decibels measured on the A scale (e.g., loud machinery) within a 0.5 mile radius of documented winter and/or summer roosts (caves, trees, unconventional roosts) will be conducted when bats are absent from roost sites.
☐	16, 26, 62	NV3 - Drilling or blasting within a 0.5 mile radius of documented cave (or unconventional) roosts will be conducted in a manner that will not compromise the structural integrity or alter the karst hydrology of the roost site.
☐	16, 26, 62	NV4 - Drilling or blasting within 0.5 miles of a documented roost site (cave, tree, unconventional roost) that needs to occur when bats are present will first involve development of project-specific avoidance or minimization measures in coordination with the USFWS.
☐	15, 26, 92	HP1 - Site-specific cases in which potential impact of human presence is heightened (e.g., conducting environmental or cultural surveys within a roost) will be closely coordinated with staff bat biologists to avoid/minimize impacts below any potential adverse effect. Any take from these activities would be covered by TVA's Section 10 permit.
☐	15, 26, 92	HP2 - Entry into roosts known to be occupied by federally listed bats will be communicated to the USFWS when impacts to bats may occur if not otherwise communicated (i.e., via annual monitoring reports per TVA's Section 10 permit). Any take from these activities would be covered by TVA's section 10 permit.
☐	23	SHF1 - Fire breaks will be used to define and limit burn scope.
☐	17, 23, 34	SHF2 - Site-specific conditions (e.g., acres burned, transport wind speed, mixing heights) will be considered to ensure smoke is limited and adequately dispersed away from caves so that smoke does not enter cave or cave-like structures.
☐	23	SHF3 - Acreage will be divided into smaller units to keep amount of smoke at any one time or location to a minimum and reduce risk for smoke to enter caves.
☐	17, 23, 34	SHF4 - If burns need to be conducted when there is some potential for bats to present on the landscape and more likely to enter torpor due to colder temperatures, burns will only be conducted if the air temperature is 55° or greater, and preferably 60° or greater.
☐	23	SHF5 - Fire breaks will be plowed immediately prior to burning, will be plowed as shallow as possible, and will be kept to minimum to minimize sediment.
☐	23	SHF6 - Tractor-constructed fire lines will be established greater than 200 feet from cave entrances . Existing logging roads and skid trails will be used where feasible to minimize ground disturbance and generation of loose sediment.
☐	17, 22, 23, 32, 33, 34, 35, 36	SHF7 - Burning will only occur if site specific conditions (e.g. acres burned, transport wind speed, mixing heights) can be modified to ensure that smoke is adequately dispersed away from caves or cave-like structures. This applies to prescribed burns and burn piles of woody vegetation.
☐	17, 22, 23, 32, 33, 34, 35, 36	SHF8 - Brush piles will be burned a minimum of 0.25 mile from documented, known, or obvious caves or cave entrances and otherwise in the center of newly established ROW when proximity to caves on private land is unknown.

Project Review Form - TVA Bat Strategy (04/2025)

	16, 17, 18, 21, 22, 24, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 38, 39, 48, 50, 51, 56, 61, 62, 63, 64, 65, 67, 69, 84, 89	SSPC1 (Transmission only) - Transmission actions and activities will continue to Implement A Guide for Environmental Protection and Best Management Practices for Tennessee Valley Authority Construction and Maintenance Activities. This focuses on control of sediment and pollutants, including herbicides. Following are key measures: ○ BMPs minimize erosion and prevent/control water pollution in accordance with state-specific construction storm water permits. BMPs are designed to keep soil in place and aid in reducing risk of other pollutants reaching surface waters, wetlands and ground water. BMPs will undertake the following principles: • Plan clearing, grading, and construction to minimize area and duration of soil exposure. • Maintain existing vegetation wherever and whenever possible. • Minimize disturbance of natural contours and drains. • As much as practicable, operate on dry soils when they are least susceptible to structural damage and erosion. • Limit vehicular and equipment traffic in disturbed areas. Keep equipment paths dispersed or designate single traffic flow paths with appropriate road BMPs to manage runoff. • Divert runoff away from disturbed areas. • Provide for dispersal of surface flow that carries sediment into undisturbed surface zones with high infiltration capacity and ground cover conditions. • Prepare drainage ways and outlets to handle concentrated/increased runoff. • Minimize length and steepness of slopes. Interrupt long slopes frequently. • Keep runoff velocities low and/or check flows. • Trap sediment on-site. • Inspect/maintain control measures regularly & after significant rain. • Re-vegetate and mulch disturbed areas as soon as practical. ○ Specific guidelines regarding sensitive resources and buffer zones: • Extra precaution (wider buffers) within SMZs is taken to protect stream banks and water quality for streams, springs, sinkholes, and surrounding habitat. • BMPs are implemented to protect and enhance wetlands. Select use of equipment and seasonal clearing is conducted when needed for rare plants; construction activities are restricted in areas with identified rare plants. • Standard requirements exist to avoid adverse impacts to caves, protected animals, unique/ important habitat (e.g., cave buffers, restricted herbicide use, seasonal clearing of suitable habitat).
	16, 17, 18, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 48, 50, 51, 52, 53, 54, 55, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 70, 71, 73, 76, 77, 78, 80, 81, 82, 83, 86, 87, 88, 89, 90	SSPC2 - Operations involving chemical/fuel storage or resupply and vehicle servicing will be handled outside of riparian zones (streamside management zones) in a manner to prevent these items from reaching a watercourse. Earthen berms or other effective means are installed to protect stream channel from direct surface runoff. Servicing will be done with care to avoid leakage, spillage, and subsequent stream, wetland, or ground water contamination. Oil waste, filters, other litter will be collected and disposed of properly. Equipment servicing and chemical/fuel storage will be limited to locations greater than 300-ft from sinkholes, fissures, or areas draining into known sinkholes, fissures, or other karst features.

Project Review Form - TVA Bat Strategy (04/2025)

	16, 17, 18, 21, 22, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 48, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 61, 62, 63, 64, 65, 66, 67, 69, 70, 71, 73, 76, 77, 80, 81, 82, 83, 84, 86, 87, 88, 89, 90, 91	SSPC3 (Power Plants only) - Power Plant actions and activities will continue to implement standard environmental practices. These include: ○ Best Management Practices (BMPs) in accordance with regulations: • Ensure proper disposal of waste, ex: used rags, used oil, empty containers, general trash, dependent on plant policy • Maintain every site with well-equipped spill response kits, included in some heavy equipment • Conduct Quarterly Internal Environmental Field Assessments at each sight • Every project must have an approved work package that contains an environmental checklist that is approved by sight Environmental Health & Safety consultant. • When refueling, vehicle is positioned as close to pump as possible to prevent drips, and overfilling of tank. Hose and nozzle are held in a vertical position to prevent spillage ○ Construction Site Protection Methods • Sediment basin for runoff - used to trap sediments and temporarily detain runoff on larger construction sites • Storm drain protection device • Check dam to help slow down silt flow • Silt fencing to reduce sediment movement ○ Storm Water Pollution Prevention (SWPP) Pollution Control Strategies • Minimize storm water contact with disturbed soils at construction site • Protect disturbed soil areas from erosion • Minimize sediment in storm water before discharge • Prevent storm water contact with other pollutants • Construction sites also may be required to have a storm water permit, depending on size of land disturbance (>1ac) ○ Every site has a Spill Prevention and Control Countermeasures (SPCC) Plan and requires training. Several hundred pieces of equipment often managed at the same time on power generation properties. Goal is to • Minimize fuel and chemical use Ensure proper disposal of waste, ex: used rags, used oil, empty containers, general trash, dependent on plant policy • Maintain every site with well-equipped spill response kits, included in some heavy equipment • Conduct Quarterly Internal Environmental Field Assessments at each sight • Every project must have an approved work package that contains an environmental checklist that is approved by sight Environmental Health & Safety consultant. • When refueling, vehicle is positioned as close to pump as possible to prevent drips, and overfilling of tank. Hose and nozzle are held in a vertical position to prevent spillage ○ Construction Site Protection Methods • Sediment basin for runoff - used to trap sediments and temporarily detain runoff on larger construction sites • Storm drain protection device • Check dam to help slow down silt flow • Silt fencing to reduce sediment movement ○ Storm Water Pollution Prevention (SWPP) Pollution Control Strategies • Minimize storm water contact with disturbed soils at construction site • Protect disturbed soil areas from erosion • Minimize sediment in storm water before discharge • Prevent storm water contact with other pollutants • Construction sites also may be required to have a storm water permit, depending on size of land disturbance (>1ac) ○ Every site has a Spill Prevention and Control Countermeasures (SPCC) Plan and requires training. Several hundred pieces of equipment often managed at the same time on power generation properties. Goal is to minimize fuel and chemical use
	17, 22, 32, 33, 34, 35, 36	SSPC4 (Transmission only) - Woody vegetation burn piles associated with transmission construction will be placed in the center of newly established ROWs to minimize wash into any nearby undocumented caves that might be on adjacent private property and thus outside the scope of field survey for confirmation. Brush piles will be burned a minimum of 0.25 miles from documented caves and otherwise in the center of newly established ROW when proximity to caves on private land is unknown.

Project Review Form - TVA Bat Strategy (04/2025)

	17, 18, 21, 22, 24, 25, 26, 30, 31, 33, 34, 35, 36, 40, 46, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 66, 67, 68, 69, 70, 72, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 87, 88, 91, 93, 95, 96	SSPC5 (26a, Solar, Economic Development only) - Section 26a permits and contracts associated with solar projects, economic development projects or land use projects include standards and conditions that include standard BMPs for sediment and contaminants as well as measures to avoid or minimize impacts to sensitive species or other resources consistent with applicable laws and Executive Orders.
	21, 54	SSPC6 - Herbicide use will be avoided within 200 ft of portals associated with caves, cave collapse areas, mines and sinkholes are capable of supporting cave-associated species. Herbicides are not applied to surface water or wetlands unless specifically labeled for aquatic use. Filter and buffer strips will conform at least to federal and state regulations and label requirements.
	17, 21, 25, 26, 27, 28, 29, 31, 32, 33, 34, 35, 36, 37, 38, 54, 55	SSPC7 - Clearing of vegetation within a 200-ft radius of documented caves will be limited to hand or small machinery clearing only (e.g., chainsaws, bush-hog, mowers). This will protect potential recharge areas of cave streams and other karst features that are connected hydrologically to caves.
	16, 26, 36, 37, 38, 39, 48, 50, 52, 59, 60, 62, 66, 67, 69, 72, 75, 77, 78, 79, 86	L1 - Direct temporary lighting away from suitable habitat during the active season.
	16, 26, 36, 37, 38, 39, 48, 50, 52, 59, 60, 62, 66, 67, 69, 72, 75, 77, 78, 79, 86	L2 - Evaluate the use of outdoor lighting during the active season and seek to minimize light pollution when installing new or replacing existing permanent lights by angling lights downward or via other light minimization measures (e.g., dimming, directed lighting, motion-sensitive lighting).

¹Bats addressed in consultation (04/2018) and updates (05/2023 and 10/2024), which includes gray bat (listed in 1976), Indiana bat (listed in 1967), northern long-eared bat (listed in 2015), tricolored bat (anticipated listing in the future), and Virginia big-eared bat (listed in 1979).

NOTES (additional info from field review, explanation of no impact or removal of conservation measures).

STEP 13) Save completed form (Click File/Save As, name form as "ProjectLead_BatForm_CEC-or-ProjectIDNo_Date") in project environmental documentation (e.g. CEC, Appendix to EA) AND send a copy of form to batstrategy@tva.gov
Submission of this form indicates that Project Lead/Applicant:

Carol Freeman (name) is (or will be made) aware of the requirements below.

- Implementation of conservation measures identified in Table 4 is required to comply with TVA's Endangered Species Act programmatic bat consultation.
- TVA may conduct post-project monitoring to determine if conservation measures were effective in minimizing or avoiding impacts to federally listed bats.

For Use by Terrestrial Zoologist Only

For projects that require use of Take and/or contribution to TVA's Bat Conservation Fund, Terrestrial Zoologist acknowledges that Project Lead/Contact has been informed that project will result in use of Incidental Take ☐ ac ☐ trees and that use of Take will require \$ contribution to TVA's Conservation Fund upon completion of activity (amount entered should be \$0 if cleared in winter).

Terrestrial Zoologist acknowledges that Project Lead/Contact (name) has been informed of any relevant conservation measures and/or provided a copy of this form.

Terrestrial Zoologist Acknowledgment. Finalize and Print to Non-Editable PDF

Appendix J – Socioeconomics

Table J-1. Population within 50 Miles of WBN

County Name	Total Population, 2024	Population Change, 2014-2024 (%)	Number of WBN Residents
Anderson County, TN	79,153	5.1	7
Bledsoe County, TN	15,032	13.5	12
Blount County, TN	139,333	12.0	5
Bradley County, TN	111,065	10.0	56
Campbell County, TN	39,761	-1.5	1
Catoosa County, GA	68,634	5.6	11
Cherokee County, NC	29,562	8.9	2
Cumberland County, TN	63,553	11.4	42
Fannin County, GA	25,742	8.9	1
Fentress County, TN	19,309	7.7	1
Graham County, NC	8,072	-7.7	0
Grundy County, TN	13,819	1.8	2
Hamilton County, TN	376,192	9.1	185
Knox County, TN	494,148	12.1	54
Loudon County, TN	58,580	17.8	0
Marion County, TN	29,250	3.5	19
McMinn County, TN	54,884	4.7	77
Meigs County, TN	13,343	14.1	73
Monroe County, TN	47,695	6.0	51
Morgan County, TN	21,361	-2.3	2
Murray County, GA	40,562	2.9	1
Overton County, TN	23,065	4.5	0
Polk County, TN	17,898	7.1	15
Putnam County, TN	82,558	12.9	2
Rhea County, TN	33,992	5.3	342
Roane County, TN	55,208	3.4	51
Scott County, TN	22,113	0.04	0
Sequatchie County, TN	16,809	16.5	12
Swain County, NC	14,013	-0.4	0
Van Buren County, TN	6,437	15.4	0
Warren County, TN	42,166	5.8	1
White County, TN	28,160	8.0	1
Whitfield County, GA	103,598	0.5	5

Note: The cells highlighted blue identify counties that are part of the four-county demographic ROI.

Sources: (USCB 2014) (USCB 2024b)

Table J-2. Minority and Low-Income Populations within 50 Miles of WBN

County Name	Minority Population (%)	Low-Income Population (%)
Anderson County, TN	13.6	13.4
Bledsoe County, TN	13.5	20.7
Blount County, TN	11.5	8.4
Bradley County, TN	18.8	12.7
Campbell County, TN	4.3	18.5
Catoosa County, GA	12.2	9.9
Cherokee County, NC	10.7	12.4
Cumberland County, TN	7.2	14.4
Fannin County, GA	8.2	13.7
Fentress County, TN	6.0	21.0
Graham County, NC	15.1	6.7
Grundy County, TN	6.2	18.9
Hamilton County, TN	31.7	13.1
Knox County, TN	20.9	12.2
Loudon County, TN	14.8	12.6
Marion County, TN	10.0	16.3
McMinn County, TN	14.2	13.0
Meigs County, TN	10.8	14.3
Monroe County, TN	13.1	15.5
Morgan County, TN	8.6	15.1
Murray County, GA	20.4	14.4
Overton County, TN	5.8	16.3
Polk County, TN	10.9	13.9
Putnam County, TN	15.0	18.4
Rhea County, TN	12.8	15.9
Roane County, TN	9.7	12.0
Scott County, TN	3.6	23.1
Sequatchie County, TN	9.9	21.9
Swain County, NC	40.8	19.1
Van Buren County, TN	5.4	16.1
Warren County, TN	16.7	15.7
White County, TN	8.1	13.2
Whitfield County, GA	44.5	14.8

Note: The cells highlighted blue identify counties that are part of the four-county demographic ROI.

Sources: (USCB 2024b) (USCB 2024c)

Table J-3. Demographic Characteristics of the Seven-County ROI

Demographic Characteristic	Hamilton County	Knox County	Loudon County	McMinn County	Meigs County	Rhea County	Roane County
Race (%)							
White	70.2	80.1	87.2	87.7	89.2	87.9	91.1
Black or African American	17.0	8.1	1.3	3.2	2.2	1.5	2.6
American Indian and Alaska Native	0.3	0.2	0.1	0.0	0.1	0.1	0.3
Asian	2.1	2.3	0.9	0.8	0.4	0.7	0.7
Native Hawaiian and Other Pacific Islander	0.0	0.1	0.0	0.0	0.0	0.0	0.0
Some Other Race	3.0	2.0	1.4	1.1	0.5	2.4	0.5
Two or More Races	7.3	7.3	9.1	7.1	7.6	1.4	4.9
Ethnicity (%)							
Hispanic or Latino (of any race)	8.0	6.3	10.4	4.6	1.9	6.3	2.5
Total Minority Population (%)							
Total Minority Population (including Hispanic or Latino ethnicity)	31.7	20.9	14.8	14.2	10.8	12.8	9.7

Notes: Totals in this table may not equal 100% as the total minority population includes people of any race (including White) with a Hispanic or Latino ethnicity.

Source: (USCB 2024b)

Table J-4. Selected Employment and Income Characteristics of the ROI

Characteristic	Hamilton County	Knox County	Loudon County	McMinn County	Meigs County	Rhea County	Roane County
Labor and Income							
Labor Force, 16 Years and Older (%)	64.1	65.0	54.9	56.2	50.8	52.7	54.3
Unemployment Rate (%)	4.4	3.5	2.8	4.9	5.5	5.8	4.9
Median Household Income (\$)	76,183	74,222	84,185	61,470	61,375	55,033	71,885
Per Capita Income (\$)	45,341	43,351	44,316	32,494	31,614	30,273	39,403
Employment Industry (%)							
Agriculture, Forestry, Fishing, Hunting, and Mining	0.5	0.3	2.9	1.1	1.1	2.4	0.9
Construction	6.8	7.2	7.7	5.8	10.4	5.8	8.8
Manufacturing	13.3	8.3	14.6	26.4	25.2	30.1	10.4
Wholesale Trade	2.0	2.3	2.1	1.8	2.9	1.2	2.3
Retail Trade	10.4	12.2	13.7	12.9	7.0	10.7	11.0
Transportation and Warehousing, and Utilities	7.8	5.0	7.8	7.2	5.9	8.1	6.9
Information	1.4	2.1	1.3	0.5	0.5	0.5	1.4
Finance and Insurance, and Real Estate	8.6	7.1	5.6	4.2	6.4	4.5	4.3
Professional, Scientific, and Management, and Administrative and Waste Management Services	10.4	13.2	11.5	6.2	9.2	5.8	15.0
Educational Services, and Health Care and Social Assistance	22.2	24.7	17.6	17.7	17.0	14.9	20.1
Arts, Entertainment, Recreation, Accommodation, and Food Services	9.0	9.7	6.4	6.9	7.0	6.3	6.7
Other Services, except Public Administration	4.7	5.0	5.1	6.6	5.1	6.2	5.4
Public Administration	2.9	3.0	3.8	2.9	2.4	3.4	6.8

Source: (USCB 2024d)

Table J-5. Migrant and Temporary Farm Workers in the Seven-County ROI

Item	Hamilton County	Knox County	Loudon County	McMinn County	Meigs County	Rhea County	Roane County
Number of Farms with Hired Labor	79	160	120	162	43	69	94
Number of Farms Hiring Workers for Less than 150 Days	47	129	80	130	33	60	60
Number of Farm Workers Working for Less than 150 Days	104	297	580	258	N/A	107	121
Total Migrant Workers	10	22	N/A	17	0	N/A	7

Source: (USDA 2022a)

Table J-6. Selected Housing Characteristics of the ROI

Housing Characteristic	Hamilton County	Knox County	Loudon County	McMinn County	Meigs County	Rhea County	Roane County
Total Housing Units	168,013	218,661	26,043	24,137	6,275	15,451	25,680
Occupied Units	154,181	201,146	24,056	21,218	5,235	13,475	22,790
Owner-occupied	98,531	131,117	19,311	16,078	4,238	9,632	17,801
Renter-occupied	55,650	70,029	4,745	5,140	997	3,843	4,989
Vacant Units (#)	13,832	17,515	1,987	2,919	1,040	1,976	2,890
Vacant Units (%)	8.2%	8.0%	7.6%	12.1%	16.6%	12.8%	11.3%
Median Value of Owner-occupied Housing	\$312,800	\$320,900	\$348,000	\$211,800	\$180,000	\$206,000	\$232,900

Source: (USCB 2024e)

Appendix K – Other Tables and Relevant Information

Tables

Table K-1. Chemical contents in buildings or containers on WBN Site

Building or Location	Container	Contents	Volumes (gal)
Auxiliary Building	FLEX 480v diesel generator	Diesel fuel	2 x 185
Boric Acid Mixing Building	RQ Chemical Tote	Boric Acid (7,000 ppm)	2 x 10,000
Crawler Building	Crawler	Hydraulic oil	380
Diesel Generator Buildings	1-day tanks	Diesel fuel	10 x 550
	7-day tanks (completely buried tanks)	Diesel fuel	5 x 68000
Emergency Diesel Generator Building	1-day tank	Diesel fuel	50
	Completely buried tank	Diesel fuel	1,500
Flexible Equipment Building	Dominator Pumps	Diesel fuel	3 x 300
	Tanks	Diesel fuel	4 x 175
	Double Walled Fuel Oil Tanks	Fuel Oil	2 x 2900
	Double Walled Fuel Oil Tanks mounted on trucks	Fuel Oil	2 x 500
	FLEX 6900v diesel generator	Fuel Oil	2 x 2,900
	Diesel Generator Tanks	Lube oil	2 x 103
High Pressure Fire Protection Pump House (west of U1 Cooling Tower)	Triton Pumps	Fuel Oil	3 x 150
	Tank	Diesel fuel	460
Intake Pumping Station 16	Crane hydraulic oil sump	Hydraulic oil	100
	RQ Chemical Tank	Hypochlorite	6000
MIC Building	RQ Chemical (Flogard) Tote	Quaternary Amine	1 x 300
Make-Up DI Building (MUDI)	RQ Chemical Drums	Citric Acid (50%)	4 x 55
	RQ Chemical Drums	Hypersperse MDC	0 - 10
	RQ Chemical Totes	Hydrazine	3 x 340
	RQ Chemical Totes	Hypochlorite	3 x 55
	RQ Chemical Drums	Sodium Bisulfite	0 - 10
Node Building	Diesel Generator Tank	Diesel fuel	625
Next to U1 Receiving	Diesel Generator Tank	Diesel fuel	300
Next to MODS (TSOB)	Diesel Generator Tank	Diesel fuel	1,125
Spring City Lift Station	RQ Chemical Tote	Ferric Sulfate (50%)	330
Turbine Building	Operating equipment	Lube oil	100 - 15,000
		EHC fluid	2 x 200
	RQ Chemical Tanks	Hydrazine (35%)	2 x 330
	RQ Chemical Metal Tote	Mono Ethanol Amine (ETA)	2,500
	RQ Chemical PolyTank		
Warehouse E	RQ Chemical Drums	Hydrazine	0-7
NE Corner Switchyard	Security Diesel Generator, Completely buried tank	Diesel fuel	1,500
500-kV Switchyard	Insulating oil storage tanks	Insulating oil	3 x 37,000

Table K-2. Refrigerant Leaked or Released (in lbs) for WBN Site, by Year

Refrigerant Type	2022	2023	2024	2025
R-22	180	40	355	75
R-507	---	25	---	---

Appendix L – Public and Agency Comments and TVA’s Response to Comments

Public and Agency Comments on the Draft Environmental Impact Statement and TVA's Response to Comments

A draft of the SEA was released for public review and comment on May 29, 2026. The availability of the Draft SEA and request for comments was announced in The Herald News, that serves the Rhea County area, and was posted on TVA's website. TVA's agency involvement included notification of the availability of the Draft SEA to local, state, and federal agencies and federally recognized tribes. Comments were accepted through June 30, 2026, via TVA's website, mail, and e-mail.

TVA received two comment submissions, one comment letter from a member of the public submitted via TVA's website and one comment letter from the Tennessee Department of Environment and Conservation (TDEC). TVA carefully reviewed the eight distinct comments received in these comment letters. Substantive comments raised during the comment period are summarized below along with TVA's responses to each comment. Non-substantive or out-of-scope comments not specific to the NEPA analysis were not addressed in the Final SEA. A copy of each of the comment letters is included at the end of this appendix.

Comment 1: TDEC strongly recommends that any wastes associated with construction be confined to the limits of the proposed project — construction may include but is not limited to the following: unforeseen damages and repairs, cleanup, grading, excavation, testing of subsurface conditions, confining sediment, surface stabilization, leaks, and spills. Wastes must be handled in accordance with the Solid and Hazardous Waste Rules and Regulations of the state. This includes all materials that would be classified as solid and/or hazardous wastes per these chapters.

With respect to the possibility of a legacy solid waste site, Tennessee's Solid Waste Management program only dates back to 1972, so there could conceivably be disposal in this area that predates the program of which no information is available. Any wastes that may be uncovered during this project would be subject to a hazardous waste determination and must be managed appropriately. (*Commenter: TDEC Division of Land Protection – Waste Management Branch*)

Reviews were conducted in internal state and federal databases (WasteBin, ECHO/NEPAssist, respectively) with respect to the delineated project site. No impact from any nearby facilities (USACE – Watts Bar, and TVA facilities) is anticipated by the proposed action.

Comment 2: TVA Watts Bar is critical to meet baseload power demand and grid stability... The WBN Units provide critical baseload power to the TVA system 24/7/365 and are essential to meeting a baseload power demand that does not waiver year-round. Not only is baseload power critical to maintaining and meeting the constant demand on the TVA grid, it is also critical to maintaining the frequency required to provide stability to the TVA transmission and distribution grid itself. As modern grid architecture and power supply evolves with more distributed resources such as renewable generation, battery storage, and microgrids, stable baseload generation becomes even more critical to grid stabilization. (*Commenter: TDEC Office of Energy Programs*)

Comment 3: Extending the operational life of TVA Watts Bar will help TVA meet rapidly increasing power demand...According to the North American Electric Reliability Corporation's recent Long-Term Reliability Assessment, meeting the growth in power demand is threatened by supply chain constraints, the interconnection process, and approval delays; thus, keeping the WBN Units operational beyond their current licensure will help mitigate against these vulnerabilities. (*Commenter: TDEC Office of Energy Programs*)

Comment 4: TVA Watts Bar fulfills TVA's obligation to providing affordable, reliable power to the Tennessee Valley and its customers... By extending the operational life of the WBN Units, TVA is ensuring Tennessee's energy security for the future and TVA's mission to provide safe, reliable, and affordable power to the Tennessee Valley and its customers. It is for these reasons, and others enumerated in the Draft SEA, that TDEC's Office of Energy Programs is supportive of this action.

TDEC appreciates the opportunity to provide comment on the Draft SEA. We encourage TVA to consider key regulatory considerations, ensure compliance with all applicable state and federal environmental laws, and address land-use impacts. Please note that these comments do not imply TDEC approval or disapproval of the proposed projects or activities. (*Commenter: TDEC Office of Energy Programs*)

Response 1-4: TVA reviewed the comments above. No changes have been made to the SEA.

Comment 5: Timing of Unit 2 License Renewal

Unit 2's current license does not expire until October 21, 2055, roughly 29 years from now. This timing sits well outside the NRC's stated practice, under which a licensee may apply for license renewal as early as 20 years before expiration of the current license... I understand the likely motivation is administrative efficiency, namely a single NEPA review and a combined site wide application covering both units. That efficiency rationale should be stated and justified on the record rather than assumed. Accordingly, I request that TVA address the following:

1. What specific technical, operational, regulatory, or financial necessity justifies evaluating Unit 2 renewal now, approximately 29 years before license expiration and well in advance of the NRC's 20-year early application norm, rather than addressing Unit 2 in a future review closer to its expiration?
2. How does TVA account for the uncertainty inherent in forecasting environmental conditions, grid demand, infrastructure, regulatory framework, and plant operating conditions several decades into the future, and how is that uncertainty reflected in a renewal decision made this far ahead of need?

(*Commenter: Anonymous*)

Response 5: Appendix M has been added to this SEA in response to this comment.

From: [Wufoo](#)
To: [nepa](#)
Subject: Watts Bar Nuclear Units 1 and 2 License Renewal [#2]
Date: Thursday, June 4, 2026 10:30:51 AM

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the “Report Phishing” button located on the Outlook Toolbar at the top of your screen.

Please provide your comments by uploading a file or by entering them below. *

Comment 1 – Timing of Unit 2 License Renewal

I understand the rationale for advancing the license renewal process for Watts Bar Unit 1, whose current operating license expires February 7, 2036 and which therefore falls within a conventional renewal planning horizon. I question, however, the basis for including Watts Bar Unit 2 in this action at this time. Unit 2's current license does not expire until October 21, 2055, roughly 29 years from now.

This timing sits well outside the NRC's stated practice, under which a licensee may apply for license renewal as early as 20 years before expiration of the current license. Unit 2 would remain outside that 20 year window even if the application were filed in the early 2030s to align with Unit 1's expiration. I recognize that the Draft SEA contemplates a decision on whether to submit a License Renewal Application rather than the renewal itself, and I understand the likely motivation is administrative efficiency, namely a single NEPA review and a combined site wide application covering both units. That efficiency rationale should be stated and justified on the record rather than assumed.

Accordingly, I request that TVA address the following:

1. What specific technical, operational, regulatory, or financial necessity justifies evaluating Unit 2 renewal now, approximately 29 years before license expiration and well in advance of the NRC's 20 year early application norm, rather than addressing Unit 2 in a future review closer to its expiration?
2. How does TVA account for the uncertainty inherent in forecasting environmental conditions, grid demand, infrastructure, regulatory framework, and plant operating conditions several decades into the future, and how is that uncertainty reflected in a renewal decision made this far ahead of need?

Comment 2 – Tritium Production and Ratepayer Cost Recovery

Watts Bar irradiates tritium producing burnable absorber rods (TPBARs) to supply tritium to DOE for national security purposes, and Watts Bar is currently the only commercial reactor site licensed and producing tritium for that mission. I understand that this work is conducted under an interagency agreement executed under the Economy Act (31 U.S.C. 1535), and that DOE/NNSA pays TVA an irradiation fee per rod and is intended to reimburse TVA for associated expenses and lost generation. My concern is not that no offset mechanism exists, but whether that mechanism fully and verifiably protects ratepayers.

I request that TVA address the following:

1. Does the current interagency agreement fully reimburse all costs attributable to tritium

production, including lost generation, accelerated component wear, and any lifecycle or opportunity costs, and is TVA's cost identification and invoicing adequate to verify that full recovery? This question is prompted directly by the prior TVA Office of the Inspector General audit of the program, which was unable to determine whether tritium production costs were accurately identified and invoiced or whether operational impacts were reimbursed, owing to inadequate documentation. Please describe what has changed since that finding.

2. Because any DOE reimbursement and fee revenue flows into TVA's general power system finances rather than as a direct offset to consumers, how does TVA quantify the net effect of the tritium mission on retail power rates, and can TVA demonstrate that the arrangement is at minimum rate neutral to its customers?

If TVA cannot demonstrate full and documented cost recovery, please explain why it is appropriate for ratepayers to bear any residual operational, lifecycle, or opportunity cost of a federal defense mission without a corresponding consumer benefit.

From: [Emma Bartolo](#)
To: [nepa](#)
Subject: Watts Bar Nuclear Units 1 & 2 License Renewal SEA, TDEC Comments
Date: Tuesday, June 30, 2026 3:51:33 PM
Attachments: [Outlook-yxvnt3e.png](#)
[Final TDEC Comments TVA Watts Bar Nuclear Units 1&2 License Renewal.pdf](#)

This is an EXTERNAL EMAIL from outside TVA. THINK BEFORE you CLICK links or OPEN attachments. If suspicious, please click the “Report Phishing” button located on the Outlook Toolbar at the top of your screen.

Hello,

Please see the attached comment letter on behalf of the Tennessee Department of Environment and Conservation (TDEC) regarding TVA's Watts Bar Nuclear Units 1 & 2 License Renewal SEA. TDEC appreciates the opportunity to comment on the proposed project.

Please note that these comments are not indicative of approval or disapproval of the proposed projects or activities contained within. For any further questions or clarifications, please feel free to contact me at Emma.Bartolo@tn.gov.

Thank you,
Emma Bartolo

 **Department of
Environment &
Conservation**
Emma Bartolo | Policy Analyst
Office of Policy & Planning
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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

DAVID W. SALYERS, P.E.
COMMISSIONER

BILL LEE
GOVERNOR

June 30, 2026

Via Electronic Mail to NEPA@tva.gov

Carol Freeman
NEPA Specialist
Environment & Stewardship
1101 Market Street
Chattanooga, TN 37402

Dear Tennessee Valley Authority:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Tennessee Valley Authority's (TVA) Draft Supplemental Environmental Assessment (SEA) for Watts Bar Nuclear Units 1 and 2 (WBN Units) License Renewal. The proposed action entails TVA submitting a License Renewal Application to the U.S. Nuclear Regulatory Commission to renew the operating licenses of WBN Units 1 and 2 for an additional 20 years beyond their current license expiration dates. The extension would allow TVA to continue meeting long-term system generation needs while also supporting the Department of Energy's ongoing tritium production needs.

TDEC is the environmental and natural resource regulatory agency in Tennessee with delegated responsibility from the U.S. Environmental Protection Agency to regulate sources of air pollution; solid and hazardous waste; underground storage tanks; and water resources. TDEC has reviewed the Draft SEA and offers the following comments regarding the proposed project:

Division of Land Protection — Waste Management Branch

TDEC strongly recommends that any wastes associated with construction be confined to the limits of the proposed project — construction may include but is not limited to the following: unforeseen damages and repairs, cleanup, grading, excavation, testing of subsurface conditions, confining sediment, surface stabilization, leaks, and spills. Wastes must be handled in accordance with the Solid and Hazardous Waste Rules and Regulations of the state. This includes all materials that would be classified as solid and/or hazardous wastes per these chapters.

With respect to the possibility of a legacy solid waste site, Tennessee's Solid Waste Management program only dates back to 1972, so there could conceivably be disposal in this area that predates the program of which no information is available. Any wastes that may be uncovered during this project would be subject to a hazardous waste determination and must be managed appropriately.

Reviews were conducted in internal state and federal databases (WasteBin, ECHO/NEPAssist,



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respectively) with respect to the delineated project site. No impact from any nearby facilities (USACE – Watts Bar, and TVA facilities) is anticipated by the proposed action.

Office of Energy Programs

TVA Watts Bar is critical to meet baseload power demand and grid stability.

TVA Watts Bar currently consists of two Westinghouse pressurized water reactors and associated turbine generators that collectively supply approximately 2,300 MWe power to the TVA transmission and distribution system. Producing approximately 1,150 MW per unit, Watts Bar typically generates nearly 19,000 gigawatt hours per year, or enough to power 1.3 million homes. The WBN Units provide critical baseload power to the TVA system 24/7/365 and are essential to meeting a baseload power demand that does not waiver year-round. Not only is baseload power critical to maintaining and meeting the constant demand on the TVA grid, it is also critical to maintaining the frequency required to provide stability to the TVA transmission and distribution grid itself. As modern grid architecture and power supply evolves with more distributed resources such as renewable generation, battery storage, and microgrids, stable baseload generation becomes even more critical to grid stabilization.

Extending the operational life of TVA Watts Bar will help TVA meet rapidly increasing power demand.

While power demand in the United States remained relatively flat this century due to energy efficiencies and the Great Recession, power demand this decade has reached new heights due to multiple factors, including manufacturing electrification and onshoring, data and Artificial Intelligence centers, and electric vehicle and its support infrastructure. In June 2026, the U.S. Department of Energy's Lawrence Berkeley National Laboratory estimated that data center facilities could use up to roughly 11.8 percent of U.S. power by 2030, up from only 4.5 percent now. United States Data Center Energy Usage Report: 2025 Update. June 2026.

<https://escholarship.org/uc/item/33m6w3x0>. According to the North American Electric Reliability Corporation's recent Long-Term Reliability Assessment, meeting the growth in power demand is threatened by supply chain constraints, the interconnection process, and approval delays; thus, keeping the WBN Units operational beyond their current licensure will help mitigate against these vulnerabilities.

TVA Watts Bar fulfills TVA's obligation to providing affordable, reliable power to the Tennessee Valley and its customers.

Under Alternative A – the No Action Alternative, where TVA would not renew the operating licenses of the WBN Units, the units would be shut down at the end of their term, February 7, 2036, and October 21, 2055, respectively. In that scenario, TVA would need to replace the lost generation capacity (approximately 2,300 MW) with a portfolio of generating resources in line with their 2019 Integrated Resource Plan. Both the enormous capital expense of building another traditional nuclear plant like TVA Watts Bar. The length of time needed to scope and build such new nuclear units would be unlikely to match the loss of this generation asset. Similarly, the loss of this baseload generation would



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undermine grid stability.

By extending the operational life of the WBN Units, TVA is ensuring Tennessee's energy security for the future and TVA's mission to provide safe, reliable, and affordable power to the Tennessee Valley and its customers. It is for these reasons, and others enumerated in the Draft SEA, that TDEC's Office of Energy Programs is supportive of this action.

TDEC appreciates the opportunity to provide comment on the Draft SEA. We encourage TVA to consider key regulatory considerations, ensure compliance with all applicable state and federal environmental laws, and address land-use impacts. Please note that these comments do not imply TDEC approval or disapproval of the proposed projects or activities.

Please contact me should you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Emma Bartolo". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Emma Bartolo
Policy Analyst
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Appendix M – WBN Unit 2 License Renewal Timing Exemption from NRC

WBN Unit 2 License Renewal Timing Exemption from NRC

TVA identified the opportunity for an economic benefit to the organization and rate payers of significant cost savings by reviewing license renewal of Unit 2 in parallel with Unit 1. TVA requested a one-time exemption from NRC to the 20-year limit on applying for nuclear license renewals. NRC approved this exemption on December 29, 2025. The proposal to seek an early extension of the Unit 2 operating license would not change the manner in which the plant operates and would maintain public health and safety because no additional changes to the facility or site would be made as a result of the action.

The NRC exemption documentation (ADAMS ML25332A068) is provided here in Appendix M of this SEA.

As described in Section 1.2 of this SEA, WBN produces approximately 12 percent of TVA's total power supply. TVA is experiencing increasing demand for electricity driven by population, employment, and industrial growth (particularly from data centers), weather trends, and increasing electrification. The continued operation of WBN is a critical component to help TVA meet these increasing demands into the future. TVA would continue to maintain WBN as appropriate to ensure the plant can operate efficiently and safely throughout the period of extended operations. License renewal of WBN Unit 2 preserves the option to continue to operate. Uncertainties can be addressed in the future as appropriate when a decision is made whether to continue operations.

NUCLEAR REGULATORY COMMISSION

Docket No. 50-391

Tennessee Valley Authority;

Watts Bar Nuclear Plant, Unit 2;

Exemption

I. Background

The Tennessee Valley Authority (TVA) is the holder of Facility Operating License No. NPF-96 for Watts Bar Nuclear Plant (WBN), Unit 2. WBN, Unit 2, is collocated with WBN, Unit 1, in Spring City, Tennessee; however, this exemption is applicable only to WBN, Unit 2. The license provides, among other things, that the licensee is subject to all rules, regulations, and orders of the U.S. Nuclear Regulatory Commission (NRC, or the Commission) now or hereafter in effect. The NRC issued the initial operating license for WBN, Unit 2, on October 22, 2015. The current facility operating license for WBN, Unit 2, expires at midnight on October 21, 2055.

II. Request/Action

Part 54 of title 10 of the *Code of Federal Regulations* (10 CFR), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants," contains the requirements for the renewal of operating licenses for nuclear power plants. Under 10 CFR 54.17(c) an application for a renewed license may not be submitted to the Commission earlier than 20 years before the expiration of the operating license currently in effect.

TVA has informed the NRC that it plans to submit the WBN, Units 1 and 2, license renewal application (LRA) earlier than 20 years before expiration of the facility operating license for WBN, Unit 2. Based on the requirement in 10 CFR 54.17(c), an LRA for WBN, Unit 2, cannot be filed prior to October 21, 2035. As a result, by letter dated August 21, 2025 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML25233A135),

pursuant to 10 CFR 54.15 and 10 CFR 50.12, TVA requested a one-time exemption from the 10 CFR 54.17(c) schedular requirement.

III. Discussion

Under 10 CFR 54.15, exemptions from the requirements of part 54 are governed by regulations at 10 CFR 50.12. Pursuant to 10 CFR 50.12, the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of this part, which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. However, an exemption will not be granted unless special circumstances are present as defined in 10 CFR 50.12(a)(2). In its application, TVA states that special circumstances, as described in 10 CFR 50.12(a)(2)(ii), apply to its request, which states that special circumstances are present when “Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.”

A. The Exemption is Authorized by Law

The Commission’s basis for establishing the 20-year limit contained in 10 CFR 54.17(c) is discussed in the 1991 Statements of Consideration for 10 CFR Part 54 (56 FR 64963). The limit was established to ensure that substantial operating experience was accumulated by a licensee before a renewal application is submitted such that any plant-specific concerns regarding aging would be disclosed. In amending the rule in 1995, the Commission sought public comment on whether the 20-year limit should be reduced (60 FR 22461). Based on the nature of the comment responses received, the Commission did not generically reduce the 20-year limit at that time (60 FR 22488). However, the Commission indicated that it would consider plant-specific exemption requests by applicants who believe that sufficient information is available to justify applying for license renewal earlier than 20 years from expiration of the current license.

The current operating license for WBN, Unit 2, was issued in accordance with Section 103 of the Atomic Energy Act, as amended (AEA). Section 103 and 10 CFR 50.51 limit the duration for an operating license to a maximum of 40 years. In accordance with Section 54.31, the renewed license would be of the same class as the operating license currently in effect and cannot exceed a term of 40 years. Therefore, the renewed license for WBN, Unit 2, is limited both by law and by the Commission's regulations to 40 years.

Section 54.31(b) states that:

A renewed license will be issued for a fixed period of time, which is the sum of the additional amount of time beyond the expiration of the operating license (not to exceed 20 years) that is requested in a renewal application plus the remaining number of years on the operating license currently in effect. The term of any renewed license may not exceed 40 years.

In its request TVA stated that it does not at this time seek an exemption from any of the substantive requirements of 10 CFR Part 54 in connection with the preparation of the WBN, Units 1 and 2, license renewal application, and that it will satisfy the pertinent requirements of 10 CFR Part 54 when preparing and submitting the license renewal application.

Because of TVA's decision to apply early for license renewal for WBN, Unit 2, TVA may not obtain the maximum 20-year period of extended operation permitted by Section 54.31(b) because the term of the renewed license may not, by law, exceed 40 years. Any actual reduction will depend on the date the renewed license is issued.

The NRC staff has determined that granting the licensee's proposed exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemption is authorized by law.

B. The Exemption Presents No Undue Risk to Public Health and Safety

TVA is seeking an exemption from the requirements of 10 CFR 54.17(c) for schedular relief, which would only relieve TVA of the schedular requirement to wait until October 21, 2035, to submit an LRA for WBN, Unit 2. The action does not change the manner in which the plant operates and would maintain public health and safety, because no additional changes are made as a result of the action. TVA must still conduct all environmental reviews required by 10 CFR part 51 and all safety reviews and evaluations required by 10 CFR part 54 when preparing the LRA for WBN, Units 1 and 2.

Pending final action on the LRA, the NRC will continue to conduct all regulatory activities associated with licensing, inspection, and oversight, and will take whatever action may be necessary to ensure adequate protection of the public health and safety. This exemption does not affect the NRC's authority, applicable to all licenses, to modify, suspend, or revoke a license for cause, such as the identification of a serious safety concern. Therefore, the NRC finds that the action does not cause undue risk to public health and safety.

C. The Exemption is Consistent with the Common Defense and Security

As discussed previously, the requested exemption would only allow a schedular exemption. This exemption does not change any site security features, procedures, staffing, or other security-related matters. Therefore, the NRC finds that the action is consistent with common defense and security.

D. Special Circumstances

The regulation at 10 CFR 50.12(a)(2) lists special circumstances for which an exemption may be granted. Pursuant to the regulation, it is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. As noted above, TVA stated that the special circumstance that applies to this exemption request is found in 10 CFR 50.12(a)(2)(ii), which states, "Application of the regulation in the particular

circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule.”

In initially promulgating 10 CFR 54.17(c) in 1991, the Commission stated that the purpose of the 20-year time limit was “to ensure that substantial operating experience is accumulated by a licensee before it submits a renewal application,” such that any plant-specific concerns regarding aging would be disclosed (56 FR 64963). At that time, the Commission found that 20 years of operating experience provided a sufficient basis for LRAs. However, in issuing the amended Part 54 in 1995, the Commission indicated it would consider an exemption to this requirement if sufficient information was available on a plant-specific basis to justify submission of an application to renew a license before completion of 20 years of operation (60 FR 22488). TVA’s exemption request is consistent with the Commission’s intent to consider plant-specific requests and is permitted by 10 CFR 54.15.

The licensee stated that WBN, Unit 2, is the sister unit to WBN, Unit 1. Both units are four-loop pressurized-water reactors using ice condensers with nuclear steam supply systems provided by Westinghouse Electric Corporation (WEC). The two WBN units currently have a combined operating history of over 38 reactor-years. WBN Unit 1 and Unit 2 are of sufficiently similar design that the NRC issues reactor operator and senior reactor operator licenses that are common to both WBN, Units 1 and 2. TVA also stated because of the similarities between WBN, Units 1 and 2, personnel of the various plant organizations (e.g., Maintenance and Engineering) are typically assigned work activities on both units, and that these plant organizations are not divided into separate Unit 1 and Unit 2 groups. The operating experience for WBN, Unit 1, is directly applicable to WBN, Unit 2, since the two units are similar in design, operation (e.g., same licensed thermal power), maintenance, use of operating experience, and environment.

Since the rule was originally promulgated, there has been significant experience with reviewing renewal applications for large LWRs; the agency has reviewed over 50 applications for license renewal and 9 applications for subsequent license renewal.

According to TVA, the units share some common facilities that are within the scope of license renewal review and have many similar components and materials. WBN, Unit 2, is physically located adjacent to Unit 1. As such, the civil structures are subject to the same soil chemistry, atmospheric and meteorological conditions and climate. Internal environments for both units are also similar due to the similarity in plant design and operation. Additionally, many of the procedures that govern WBN site activities such as condition reporting and monitoring programs, are not unit specific and require the consideration of operating experience information obtained from several sources, including the WBN site, the TVA nuclear fleet, and the nuclear industry.

Given the similarities between the units' design and the environment in which they operate, the NRC staff finds that the operating experience at Unit 1 is applicable to Unit 2 for purposes of the license renewal review. The NRC staff has determined that sufficient combined operating experience exists to satisfy the intent of 10 CFR 54.17(c), and the application of the regulation in this case is not necessary to achieve the underlying purpose of the rule. Therefore, the NRC staff finds that TVA's request meets the special circumstance requirement in 10 CFR 50.12(a)(2)(ii).

E. Environmental Considerations

The NRC's approval of an exemption to scheduling requirements belongs to a category of actions that the NRC, by rule or regulation, has declared to be a categorical exclusion to environmental analysis, after first finding that the category of actions does not individually or cumulatively have a significant effect on the human environment. Specifically, the exemption is

categorically excluded from further analysis under 10 CFR 51.22(c)(25)(vi)(G), "Scheduling requirements."

Under 10 CFR 51.22(c)(25), the granting of exemption from the requirements of any regulation of chapter 10 is a categorical exclusion provided that (i) there is no significant hazards consideration; (ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) there is no significant increase in individual or cumulative public or occupational radiation exposure; (iv) there is no significant construction impact; (v) there is no significant increase in the potential for or consequences from radiological accidents; and (vi) the requirements from which an exemption if sought involve certain categories of requirements, including scheduling requirements. The basis for NRC's determination is provided in the following evaluation of the requirements in 10 CFR 51.22(c)(25)(i)-(vi).

Requirement in 10 CFR 51.22(c)(25)(i)

To qualify for a categorical exclusion under 10 CFR 51.22(c)(25)(i), the exemption must involve a no significant hazards consideration. The criteria for making a no significant hazards consideration determination are found in 10 CFR 50.92(c). The NRC staff has determined that granting the exemption request involves no significant hazards consideration because allowing a one-time exemption from the 10 CFR 54.17(c) schedular requirement does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Therefore, the requirement of 10 CFR 51.22(c)(25)(i) is met.

Requirements in 10 CFR 51.22(c)(25)(ii) and (iii)

The exemption constitutes a change to a schedular requirement which is administrative in nature and does not involve any change in the types or significant increase in the amounts of

any effluents that may be released offsite and does not contribute to any significant increase in individual or cumulative occupational or public radiation exposure. Therefore, the requirements of 10 CFR 51.22(c)(25)(ii) and (iii) are met.

Requirement in 10 CFR 51.22(c)(25)(iv)

The regulation from which the exemption is being sought is not associated with construction, and the exemption does not propose any changes to the facility or the site, does not alter the site, and does not change the operation of the site. Therefore, the requirement of 10 CFR 51.22(c)(25)(iv) is met because there is no significant construction impact.

Requirement in 10 CFR 51.22(c)(25)(v)

The exemption constitutes a change to a schedular requirement which is administrative in nature and does not impact the probability or consequences of accidents. Thus, there is no significant increase in the potential for, or consequences from, a radiological accident. Therefore, the requirement of 10 CFR 51.22(c)(25)(v) is met.

Requirements in 10 CFR 51.22(c)(25)(vi)

To qualify for a categorical exclusion under 10 CFR 51.22(c)(25)(vi), the exemption must involve at least one of the listed requirements. The requested exemption involves scheduling requirements per 10 CFR 51.22(c)(25)(vi)(G) in that it involves an exemption from scheduling requirement of 10 CFR 54.17(c) that would allow TVA to submit an LRA for WBN, Unit 2, earlier than 20 years before the expiration of its current license. Therefore, the requirement of 10 CFR 51.22(c)(25)(vi) is met.

Based on the above, the NRC staff concludes that the proposed exemption meets the eligibility criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(25). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the approval of this exemption request.

IV. Conclusion

The NRC has determined that, pursuant to 10 CFR 54.15 and 10 CFR 50.12, the exemption is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. Also, special circumstances, as defined in 10 CFR 50.12(a)(2), are present. Therefore, the NRC hereby grants the licensee a one-time exemption for WBN, Unit 2, from the requirements of 10 CFR 54.17(c), to allow the submittal of an LRA earlier than 20 years before the expiration of the WBN, Unit 2, license that is currently in effect.

The exemption is effective upon issuance.

Dated at Rockville, Maryland, this 29th day of December 2025

For the Nuclear Regulatory Commission.

AIDA RIVERA-
VARONA

Digitally signed by AIDA
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Date: 2025.12.29
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Aida Rivera-Varona, Director (Acting),
Division of Operating Reactor Licensing,
Office of Nuclear Reactor Regulation.