

# **APPENDIX F**

## **Responses to Public Comments on the Draft SEIS**

Comment ID 1

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 6.3

Comment We note that the NRC is not listed as a cooperating agency for the DSEIS. The FSEIS should discuss the relationship of this SEIS to NRC's review of the relicensing and if the NRC would need, for the purposes of NEPA, to adopt the SEIS for its licensing action. We note that the NRC typically prepares EISs for the relicensing of commercial (i.e., non-federal) nuclear plants. If NRC were a cooperating agency, its adoption of the EIS would be streamlined.

Response TVA agrees that NRC should be a cooperating agency on the SEIS under the regulations promulgated by the Council on Environmental Quality. *See* 40 C.F.R. § 1501.6. As noted in this comment, NRC routinely prepares EISs for the relicensing of non-federal nuclear plants, and NEPA does not distinguish between federal and private nuclear plants for purposes of review. NRC's predecessor, the Atomic Energy Commission cooperated on the original EIS that TVA prepared for the plant. Cooperating now would save paperwork and better integrate the environmental reviews of TVA and NRC. In the past, TVA has approached NRC about the desirability of cooperating on environmental reviews. However, NRC takes the position that cooperating with TVA, the licensee in this situation, could be perceived as potentially biasing its review processes and NRC has refused to do this.

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Comment ID 2

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 1.1

Comment EPA agrees with the TVA approach to include NEPA coverage in the DSEIS for the potential restart of Unit 1, even if this alternative (2) is not selected. Should Alternative 2 not be selected but becomes viable within a relatively short time frame (5 yrs), NEPA requirements for construction and operation would already be completed (as opposed to possible additional NEPA supplementation, assuming no substantive project/site modifications had occurred since the TVA Record of Decision (ROD) and if the ongoing NRC relicensing process could still be modified to include Unit 1 recovery and restart.

Response This comment does not require a response.

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Comment ID 3

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 1.1

Comment We also agree with the inclusion of the construction of dry cast [cask] spent fuel storage as a NEPA "connected action" to the relicensing. This is related to the fact that the size of the storage facility would differ if Unit 1 was restarted or not (even though additional storage capacity would be needed before the current NRC license would expire for Units 2 and 3) and dry cast storage would replace the current pool storage. Such onsite storage would not preclude use of a proposed permanent DOE storage site.

Response This comment does not require a response.

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Comment ID 4

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Sections 1.1 and 5.2.2

Comment The existing license (40 yrs) and the proposed relicensing (20 yrs) are long termed. Accordingly, the importance of a quality SEIS for license renewal and a thorough NEPA public review becomes magnified. However, it may be noted that other plant operational permits such as the National Pollutant Discharge Elimination Discharge (NPDES) administered by the State of Alabama with EPA oversight, are shorter termed (5 yrs) to allow for modifications in operation if needed. We also assume that all permits and licenses required for BFN can also be reopened for cause before term completion.

Response This comment does not require a response.

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Comment ID 5

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 1.5.2

Comment We agree that relevant analyses of the original 1972 TVA EIS need not be repeated in the present SEIS and can be incorporated by reference. However, given the age and probable lack of public availability of the original EIS, we recommend that the FSEIS provide brief summaries of incorporated analyses, findings and rationales wherever appropriate. Similarly, we also recommend that



Subalternatives for Alternative 2 involve various designs, additions or replacements of cooling towers since additional tower cooling and cooling water flow would be required for EPU and the restart of Unit 1. Three subalternatives are offered by TVA: 2A (addition of 2 new linear mechanical draft cooling towers similar to the existing 6, such that 8 towers would be available); 2B (addition of 2 cooling towers of different design from the existing towers, such that 8 towers would be available); and 2C (replacement of 4 of the existing original towers, retention of 1 replaced tower constructed after the original tower was burned down and construction of 5 new larger linear mechanical draft cooling towers, such that 6 larger towers would be available).

Response This comment does not require a response.

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Comment ID 8

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.8

Comment TVA currently prefers Alternative 2 (pg. 2-52) at the DSEIS stage. The recovery and restart of Unit 1 is being contemplated since TVA's cost analysis and benefits comparison indicates "...that recovering Unit 1 for extended operation (with license renewal) is financially viable" (pg. 2-51). TVA should provide a firm preferred alternative in the FSEIS and its selected alternative in the TVA ROD once a financial decision on the restart of Unit 1 is made.

Response Appropriate text in Section 2.8 has been changed.

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Comment ID 9

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.7 and 2.8

Comment Because of EPA's policy to maximize existing corridors and facilities unless there is environmental reason not to do so, EPA favors Alternative 2 over 1. In regard to the subalternatives for Alternative 2, we recommend that the TVA selection be based on design efficiency and the amount of additional waste heat load that would need to be dissipated in order to remain in NPDES permit compliance, given the uprating of all units and restart of Unit 1. We note that costs of each subalternative are similar (pg. 2-51). EPA offers no preference for the presented subalternatives as long as thermal discharges remain in compliance with the thermal limits of the NPDES operational permit, which is expected by TVA for all subalternatives. Generically, however, EPA prefers the most efficient design that best minimizes the level of thermal discharge and tower noise, drift, diesel emissions and public visibility. This includes removal and proper re-disposal of

existing spoil piles to the extent that they deflect wind flow needed for efficient functioning of the existing towers.

Response As explained in Sections 2.7 (Comparison of Costs Between Alternatives) and 2.8 (The Preferred Alternative), the preferred cooling tower capacity addition sub-alternative is Alternative 2D. Alternative 2D is to construct a single new linear 20 cell mechanical draft cooling tower which is 25 percent larger than the existing 16 cell cooling towers. The tower would utilize current technology thereby maximizing its thermal efficiency. TVA has performed analyses which demonstrate that the plant with this cooling tower configuration can operate with its thermal discharges remaining in compliance with the thermal limits of the NPDES operational permit. This alternative has been demonstrated to have the best financial advantage but yet still maintains the ability to operate the three units in an uprated condition.

This tower would reside on the location of a vacant cooling tower basin with the 25 percent extension to the tower in the eastern direction away from the residential areas near the plant. This configuration would minimize the impact of increased tower noise, plume drift, and public visibility. The tower would utilize electric fans powered from in-house sources and thus would not produce any diesel emissions. This alternative would not involve removal or re-disposal of existing spoil piles. Figure 2.2-10 shows the approximate location and footprint of the enlarged cooling tower for Alternative 2D.

Appropriate changes have been made to the text of Section 2.2.3, Associated Cooling Tower Impacts and Alternatives, to describe cooling tower capacity addition Alternative 2D.

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Comment ID	10
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	1.4.3
Comment	Page 1-10 states that "the current project at BFN will add approximately 250 MWs..." It is unclear, however, if this is for implementation of Alternative 1 or 2 (i.e., with or without Unit 1 restart). The FSEIS should document the projected additional power generation for each BFN unit and action alternative compared to the No-Action. Specifically, the FSEIS should quantify the additional MWs that would be generated for each unit at the proposed EPU power level and the total additional MWs generated at the BFN facility as a whole if Unit 1 was restarted versus remain shutdown, and the total additional MWs that would be generated at BFN if all three units would be operational and uprated. The nominal MW generation level for BNF as a whole should also be provided for each alternative and compared to the existing level.
Response	Appropriate text additions, including a new table summarizing changes in power levels have been added to section 2.2.1, Proposed Action Alternatives for this SEIS.

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Comment ID 11

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.2.3

Comment Page 2-18 indicates that Computational Fluid Dynamics (CFD) modeling on thermal discharges and reservoir receiving waters is being conducted to determine the level of additional cooling needed for Alternative 1 and 2 due to EPU and the potential restart of Unit 1. A reduced amount of additional cooling is being contemplated by TVA that would still be in compliance with temperature requirements of the existing NPDES permit. Although preliminary modeling results are generally discussed, final modeling will not be available until the FSEIS and "...certainly would be available during the NPDES review process." Such modeling should have already been completed at the DSEIS stage since the draft stage is the primary time for public review. Modeling results are important to the alternative analysis since various subalternatives exist for Alternative 2 that involve three cooling tower designs that affect effluent temperature.

Response Appropriate changes have been to the text of Section 2.2.3, Associated Cooling Tower Impacts and Alternatives.

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Comment ID 12

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.6.1

Comment We are pleased to note that despite the additional waste heat load associated with EPU (Alternatives 1 & 2) and the restart of Unit 1 (Alternative 2), the DSEIS indicates (pg. 2-39) that thermal discharges are expected to stay within compliance of the temperature limits of the current NPDES permit due to the proposed additional cooling towers. Compliance with NPDES permitting is a primary EPA concern and would be required for continued operation for whichever relicensing action is selected by TVA.

Response This comment does not require a response.

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Comment ID	13
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Sections	2.2.3 and 2.6.1
Comment	Although the relicensed BNF is expected to stay in compliance with its operational NPDES permit, the heat waste load is expected to increase for both Alternative 1 and 2 (pg. 2-37). The DSEIS discusses potential impacts to the Wheeler Reservoir aquatic resources associated with such incremental increases. It was indicated (pg. 1-19 [2-19]) that fish in the area are mobile enough to avoid thermal discharges (or be attracted to thermal plumes in winter for refuge or concentrated prey), that sessile benthic assemblages would not be affected due to discharge diffuser design and the fact that warm water rises within the water column, and that preliminary modeling predicts that the thermal plume would not extend across the Reservoir and therefore would not provide a thermal blockage. We acknowledge these preliminary modeling results or published studies.
Response	The text in Sections 2.2.3, Associated Cooling Tower Impacts and Alternatives; 2.6.1, Comparison by Resource; and elsewhere addressing the subjects of Surface Water Resources and Aquatic Ecology, has been revised to reflect final analyses.

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Comment ID	14
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Even though Wheeler Reservoir pool levels are controlled by TVA, will the receiving waters be at a lower pool during drought periods (which appear to be more common now than historically) such that there would be less volume available for thermal mixing, resulting in higher temperatures in the receiving waters?
Response	Drought conditions in the Tennessee Valley affect flow through Wheeler Reservoir to a much greater extent than elevations. Each spring, TVA allows Wheeler Reservoir to begin filling in mid March, with targeted summer levels to be reached by April 15. Local inflow is used to fill the reservoir (i.e. inflow from the unregulated area between Guntersville and Wheeler Dam) if there is insufficient inflows coming into Wheeler from upstream projects, as would be the case during drought conditions. TVA does not lower tributary pool elevations just to allow main river reservoirs, such as Wheeler, to fill on schedule. An examination of the 31 years of historical data from 1971 to 2001 indicates that the latest that Wheeler reached its normal summer operating zone (555 - 556) was late May, which occurred in 1986. In all other years, the normal summer operating range was reached no later than the end of April.

Once summer levels have been reached, droughts have little effect on the Wheeler elevations for the remainder of the year. Any minimum flow requirements needed downstream are supplied by withdrawals from the tributary reservoirs as well as planned (normal) drawdowns on the main river projects.

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Comment ID	15
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Similar to drought effects, will consumptive water use continue to increase in the Tennessee Valley (much as power needs are projected to increase) such that reservoir water levels would be further lowered, resulting in even less volume of receiving water available for thermal mixing?
Response	<p>As stated in the Final Environmental Impact Statement for the Tennessee River and Reservoir System Operation and Planning Review, dated December 1990, the minimum flow requirements past Browns Ferry Nuclear Plant are 10,000 cfs daily average in the months of July through September; 8,000 cfs daily average in the months of December through February; and 5,000 cfs otherwise.</p> <p>The increase in consumptive use (withdrawals from the Tennessee River system less returns to the system) for the year 2030 over present levels has been estimated to be 294 cfs for the Tennessee River system above Wheeler Dam. This represents about 3 percent of the present minimum daily average flow past BFN during the months of July through September, about 4 percent of the present minimum daily average flow during the months of December through February and about six percent of the minimum daily average flow during the rest of the year. Such increases will reduce the volume of water for thermal mixing. However, the percent change in flow is small compared to the overall entrainment and dilution of the thermal plume. As a result, related changes in the 24-hour average mixed temperature are expected to be insignificant. Also, the 24-hour average river flow at BFN drops below 10,000 cfs, on the average, only 2.7% of the time. Thus, the corresponding frequency of low flows where the impact of consumptive use would be the largest (i.e., below 10,000 cfs) is expected to be small.</p>

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Comment ID	16
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Will overall Reservoir water temperatures measurably increase due to global warming effects (which may be manifested over the lengthy 20-year license renewal term) such that ambient temperatures of receiving waters and the thermal plume become warmer on average than currently?

Response Whether or not water temperatures will measurably increase depends on the expected magnitude of global warming, which at this time cannot be reliably predicted. Climate variations summarized in Section 3.1.1 of the SEIS are considered to be natural, without any detectable affects of man-made global warming. However, in recognition of concerns about global warming, TVA has performed studies to examine the sensitivity of the river and power systems to extreme meteorology and climate variations (Miller et al., 1993). In terms of water temperature, the studies evaluated the response of three typical types of reservoirs found in the river system—a deep tributary reservoir, a transitional tributary reservoir, and a mainstream reservoir. Wheeler Reservoir is a mainstream reservoir. Based solely on changes in air temperature, average (April through October) water temperatures in the mainstream reservoir showed an increase of between 0.3 F° and 0.5 F° for each 1 F° increase in air temperature. Thus, if the air temperature at BFN were to increase by an amount of 1 F° or more, measurable increases in the average temperature of the ambient water and thermal plume would be expected. Global warming, if it occurs, will undoubtedly increase the challenge facing TVA in managing the river and power systems to maintain water temperatures within limits specified in plant NPDES permits and plant technical specifications.

References: Miller, B.A., V. Alavian, M.D. Bender, D.J. Benton, L.L. Cole, L.K. Ewing, P. Ostrowski, Jr., N.A. Nielsen, J.A. Parsley, W.B. Proctor, H.M. Samples, M.C. Shiao, and R.A. Shane, “Sensitivity of the TVA Reservoir and Power Supply Systems to Extreme Meteorology,” Tennessee Valley Authority, Resource Group, Engineering Services, Hydraulic Engineering, Report No. WR28-1-680-111, June 1993.

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Comment ID	17
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Although lethal thermal effects on fish species may be avoidable due to their mobility, will increased discharge and plume temperatures illicit [elicit] sublethal thermal effects expressed in behavior, reproduction, predator-prey relationships, etc. Will effects on juvenile fish or fish eggs and larvae differ from adults?
Response	Appropriate text has been added to Section 4.2.10.1 of the FSEIS

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Comment ID 18

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.6.1

Comment In the event that temperature limits for BFN effluent were to be lowered as part of permit renewals every five years, would any or all of the cooling tower subalternatives have the flexibility for additional cooling capacity in order to stay in compliance with such new limits rather than result in non-compliance or reduced (derated) power generation?

Response As explained in Section 2.2.3, Associated Cooling Tower Impacts and Alternatives, Alternatives 2A, 2B and 2C are bounding in that they provide the maximum anticipated change in terms of the number and size of additional cooling towers needed to avoid derates during almost all hot weather extremes. As such, these sub-alternatives would provide a conservatively large amount of additional cooling tower capacity and therefore would provide some inherent margin to absorb future changes without significant derates. Alternative 2D does not provide as large an initial increase in cooling tower capacity as that of Alternatives 2A, 2B and 2C but it has a great deal of flexibility to permit future increases in cooling tower capacity if the need should arise. Despite this margin, lowering BFN thermal limits would likely increase the amount of de-rates experienced in the future.

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Comment ID 19

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 2.6.1

Comment The temperature limits of the NPDES permit will be well below the thermal tolerance levels of reservoir aquatic species. However, to gain a perspective, we recommend that the FSEIS provide discussion on how close local aquatic species live near their thermal maximum compared to the ambient temperatures of Wheeler Reservoir. This would particularly be significant for important sport, commercial and ecological species to the extent that such species-specific thermal tolerance bioassay data are available. Also, do ambient temperatures upstream (i.e., before thermal addition) of BFN receiving waters ever naturally already equal or exceed regulatory NPDES permit temperature limits?

Response Appropriate text has been added to Section 4.2.10.1 of the FSEIS.

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Comment ID	20
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Page ES-12 indicates that Asiatic clams and zebra mussels exist within the Wheeler Reservoir system. Would the proposed additional thermal addition exacerbate these populations and in turn expedite the clogging of BFN intake systems? Would other aquatic nuisance species such as milfoil weed be enhanced by greater thermal addition? Would conditions be created that make Reservoir eutrophication more likely?
Response	<p>Appropriate text has been added to Section 4.2.10.3 of the FSEIS.</p> <p>The 10 percent increase in cooling intake water as described under alternative 2, would increase the potential for clogging of the Brown's Ferry intakes with aquatic plants. Some problems with clogging have occurred at the current levels of operation. The severity of the problem is expected to vary from year to year and be dependent on the abundance of aquatic plants upstream of the Brown's Ferry intakes. The most significant problems are anticipated during the late summer and fall months when the plants begin to "breakup" and form floating mats, during high flow events, and when there are strong winds from the south.</p> <p>Relatively high eutrophic conditions were recorded (TVA, 1980) in Wheeler Reservoir during the late 1970's, but phytoplankton productivity was usually consistent both above and below BFN. Previous data show eutrophic conditions have been recorded in most of Wheeler Reservoir even during periods of no plant operation. Therefore, additional thermal input from this proposal should not affect enough of the reservoir area to significantly increase eutrophication.</p>

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Comment ID	21
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Would the additional waste heat load exacerbate the condition of the 303(d) listed, 10-mile reach between Wheeler Dam and the Elk River, particularly given that the 303(d) parameters for this reach already include temperature/thermal modifications from industrial effluent?
Response	As indicated in the DSEIS (Section 4.3.6.3), modeling analyses were conducted to assess the potential thermal effects under current NPDES permit conditions. A two-dimensional model examined potential effects to the reservoir (and 303 (d) reach), under extreme conditions (i.e., without the use of cooling towers and during the hot and dry conditions experienced in 1988). The results indicated a slight increase (0.4 °F) in reservoir water temperatures in the 303 (d) listed reach

of Wheeler Reservoir for the proposed three-unit operations relative to the originally approved three-unit operations (Table 4.3.6-2, Reservoir Forebay). As indicated in the DSEIS, temperature effects are expected to be less than shown in Table 4.3.6.2 with the use of cooling towers and plant de-rates, if necessary, and in years of more typical hydrology and meteorology.

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Comment ID	22
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	Would hotter effluent discharges create additional fog at the surface of receiving waters during fall, winter and possibly cool early summer mornings? Would such fog impact local Reservoir navigation?
Response	<p>During periods when the surface of Wheeler Reservoir is warm and overlain by cool ambient air, hotter effluent discharges from BFN will increase the rate of evaporation from the water surface. This, in turn, will increase the amount of moisture in the air for the production of steam fog. Compared to three-unit operation of BFN at the original power levels, TVA estimates that for three-unit extended power uprate, the rate of evaporation during such events will increase approximately 2 percent on average, and on rare occasions might increase as much as much as 7 percent. The original analyses for the impact of fog on local water transportation estimated that river traffic could be affected roughly 147 hours per year by diffuser-related operation at BFN (TVA, 1972). Assuming that fogging would increase in direct proportion to the rate of evaporation, this period would increase, at most, to about 158 hours per year. This increase is small and is not expected to significantly exacerbate any existing diffuser-related fog impairments to navigation in the vicinity of BFN.</p> <p>References: TVA, "Environmental Statement, Browns Ferry Nuclear Plant, Units 1, 2, and 3," Volume 1, Section 8.2-11.(3), Tennessee Valley Authority, September, 1972.</p>

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Comment ID	23
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	2.6.1
Comment	The DSEIS (pg. 2-39) states that the 21% increase in BFN intake flows needed for Unit 1 operation under Alternative 2 "...may increase impingement of adult fish and entrainment of fish eggs and larvae." Given the TVA-assessed good health of Wheeler Reservoir fisheries (pg. ES-12), this TVA impact evaluation (i.e., <i>may</i> increase) appears to be understated. We believe that a significant increase in intake flow from a healthy natural water source can be expected to result in greater



Response This comment does not require a response.

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Comment ID 26

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 3.21.1.2

Comment Radiological impacts are stated to increase by "no more than 1.8 times...recently reported values after restart of Unit 1." The actual doses to the public [mrem/yr EDE] should be included in the FSEIS discussion in Section 4.3.21.2, although the limits established by EPA's 40 CFR 190, *Environmental Standards for Nuclear Power Operations*, will be easily met as before. Page 3-54 indicates that for 1999, liquid and gaseous releases were 1.2% and 0.3% of the action limits, which are 1/8 and 1/5 of the actual EPA limits, respectively.

Response Appropriate additions have been made to Section 3.21.1.2, Public [Radiological Impacts Baseline During Normal Operations].

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Comment ID 27

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section Appendix A

Comment In Appendix A, we note that *Severe Accident Mitigation* is discussed for the alternatives. After the events of September 11, 2001, new emphasis and discussion is needed regarding potential terrorist scenarios and how they may affect BFN's preparedness, as well as future radiological emergency exercises with the Federal Emergency Management Agency (FEMA) and other federal and state agencies. In the FSEIS, the public should be assured that the contingencies to prepare for such attacks and other emergencies have been discussed, planned, and exercised for TVA Browns Ferry.

Response TVA believes that the possibility of a terrorist attack affecting BFN operations is remote. Moreover, we do not believe that a potential terrorist attack creates the type of impact that can reasonably be considered to have been caused by, or be a likely or probable consequence of, TVA's proposed action in this instance. Notwithstanding the above, since the events of September 11, 2001, TVA has increased its level of security readiness and its security arrangements with local and Federal law enforcement agencies in response to safeguards advisories issued by the Nuclear Regulatory Commission (NRC). TVA's nuclear plants remain on the highest level of security alert. Recently, the NRC issued an order to nuclear plant licensees, including TVA, requiring additional compensatory measures to address the ongoing generalized potential threat environment. TVA will continue to follow the requirements of the order pending notification from the NRC that a

change in the threat environment has occurred, or until NRC determines that other compensatory measures are needed. In addition, NRC is performing a comprehensive re-evaluation of its security regulations. TVA will implement any additional requirements that result from this effort. The actions taken by TVA and NRC have reduced the potential for terrorist attacks on TVA's nuclear plants and have increased the capability to defend the nuclear plants from potential threats and attacks.

In addition, TVA has also taken measures to increase the level of cooperation and coordination between various Federal, State, and local agencies responsible for law enforcement and homeland security. TVA has specific agreements with the Governor's offices for the States of Alabama and Tennessee to provide a coordinated response to any future attack or emergency, including the use of National Guard and State Police resources, as necessary. The actions taken by TVA and Federal, State, and local agencies have also reduced the potential for terrorist attacks on TVA's nuclear plants and have increased the capability to defend the nuclear plants from potential threats and attacks.

Finally, at the national level, the government has taken additional measures to strengthen homeland security. These actions include the various measures taken to improve airline security and safety as it relates to potential terrorist threats. These actions have further reduced the potential for terrorist attacks on TVA's nuclear plants.

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Comment ID	28
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	4.3.1.4
Comment	A distinct environmental advantage of nuclear power plants compared to fossil-fired power plants is that they do not produce CO <sub>2</sub> , NO <sub>x</sub> , SO <sub>x</sub> and other emissions to generate power. However, some of these emissions are generated through support facilities and plant deliveries such as diesel generators, auxiliary steam boilers, vehicular/construction traffic, and cooling tower drift losses. Emissions include CO, CO <sub>2</sub> , PM, NO <sub>x</sub> , SO <sub>x</sub> and VOCs. It is unclear as to why CO <sub>2</sub> was not referenced (e.g., pg. 4-29) given that most combustion (e.g., diesel and gasoline engines) would emit more CO <sub>2</sub> than CO if properly tuned.
Response	Although CO <sub>2</sub> generation at a nuclear plant is very minor compared to that produced at a fossil-fueled plant, identification of CO <sub>2</sub> as an emission has been added in the text of the FSEIS in Sections 3.1.3, 4.2.1.4, and 4.3.1.4. Other than relatively short-term and intermittent emissions associated with construction activities and increased work force traffic, CO <sub>2</sub> emissions from operation of the three units would not be increased beyond those already experienced to date.

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Comment ID	29
Name	Heinz J. Mueller

Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	4.2.1.2
Comment	We note that page 4-8 references emission analyses in Section 2.5 (Vol. 1) of the original 1972 EIS. While we agree with a reasonable incorporation by reference, the results for the level of emissions previously calculated should be adopted from the 1972 EIS and presented in a FSEIS table by emission source and by alternative. Calculated data apparently include emissions for diesel generators and cooling tower drift losses. Other additional emission sources should also be reasonably inventoried, and listed with their emissions qualified in terms of the level of emissions (substantive, minor, intermittent, etc.), purpose (cooling tower, pumping, vehicular, etc.) and time/season of operations (daily, summer only, etc.) for each alternative. No additional calculations are requested unless updates are needed or substantive cumulative emissions for any air quality parameter are expected.
Response	Tables of 1) emissions calculation data from the 1972 EIS and 2) other additional emission sources have been added to Section 4.2 of the FSEIS.

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Comment ID	30
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	4.3.14.1
Comment	Also related to air quality, page ES-25 indicates that traffic on access roads to BFN (Shaw Road, Nuclear Plant Road and Browns Ferry Road) would increase from 1,600 to 2,900 vehicles per day during construction and temporarily be at a lower Level of Service (LOS). The FSEIS should reference the predicted LOS (should not be less than LOS C for safety, air quality & flow) and the approximate time span for this decreased LOS.
Response	<p>The methodology in the Highway Capacity Manual (Transportation Research Board, 1994) was used to determine levels of service as provided to the roadway user. The manual provides a qualitative method to measure the operational conditions within a traffic stream, and their perception by motorists. The sum of the estimated existing traffic and the projected additional peak traffic was compared with that volume of traffic which is acceptable for a level of service D. Level of service D represents high-density, but stable flow. Tolerable average operating speeds are maintained but are subject to considerable and sudden variation. Although most drivers would consider this service level undesirable, unstable flow has not yet been reached and the roadway condition can be tolerated for short periods of time (i.e., during plant shift changes).</p> <p>Appropriate changes have been made to the Executive Summary Section S.4 on Environmental Consequences for Transportation during Unit 1 recovery (Alternative 2).</p>

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Comment ID	31
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	
Comment	<p>Since construction would be a relatively important source of emissions, we are pleased to note (pg. 2-29) that the time frame for the restart of Unit 1 was disclosed (5.5 years). However, we note that construction impacts would be rather long termed as opposed to <i>temporary</i> as indicated in the DSEIS. We assume that the 5.5-year period would also incorporate other construction such as uprating of Units 2 &amp; 3 and construction of additional buildings. The FSEIS should verify this.</p>
Response	<p>As stated in Section 2.4.2.1, Restart of Unit 1, Unit 1 recovery involves a large amount of analytical work as well as a large number of modifications and equipment changes internal to the plant; accordingly, the impact on the air, land, and water environment surrounding the facility is expected to be negligible. The projected external construction tasks, either individually or cumulatively, are relatively limited in terms of duration or environmental impacts and would not be characterized as being a significant source of emissions. This is particularly true since the most likely cooling tower subalternatives do not involve major spoils relocation or new site preparation.</p> <p>It should also be noted that, as shown in Figure 2.4-2, the heavy majority of the craft work for Unit 1 recovery does not take place until well into the second half of the schedule. In contrast, as stated in Sections 2.3.3 and 2.4.2.2, construction of the new Modifications/Fabrication and Administration buildings would begin almost immediately after a favorable decision on Unit 1. The majority of the work on the initial phases of the Dry Cask Storage Facility for spent fuel would be completed before 2005 (as stated in Section 2.3.2), which is after the new Mod/Fab and Admin buildings but well before most of the Unit 1 construction work.</p> <p>Extended Power Uprate (EPU) work for Units 2 and 3 was addressed in a separate Environmental Assessment (EA) and is, accordingly, not addressed in this SEIS as a proposed action. However, as stated in the EPU EA, the only construction issue of any environmental significance is the additional cooling tower capacity required, which has been factored into the discussions of this topic in this SEIS as a cumulative impact. The additional cooling tower capacity required would most likely be constructed in parallel with the Dry Cask Storage Facility concrete work.</p>

Comment ID	32
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Sections	2.6.1 and 4.3.19.1

Comment Assuming that at least some form of on-site construction would last for 5.5 years, we do not agree, as suggested above, that construction noise would be "...for a relatively short time" (pg. 2-42). TVA may wish to distinguish in the FSEIS between general cooling tower and building construction versus Unit 1 refurbishment in terms of their longevity. We appreciate that a range of noise levels for basic construction equipment at 50 feet was provided (pg. 4-54).

Response Appropriate changes have been made to the Environmental Noise portion of Section 2.6.1, Comparison by Resource.

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Comment ID 33

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 4.3.19.1

Comment We do not totally agree with the assumption (pg. 4-54) that construction noise should be insignificant because "[p]eople understand that construction projects use heavy equipment and that the equipment produces noise, and they understand that the construction has an end point" and that "[f]requently, people like to watch the equipment work and the noise is part of the experience." We suggest that the other reasons listed on page 4-54 be emphasized such as noise generally being limited to daytime and a normal business week. Moreover, the FSEIS should commit to such noise abatement rather than just indicating that "noise effects can be addressed or ameliorated in several ways if necessary." Considering the long-termed nature of construction in this case (5.5 yrs), this becomes important.

Response Appropriate changes to section 4.3.19.1, Construction Noise, have been made.

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Comment ID 34

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 4.4.19

Comment Noise from general plant operation and support would be increased during operation of the fan motors of the cooling towers. Cooling towers, however, would apparently only operate 17-27 days per year. During operation, noise levels at the nearest residences (Paradise Shores S/D) would be elevated +3 to +7 dBA Leq(24) and +5 to +9 dBA DNL, depending on the fan vendor selected. Given ambient levels of 47 dBA Leq(24) and 52 dBA DNL, respectively, these increases may or may not be significant per the Federal Interagency Committee on Noise (FICON). The FSEIS should verify. However, we do note that given the short time of cooling tower use per year, the annualized levels are reduced to +3 dBA DNL for both the 17 and 27 days of operation. This level of increase would not be considered significant per FICON at the ambient level of 50 dBA DNL. Nevertheless, because operational periods would likely noise-impact Paradise

Shores S/D, we suggest that source reduction methods (low-noise fan motors: pg. 4-66) be achieve[d] through careful selection of the fan vendor. We also note that "TVA is not committing to use such fans at this time" but, we believe, should consider such in the FSEIS. EPA further suggests that towers closest to the residences (3 & 4), be the last of the 6-8 towers to be operated and first to be shutdown in order to minimize noise (i.e., Leq(24) is reduced by 6 dBA: pg. 4-66). The FSEIS should further discuss this and consider a commitment to implement this protocol.

Response

The Leq(24) at Paradise Shores is estimated to increase 3 to 7 dBA for Alternative 2C as noted in this comment. Alternatives 2A and 2B have 0 (zero) and 1 dBA increases, respectively, in the Leq(24). The incremental increase in operational noise from the cooling tower for the TVA preferred alternative Alternative 2D is about a 1 dBA increase over current operational noise. With regard to the potential impacts of the 24-hr. DNLs from Alternative 2C, with vendors 1 and 2 having 9 and 5 dBA increases, respectively, appropriate text changes have been made in Section 4.3.19.3.1. TVA would further analyze several options for mitigating the potential noise increase at Paradise Shores prior to accepting the final design for the cooling towers from the selected vendor. Some of the options include, but are not limited to: using low noise fans on all cooling towers for Alternative 2C; using low noise fans only on towers 3 and 4; instituting operating instructions to minimize the use of towers 3 and 4; and soliciting other noise reduction options from the cooling tower vendor.

For Alternative 2D, the new tower would reside on the location of a vacant cooling tower basin with the 25 percent extension to the tower in the eastern direction away from the residential areas near the plant. This configuration would minimize the impact of increased noise. Further, low noise fans would be considered as part of the procurement process; TVA would consider the available technologies, relative costs and noise reduction efficiencies in making its decision at that time. However, because under this alternative they would be the most efficient, towers 3 and 4 would probably be operated first and shutdown last in order to maximize heat removal efficiency.

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Comment ID 35

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Sections 4.2.7 and 4.3.7

Comment We note that ground water will not be used for BFN cooling. The FSEIS should indicate, however, if the on-site waste lagoons would affect ground water (i.e., are the lagoons lined and is the leachate monitored?). Also, what wastes would be contained in the lagoons?

Response Appropriate changes have been made to text in sections 3.7.1, 4.2.7.1, and 4.3.7.1 of the FSEIS.

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Comment ID 36

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 3.2.3

Comment Page ES-8 states that "[t]he BFN is located in an area far removed from any centers of significant seismic activity in historic time." It is noted, however, that an earthquake registering 3 or more on the Richter Scale recently occurred in December 2000 in the general vicinity (near Scottsboro, AL). What structural or other effects, if any, did this have on BFN (and parenthetically, the unfinished TVA Bellefonte Nuclear Plant near Scottsboro) and what additional seismic activity, if any, can be expected in the vicinity of BFN in the future?

Response Appropriate changes have been made to the text in section 3.2.3 of the FSEIS.

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Comment ID 37

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 1.2

Comment We suggest that Figure 1.2-1 (pg. 1-3) be improved by labeling or including and labeling water-related features such as the Tennessee and Elk Rivers, Wheeler Dam, and the 303(d) reach between the Dam and the Elk River.

Response A new figure has been included which indicates the suggested additions.

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Comment ID 38

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section 1.5.3.1.1

Comment The *Generic Environmental Impact Statement for License Renewal of Nuclear Plants* (GEIS: NUREG-1437) was referenced on page 1-18. The FSEIS should provide a publication date for the GEIS and perhaps include it in the references on page 1-22.

Response The original two volumes of NUREG-1437, *Generic Environmental Impact Statement for License Renewal of Nuclear Plants*, are identified as both the Main Report and the Final Report and are dated as being published in May 1996. Various Supplements and Addenda have since been issued. The year of publication has been added to the text, and the document has been included in the references for Chapter 1.

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Comment ID 39

Name Heinz J. Mueller

Affiliation U.S. Environmental Protection Agency, Region 4

DEIS Section N/A

Comment The original EIS is sometimes referred to as an *Environmental Statement* (pg. ES-8, ES-19, 1-17) as opposed to an *Environmental Impact Statement* or *EIS*, and should be corrected and made consistent in the FSEIS.

Response The 1972 comprehensive environmental analysis of the construction and operation of the Browns Ferry Nuclear Plant was titled as an Environmental Statement since it predated the commonly used present-day title of Environmental Impact Statement (EIS). Since the correct 1972 title is an **Environmental Statement** but it actually is an **EIS** in current terminology, the former is used wherever the complete title is needed and the latter is used wherever the abbreviation for the type of document is sufficient.

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Comment ID	40
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	N/A
Comment	We suggest that the cooling towers be labeled when shown on figures in Chapter 2 (e.g., Fig. 2.0-1 and 2.2-1). Similarly, the three units should also be identified.
Response	The appropriate figures in Chapter 2 have been updated to identify the cooling towers and the reactor units.

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Comment ID	41
Name	Heinz J. Mueller
Affiliation	U.S. Environmental Protection Agency, Region 4
DEIS Section	3.19.5
Comment	Table 3.19-2 (pg. 3-45) should clarify the time frame of the data presented for "Background Leq" (9 hr or 15 hr?) and the "Total Leq" (24 hrs?). Also, data in the table do not always agree with the text.
Response	Appropriate changes have been made to Section 3.19, Potential Effects of Environmental Noise.

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Comment ID	42
Name	Gregory L. Hogue
Affiliation	U.S. Department of the Interior, Acting Regional Environmental Officer
DEIS Section	N/A
Comment	The Department of the Interior has reviewed the Draft SEIS for the referenced document. We have no comments at this time. Thank you for the opportunity to review this document.
Response	This comment does not require a response.

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Comment ID 43

Name Jack M. Hilliard

Affiliation City of Florence Utilities, General Manager

DEIS Section N/A

Comment Thank you for the TVA Draft Supplemental Environmental Impact Statement for Operating License Renewal of the Browns Ferry Nuclear Plant in Athens, Alabama.

This letter will advise you that I support the twenty-year extension of the license from the Nuclear Regulatory Commission (NRC) for operation of Units 1, 2 and 3, of the Browns Ferry Nuclear Plant (BFN) located in Limestone County, Alabama.

With the ever-increasing need for power generation in the Valley and the need for a balanced energy supply in the Valley and our nations, nuclear energy can provide for that need and balance.

Response This comment does not require a response.

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Comment ID 44

Name Marie Watkins

Affiliation

DEIS Section N/A

Comment I am a Senior Citizen living alone within a ten mile radius of Browns ferry Nuclear Plant. I live in constant horror and fear of any kind of accident happening there. I can't understand why we continue to build or restart nuclear plants when one bad accident could take thousands of lives. With today's research and technology, I'm sure there are already alternate sources of power.

I'm wandering [sic] how many people who are for nuclear energy live within a ten mile radius of a plant?

Response Severe accidents are addressed in the FSEIS in Sections on Radiological Impacts (3.21, 4.2.21 and 4.3.21). Security readiness for September 11, 2001 types of events is addressed above in the response to Comment 27. Alternative sources of power are addressed in Section 1.4, Projecting TVA's Needs for Generating Capacity. TVA has not taken a poll of individuals residing within 10 miles of BFN, but it can be noted that more than twice as many favorable comments have been received than negative comments.

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Comment ID 45

Name Barrett Shelton

Affiliation The Decatur Daily, Publisher

DEIS Section N/A

Comment Unit one at Browns Ferry Nuclear plant should be restarted. Certainly you and TVA know of many reasons why, possibly the most important being the uncertainty of future power sources. Early in the days of nuclear power it was considered a bridge to the next source of power, but that new source isn't here now nor does it seem close. Thus nuclear, including unit one, may have to carry us longer than ever expected.

Response This comment does not require a response.

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Comment ID 46

Name Dan Williams

Affiliation The City of Athens, Alabama, Mayor

DEIS Section N/A

Comment The City of Athens and Athens Utilities supports TVA in its efforts to re-license Browns Ferry Nuclear Plant and would like to encourage the TVA Board of Directors to give every consideration to restarting Unit 1 at Browns Ferry. We believe that a reliable, low-cost supply of electricity is essential for continued economic development in the Tennessee Valley and that Browns Ferry Nuclear Plant is a valuable asset in achieving this objective.

Response This comment does not require a response.

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Comment ID 47

Name Lynn Fowler

Affiliation The City of Decatur, Alabama, Mayor

DEIS Section N/A

Comment I very much support the restart of Unit 1 and the extension of licenses for 1, 2, and 3.

Response This comment does not require a response.

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Comment ID 48  
Name Anonymous response from Public Meeting  
Affiliation  
DEIS Section N/A  
Comment I'm very much in favor of re-starting Unit 1 as the benefits far out-weigh any of the negatives.  
Response This comment does not require a response.

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Comment ID 49  
Name Rick Humphreys  
Affiliation Decatur/Morgan County Lodging Association, President  
DEIS Section N/A  
Comment As the General Manager of The Holiday Inn Hotel & Suites in Decatur, and as the president of the Decatur/Morgan County Lodging Association, it is my privilege to fully endorse this project. We are excited about the economic impact that it will bring to our area. Thank you very much  
Response This comment does not require a response.

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Comment ID 50  
Name Ellis B. Chenault  
Affiliation Decatur – Morgan County Convention and Visitors Bureau, President  
DEIS Section N/A  
Comment RESOLUTION  
  
WHEREAS, the Decatur-Morgan County Convention and Visitors Bureau is organized to achieve the objective of stimulating the economic and cultural environment of Decatur and Morgan County through the promotion of its attractions, events, recreational and meeting facilities and to increase the number of visitors to the City/County for business or pleasure; and  
  
WHEREAS, TVA seeks public comment on a draft supplemental environmental impact statement that examines the potential impacts of a proposal to extend the operation of Units 2 and 3 and potentially the restart of Unit 1 at Browns Ferry Nuclear Plant; and

WHEREAS, extension of the operating licenses for Browns Ferry Nuclear Plant would generate jobs, income tax revenues, and sales tax revenues for Decatur/Morgan County, the North Alabama region, and the State of Alabama; and

WHEREAS, the hospitality industry relies heavily on the corporate business traveler and would benefit directly from increased occupancy; and

WHEREAS, the results would be an increase in the lodging taxes collected for the State of Alabama and Decatur/Morgan County; and

THEREFORE, BE IT RESOLVED that the Decatur-Morgan County Convention and Visitors Bureau hereby adopts this resolution in support of the proposed extension of operating licenses for Unit 2 and 3 and the restart of Unit 1 at Browns Ferry Nuclear Plant.

Response This comment does not require a response.

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Comment ID 51

Name Teddy Taylor

Affiliation Received e-mail

DEIS Section N/A

Comment My name is Teddy Taylor from Jamestown TN. I believe we need to go with unit 1 @ browns ferry for sure. We need all the power we can produce here @ home!!

Response This comment does not require a response.

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Comment ID 52

Name Lee Coker

Affiliation Received e-mail

DEIS Section N/A

Comment Hello.  
I will not be able to attend your public comment night for the Brown Ferry Nuclear Plant but would like to make a comment for the EIS. I feel that nuclear power is neither safe nor sustainable and am shocked and disappointed that TVA would seek to further the use of one of the least safe nuclear plants in the country. I feel that the lives and land of the great state of Alabama are beginning put in danger by your Browns Ferry Plant and am outraged at your audacity [sic] to try to reopen a plant that has had one of the most dangerous accidents at any nuclear plant in the country. Nuclear energy is no where near as effecient [sic] as solar, wind, or conservation measures. I would love to see you guys reuse your waste heat at any steam generation plants in the future.

Sincerely,  
Lee Coker

Response As explained in Section 1.5, TVA has significantly improved the performance of BFN to the point where it is now considered to be among the top performing plants in the country. Severe accidents are addressed in the FSEIS in Sections on Radiological Impacts (3.21, 4.2.21 and 4.3.21). Security readiness for September 11, 2001 types of events is addressed above in the response to Comment 27. Alternative sources of power are addressed in Section 1.4, Projecting TVA's Needs for Generating Capacity. Re-use of waste heat continues to be considered by TVA but is outside the scope of this EIS.

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Comment ID 53

Name Rick Jobe

Affiliation

DEIS Section N/A

Comment I live in Huntsville and attend Athens State University as an adult student, therefore have standing and an acute interest in the environmental, economic and social issues in the area surrounding Browns Ferry Nuclear Power Plant. I have studied many public documents and followed the operation of the plant as a concerned citizen and sometimes intervener in the licensing process at Browns Ferry, off and on since the fire in 1976.

As a middle aged man with a family I am aware that our options regarding energy demand are complex and get more difficult every year. Even though I have sometimes been at odds with T.V.A.'s plans concerning nuclear (such as opposition to incineration of waste) I am sympathetic and sometimes proud of T.V.A.'s record as an agency that has been willing to be out front on alternative energy options.

I've also lived long enough to know that the citizens and the agency are much more effective as partners in the production of energy and the careful stewardship of our resources.

That being said, I would like to raise a voice of concern regarding plans to extend the life of one the nation's oldest nuclear power plants (Browns Ferry) and to restart Unit 1. I don't think either is a good idea.

Even though Browns Ferry has vastly improved its safety record in recent years there are still unresolved problems regarding permanent waste storage and safety. The threat of tornado is not one to be overlooked regarding storage facilities, cooling towers and reactor building.

Most importantly, our world has changed dramatically since September 11. It's time for us to realize that nuclear power poses an unacceptable risk to the valley and to the nation as a result of a growing willingness on the part of international terrorists to commit suicide while destroying sensitive facilities and causing great, long term havoc.

It doesn't strike me as anywhere near impossible to conceive of a determined terrorist obtaining access to an airplane, large or small and crashing it into the reactor building. We all know that if a candle can bring Brown's Ferry to the brink of a disastrous melt-down with the potential to contaminate the Tennessee River and perhaps the whole valley, that it could surely be done by a large vehicle falling from the sky. The amount of time it would take a terrorist to get an airplane from Huntsville airport to Brown's Ferry by simply following the river combined with the ease of identifying the power plant and reactor buildings is a frightening thought.

The long term effects of this kind of accident are well documented in the former Soviet Union and would result in the contamination of our precious land and water for well beyond all our lifetimes.

We owe it to our children to phase out nuclear power and to wake up to the need for conservation, solar, cleaner coal plants, hydro etc. A terrorist act on any of these facilities might be a temporary and large problem but the scale of destruction for the long term pales in comparison to what might result from an attack on a nuclear facility.

Times have changed and so must we.

Please read this letter at the public meeting January 17th at Calhoun Jr. College which I cannot attend due to prior commitment at Athens State College if this is at all possible.

I would also like to be informed of any future hearings on these and related matters. I would prefer any responses or forwarded documents to be electronic whenever possible. I don't want to have or to waste the paper.

Thank You Sincerely;  
Rick Jobe

Response                      Spent fuel storage activities are discussed in the FSEIS in Sections 2.2.4, Spent Fuel Storage Options; and 2.3.2, Dry Cask Storage Facility. Tornado resistance and other safety considerations are addressed in the BFN Final Safety Analysis Report. Severe accidents are addressed in the FSEIS in Sections on Radiological Impacts (3.21, 4.2.21 and 4.3.21). Security readiness for September 11, 2001 types of events is addressed above in the response to Comment 27. Alternative sources of power are addressed in Section 1.4, Projecting TVA's Needs for Generating Capacity.

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Comment ID	54
Name	Lorraine Smith
Affiliation	
DEIS Section	N/A
Comment	In regards to extending the operating license for Browns Ferry Nuclear Power Plant, we generally are opposed to nuclear plants. The reason for this is the increased activity of terrorists in today's world. Until true security can be

accomplished at nuclear plants we feel uncomfortable with the extension.

Response Security readiness for September 11, 2001 types of events is addressed above in the response to Comment 27.

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Comment ID 55

Name Frank Powell

Affiliation

DEIS Section N/A

Comment Gentlemen: I strongly favor renewal/extension of the Browns Ferry nuclear facility license. I am also concerned that "anti-nuclear" elements are vigorously pursuing ways to halt all nuclear power production at a time when our electrical energy needs are approaching present production capabilities. The near energy crisis in California should serve as a warning.

I am also concerned that environmentalist attacks on coal-fired energy could hasten the time when our needs exceed capacity. Entrenched forces within government bureaucracies seem determined to halt all coal-fired plant construction and eventually close all such existing plants. Their contentions that wind and solar facilities can some day supply our electrical energy needs are pipe dreams.

I oppose TVA's wind and solar programs since they have been proven to be cost inefficient. TVA's "green power" project, I feel, is an expensive concession to the militant environmentalists, and the voluntary \$4.00 surcharge will not cover the expense of construction and maintenance.

I also strongly urge returning Unit 3 reactor to service at Browns Ferry as soon as possible.

Thank you for this opportunity to comment.

Response This comment does not require a response.

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Comment ID 56

Name Thomas Hruby

Affiliation

DEIS Section N/A

Comment It seems to me to be imperative to continue the operation of Browns Ferry as a power source. In fact, all units should be operating as much as possible. I believe our country will be in serious problems if we do not expand the use of nuclear power sources.

Whatever it takes to keep the operation going is imperative. I do believe some of the safety requirements need revisiting to make them reasonable.

Response This comment does not require a response.

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Comment ID 57

Name Joan Jackson

Affiliation

DEIS Section N/A

Comment This is to register my opinion on the operating extension for units 2 and 3, and the possible re-start of unit 1 at Browns Ferry Nuclear Power Plant.

I live in Huntsville and have resided here for over 40 years. In the past, we hoped that any accidental emissions from the nuclear plant would be small and probably would not affect this area. However, since September 11, 2001, our concern has deepened. Because of the close proximity of Huntsville International Airport, there would be no time to intercept a hijacked plane with Browns Ferry as the intended target. Although the possibility of this happening is small, it still remains a possibility with an outcome beyond our ability to control.

In view of the current terror threat in this country and taking into account the age of the units, it is my opinion that TVA would be negligent to put a large civilian population (or Redstone Arsenal's military population) in harm's way.

It is my hope that TVA will shut down its nuclear plant at Browns Ferry and begin clean up of stored spent fuel at that site.

Response Security readiness for September 11, 2001 types of events is addressed above in the response to Comment 27. The effects of equipment aging are addressed in Section 2.4, Description of Actions Specific to Associated Alternatives.

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Comment ID 58

Name John Hatfield

Affiliation Morgan County Economic Development Association

DEIS Section N/A

Comment As President/CEO of the Morgan Co. Economic Development Association, I want to thank you for exploring the issue of starting the third reactor at Browns Ferry. Obviously, not only would it provide more reliable power for manufacturers in the area, it itself would create many jobs. I encourage TVA to continue this endeavor.

Response This comment does not require a response.

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Comment ID 59  
Name Tom Wright  
Affiliation  
DEIS Section N/A  
Comment We need Browns Ferry Unit 1 up and going and the life of Units 2 & 3 extended.  
I've lived in Decatur 23 years and the plant is part of who we are. As long as TVA maintains quality controls and watches costs, Browns Ferry is a tremendous asset.  
Response This comment does not require a response.

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Comment ID 60  
Name Jack Fite  
Affiliation The Decatur-Morgan County Chamber of Commerce, Chairman  
DEIS Section N/A  
Comment The Decatur-Morgan County Chamber of Commerce supports the re-start of Unit I and looks forward to playing an active role in helping new and existing businesses participate.  
Response This comment does not require a response.

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Comment ID 61  
Name John Diehl  
Affiliation  
DEIS Section N/A  
Comment Dear Sir,  
What's happening with the Unit One restart proposal? Is anything happening with Bellefonte? (I am a native Huntsville, but work as a Health Physicist at the South Texas Project, hence my interest in Bellefonte). I would point out that of the seven operational B&W units, four have been re-licensed and the remaining three are likely to see license renewals, thus Bellefonte has enormous long term economic potential. Analysis of the cost of restarting BF1 (1100 MW?) should be balanced against the cost of starting Bellefonte 1 and 2 (1600 - 1800 MW combined). The issuance of a new license could make other stranded investments

become viable (Watts Bar 2) and ultimately lower the regulatory hurdles facing BF1. Please let me know of TVA's progress on these fronts.

Sincerely  
John Diehl

Response

The planned milestones for BFN operating license renewal, which include potential recovery of Unit 1, are listed in the Executive Summary. Bellefonte and Watts Bar are outside the scope of this SEIS, but the status of these projects are frequently reported in area newspapers.

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