



Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37384-2000

March 27, 2006

Ms. Pamala Myers
Permit Section
Tennessee Department of Environment & Conservation
Division of Water Pollution Control
6th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1534

Dear Ms. Myers:

SEQUOYAH NUCLEAR PLANT (SQN) - NATIONAL POLLUTANT DISCHARGE ELIMINATION
SYSTEM (NPDES) PERMIT NO. TN0026450 – ADDITION OF MSW-101 TO THE
BIOCIDE/CORROSION TREATMENT PLAN

Sequoyah Nuclear Plant (SQN) plans to add MSW-101 to our Biocide/Corrosion Treatment Plan. This addition is considered a minor change by SQN due to the fact that MSW-101 is similar to the already approved PCL-222. All relevant information (frequency of discharge, active ingredients, discharge concentration, maximum daily usage, MSDS, product bulletin, etc.) on MSW-101 is attached. SQN considers this a courtesy notification which does not require pre-approval and will submit this information again in the 2007 annual report.

If you need additional information or have comments or questions, please contact Ann Hurt (423-843-6714) or myself (423-843-6700).

I certify under penalty of law that this document and all of its attachments were prepared under my direction or my supervisor in accordance with a system designed to assure qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Stephanie A. Howard
Principal Environmental Engineer
Signatory Authority for
J. Randy Douet
Site Vice President
Sequoyah Nuclear Plant

2001

Enclosures
cc (Enclosures):

Mr. Edward M. Polk, Jr., P.E.
Manager, Permit Section
Tennessee Department of
Environment & Conservation
Division of Water Pollution Control
6th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1534

Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Chattanooga Environmental Assistance Center
Division of Water Pollution Control
State Office Building, Suite 550
540 McCallie Avenue
Chattanooga, Tennessee 37402-2013

Raw Water Chemical Additives at Sequoyah Nuclear Plant

PRODUCT	PURPOSE	FREQUENCY OF DISCHARGE	ACTIVE INGREDIENTS	REPRESENTATIVE AQUATIC TOXICITY /DESCRIPTOR	DISCHARGE CONCENTRATION ¹
				(ppm active ingredients)	(ppm active ingredients)
MSW-101 ²	Dispersant to facilitate iron corrosion inhibition	Continuous	Orthophosphate, Hexametaphosphate	<p>Pimephales promelas 7-day NOEC Growth = 625 mg/L 7-day LOEC Growth = 1,250 mg/L</p> <p>Ceriodaphnia dubia 7-day NOEC Reproduction = 313 mg/L 7-day LOEC Reproduction = 625 mg/L</p>	≤ 0.2

1. The maximum discharge concentration is indicated EXCEPT where noted. Discharge concentrations are achieved through dilution.
2. Toxicity of MSW-101 assumed to be similar to PCL-222. No actual toxicity data available for this product. Tests will be conducted at a toxicity lab under contract to the manufacturer.



Raw Water Chemical Application Guide¹

Product	Injection Points	Max Feed (ppm)	In Plant Target (ppm)	Frequency of Application	Average Duration of Application.	Estimated Max Days per Year	Maximum Daily Usage (lbs/day) ²
MSW-101 ³	ERCW Train A & B and RCW	2.4	2.4	Daily	24 hours per day	365	2280

1. Concentrations and usage are expressed for the active ingredient(s) shown in the previous table of this plan.
2. Maximum Daily Usage provides an indication of loading in the receiving stream. It is the maximum amount of active ingredients for the worst case scenario of flow and feed concentration being proposed plus a 10% margin of error. SQN will request a change to this plan should an increase in maximum daily usage becomes necessary for the continued safe operation of the plant.
3. MSW-101 is a blend of orthophosphate and hexametaphosphate. MSW-101 is injected into the RCW system continuously, except during periods of other chemical injection due to common injection lines. MSW-101 is injected into the ERCW Train A & B system only during warm weather months. During cool weather months PCL-401 is injected.

Calculations Showing Worst Case Scenario (final values rounded to the nearest 5 lbs)

MSW-101	2.4 mg	1 lb	71,800 gal	3.785 L	60 min	24 hr	1.10	= 2280 lbs/day MSW-101
2.4 ppm active	L	454,000 mg	min	gal	1 hr	day		

MSW-101	
A dispersant commonly used in water treatment programs. MSW-101 is a phosphate dispersant used to minimize fouling and under-deposit corrosion in the ERCW and RCW systems. This product makes carbon piping corrosion inhibitors more effective. MSW-101 is not considered hazardous per OSHA regulations.	
Document	Summary
 MSW-101 MSDS	Material Safety Data Sheet.
 MSW-101 PB	Product Bulletin

**MATERIAL SAFETY DATA SHEET****PRODUCT****MSW-101****EMERGENCY TELEPHONE NUMBER(S)****(800) 424-9300 (24 Hours) CHEMTREC****1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION****PRODUCT NAME :** MSW-101**APPLICATION :** WATER TREATMENT**COMPANY IDENTIFICATION :** Nalco Company
1601 W. Diehl Road
Naperville, Illinois
60563-1198**EMERGENCY TELEPHONE NUMBER(S) :** (800) 424-9300 (24 Hours) CHEMTREC**NFPA 704M/HMIS RATING****HEALTH:** 0/1 **FLAMMABILITY:** 0/0 **INSTABILITY:** 0/0 **OTHER:**
0 = Insignificant 1 = Slight 2 = Moderate 3 = High 4 = Extreme**2. COMPOSITION/INFORMATION ON INGREDIENTS**

Based on our hazard evaluation, none of the substances in this product are hazardous.

3. HAZARDS IDENTIFICATION****EMERGENCY OVERVIEW******CAUTION**

May cause irritation with prolonged contact.

Do not get in eyes, on skin, on clothing. Do not take internally. Use with adequate ventilation. In case of contact with eyes, rinse immediately with plenty of water and seek medical advice. After contact with skin, wash immediately with plenty of water.

Wear suitable protective clothing.

May evolve oxides of phosphorus (POx) under fire conditions.

PRIMARY ROUTES OF EXPOSURE :

Eye, Skin

HUMAN HEALTH HAZARDS - ACUTE :**EYE CONTACT :**

No adverse effects expected.

SKIN CONTACT :

No adverse effects expected.

INGESTION :

Not a likely route of exposure. No adverse effects expected.

Nalco Company 1601 W. Diehl Road • Naperville, Illinois 60563-1198
(630)305-1000



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INHALATION :

Not a likely route of exposure. No adverse effects expected.

SYMPTOMS OF EXPOSURE :

Acute :

A review of available data does not identify any symptoms from exposure not previously mentioned.

Chronic :

A review of available data does not identify any symptoms from exposure not previously mentioned.

AGGRAVATION OF EXISTING CONDITIONS :

A review of available data does not identify any worsening of existing conditions.

4. FIRST AID MEASURES

EYE CONTACT :

Flush affected area with water. If symptoms develop, seek medical advice.

SKIN CONTACT :

Flush affected area with water. If symptoms develop, seek medical advice.

INGESTION :

Do not induce vomiting without medical advice. If conscious, washout mouth and give water to drink. If symptoms develop, seek medical advice.

INHALATION :

Remove to fresh air, treat symptomatically. If symptoms develop, seek medical advice.

NOTE TO PHYSICIAN :

Based on the individual reactions of the patient, the physician's judgement should be used to control symptoms and clinical condition.

5. FIRE FIGHTING MEASURES

FLASH POINT :

None

EXTINGUISHING MEDIA :

This product would not be expected to burn unless all the water is boiled away. The remaining organics may be ignitable. Keep containers cool by spraying with water. Use extinguishing media appropriate for surrounding fire.

FIRE AND EXPLOSION HAZARD :

May evolve oxides of phosphorus (POx) under fire conditions.

SPECIAL PROTECTIVE EQUIPMENT FOR FIRE FIGHTING :

In case of fire, wear a full face positive-pressure self contained breathing apparatus and protective suit.



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6. ACCIDENTAL RELEASE MEASURES

PERSONAL PRECAUTIONS :

Restrict access to area as appropriate until clean-up operations are complete. Ensure clean-up is conducted by trained personnel only. Ventilate spill area if possible. Do not touch spilled material. Stop or reduce any leaks if it is safe to do so. Use personal protective equipment recommended in Section 8 (Exposure Controls/Personal Protection). Notify appropriate government, occupational health and safety and environmental authorities.

METHODS FOR CLEANING UP :

SMALL SPILLS: Soak up spill with absorbent material. Place residues in a suitable, covered, properly labeled container. Wash affected area. **LARGE SPILLS:** Contain liquid using absorbent material, by digging trenches or by diking. Reclaim into recovery or salvage drums or tank truck for proper disposal. Wash site of spillage thoroughly with water. Contact an approved waste hauler for disposal of contaminated recovered material. Dispose of material in compliance with regulations indicated in Section 13 (Disposal Considerations).

ENVIRONMENTAL PRECAUTIONS :

Do not contaminate surface water.

7. HANDLING AND STORAGE

HANDLING :

Do not take internally. Do not get in eyes, on skin, on clothing. Have emergency equipment (for fires, spills, leaks, etc.) readily available. Ensure all containers are labelled. Keep the containers closed when not in use. Use with adequate ventilation.

STORAGE CONDITIONS :

Store the containers tightly closed. Store in suitable labelled containers.

SUITABLE CONSTRUCTION MATERIAL :

HDPE (high density polyethylene), Stainless Steel 304, Compatibility with Plastic Materials can vary; we therefore recommend that compatibility is tested prior to use.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

OCCUPATIONAL EXPOSURE LIMITS :

This product does not contain any substance that has an established exposure limit.

ENGINEERING MEASURES :

General ventilation is recommended.

RESPIRATORY PROTECTION :

Respiratory protection is not normally needed. Respiratory protection is not normally needed. **FULL-FACE MASK WITH WHITE CARTRIDGE**

HAND PROTECTION :

Neoprene gloves, Nitrile gloves, Butyl gloves, PVC gloves **NEOPRENE, NITRILE, NATURAL RUBBER OR PVC GLOVES NEOPRENE, NITRILE, NATURAL RUBBER OR PVC GLOVES, SLICKER SUIT, RUBBER BOOTS**

**MATERIAL SAFETY DATA SHEET****PRODUCT****MSW-101****EMERGENCY TELEPHONE NUMBER(S)****(800) 424-9300 (24 Hours) CHEMTREC****SKIN PROTECTION :**

Wear standard protective clothing.

EYE PROTECTION :

Wear chemical splash goggles. CHEMICAL GOGGLES

HYGIENE RECOMMENDATIONS :

If clothing is contaminated, remove clothing and thoroughly wash the affected area. Launder contaminated clothing before reuse. Keep an eye wash fountain available. Keep a safety shower available.

9. PHYSICAL AND CHEMICAL PROPERTIES

PHYSICAL STATE Liquid

APPEARANCE Colorless Clear

ODOR None

SPECIFIC GRAVITY 1.35 @ 77 °F / 25 °C

DENSITY 11.2 lb/gal

SOLUBILITY IN WATER Complete

pH (100 %) 4.7 - 5.3

BOILING POINT 212 °F / 100 °C Minimum

VAPOR PRESSURE Same as water

VOC CONTENT 0 % Calculated

Note: These physical properties are typical values for this product and are subject to change.

10. STABILITY AND REACTIVITY**STABILITY :**

Stable under normal conditions.

HAZARDOUS POLYMERIZATION :

Hazardous polymerization will not occur.

CONDITIONS TO AVOID :

Freezing temperatures.

MATERIALS TO AVOID :

Contact with strong alkalis (e.g. ammonia and its solutions, carbonates, sodium hydroxide (caustic), potassium hydroxide, calcium hydroxide (lime), cyanide, sulfide, hypochlorites, chlorites) may generate heat, splattering or boiling and toxic vapors.

HAZARDOUS DECOMPOSITION PRODUCTS :

Under fire conditions: Oxides of phosphorus, Oxides of sodium

**MATERIAL SAFETY DATA SHEET****PRODUCT****MSW-101****EMERGENCY TELEPHONE NUMBER(S)****(800) 424-9300 (24 Hours) CHEMTREC****11. TOXICOLOGICAL INFORMATION**

No toxicity studies have been conducted on this product.

SENSITIZATION :

This product is not expected to be a sensitizer.

CARCINOGENICITY :

None of the substances in this product are listed as carcinogens by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP) or the American Conference of Governmental Industrial Hygienists (ACGIH).

12. ECOLOGICAL INFORMATION**ECOTOXICOLOGICAL EFFECTS :**

No toxicity studies have been conducted on this product.

MOBILITY :

High phosphate levels in surface water can cause eutrophication with subsequent algal blooms and oxygen depletion.

BIOACCUMULATION POTENTIAL

This preparation or material is not expected to bioaccumulate.

If released into the environment, see CERCLA/SUPERFUND in Section 15.

13. DISPOSAL CONSIDERATIONS

If this product becomes a waste, it is not a hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA) 40 CFR 261, since it does not have the characteristics of Subpart C, nor is it listed under Subpart D.

As a non-hazardous waste, it is not subject to federal regulation. Consult state or local regulation for any additional handling, treatment or disposal requirements. For disposal, contact a properly licensed waste treatment, storage, disposal or recycling facility.

14. TRANSPORT INFORMATION

The information in this section is for reference only and should not take the place of a shipping paper (bill of lading) specific to an order. Please note that the proper Shipping Name / Hazard Class may vary by packaging, properties, and mode of transportation. Typical Proper Shipping Names for this product are as follows.

LAND TRANSPORT :

Proper Shipping Name :

**PRODUCT IS NOT REGULATED DURING
TRANSPORTATION**

**MATERIAL SAFETY DATA SHEET****PRODUCT****MSW-101****EMERGENCY TELEPHONE NUMBER(S)****(800) 424-9300 (24 Hours) CHEMTREC****AIR TRANSPORT (ICAO/IATA) :**

Proper Shipping Name :

**PRODUCT IS NOT REGULATED DURING
TRANSPORTATION****MARINE TRANSPORT (IMDG/IMO) :**

Proper Shipping Name :

**PRODUCT IS NOT REGULATED DURING
TRANSPORTATION****15. REGULATORY INFORMATION****NATIONAL REGULATIONS, USA :****OSHA HAZARD COMMUNICATION RULE, 29 CFR 1910.1200 :**

Based on our hazard evaluation, none of the substances in this product are hazardous.

CERCLA/SUPERFUND, 40 CFR 117, 302 :

Notification of spills of this product is not required.

SARA/SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 (TITLE III) - SECTIONS 302, 311, 312, AND 313 :**SECTION 302 - EXTREMELY HAZARDOUS SUBSTANCES (40 CFR 355) :**

This product does not contain substances listed in Appendix A and B as an Extremely Hazardous Substance.

SECTIONS 311 AND 312 - MATERIAL SAFETY DATA SHEET REQUIREMENTS (40 CFR 370) :

Our hazard evaluation has found that this product is not hazardous under 29 CFR 1910.1200.

- Immediate (Acute) Health Hazard
- Delayed (Chronic) Health Hazard
- Fire Hazard
- Sudden Release of Pressure Hazard
- Reactive Hazard

Under SARA 311 and 312, the EPA has established threshold quantities for the reporting of hazardous chemicals. The current thresholds are: 500 pounds or the threshold planning quantity (TPQ), whichever is lower, for extremely hazardous substances and 10,000 pounds for all other hazardous chemicals.

SECTION 313 - LIST OF TOXIC CHEMICALS (40 CFR 372) :

This product does not contain substances on the List of Toxic Chemicals.

TOXIC SUBSTANCES CONTROL ACT (TSCA) :

The substances in this preparation are included on or exempted from the TSCA 8(b) Inventory (40 CFR 710)

NSF INTERNATIONAL :

This product has received NSF/International certification under ANSI/NSF Standard 60 in the corrosion and scale control and sequestering categories. The official name is "Blended Corrosion Inhibitor." Maximum product application dosage is : 34 mg/l.

**MATERIAL SAFETY DATA SHEET****PRODUCT****MSW-101****EMERGENCY TELEPHONE NUMBER(S)****(800) 424-9300 (24 Hours) CHEMTREC**

FEDERAL WATER POLLUTION CONTROL ACT, CLEAN WATER ACT, 40 CFR 401.15 / formerly Sec. 307, 40 CFR 116.4 / formerly Sec. 311 :

This product contains the following substances listed in the regulation:

Substance(s)	Citations
• Sodium Phosphate, Tribasic	Sec. 311

CLEAN AIR ACT, Sec. 111 (40 CFR 60, Volatile Organic Compounds), Sec. 112 (40 CFR 61, Hazardous Air Pollutants), Sec. 602 (40 CFR 82, Class I and II Ozone Depleting Substances) :

None of the substances are specifically listed in the regulation.

CALIFORNIA PROPOSITION 65 :

This product does not contain substances which require warning under California Proposition 65.

MICHIGAN CRITICAL MATERIALS :

None of the substances are specifically listed in the regulation.

STATE RIGHT TO KNOW LAWS :

The following substances are disclosed for compliance with State Right to Know Laws:

Sodium Phosphate, Tribasic

7601-54-9

NATIONAL REGULATIONS, CANADA :

WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS) :

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all the information required by the CPR.

WHMIS CLASSIFICATION :

Not considered a WHMIS controlled product.

CANADIAN ENVIRONMENTAL PROTECTION ACT (CEPA) :

The substances in this preparation are listed on the Domestic Substances List (DSL), are exempt, or have been reported in accordance with the New Substances Notification Regulations.

16. OTHER INFORMATION

This product material safety data sheet provides health and safety information. The product is to be used in applications consistent with our product literature. Individuals handling this product should be informed of the recommended safety precautions and should have access to this information. For any other uses, exposures should be evaluated so that appropriate handling practices and training programs can be established to insure safe workplace operations. Please consult your local sales representative for any further information.

REFERENCES

Nalco Company 1601 W. Diehl Road • Naperville, Illinois 60563-1198

(630)305-1000

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MATERIAL SAFETY DATA SHEET

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Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices, American Conference of Governmental Industrial Hygienists, OH., (Ariel Insight# CD-ROM Version), Ariel Research Corp., Bethesda, MD.

Hazardous Substances Data Bank, National Library of Medicine, Bethesda, Maryland (TOMES CPS# CD-ROM Version), Micromedex, Inc., Englewood, CO.

IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Man, Geneva: World Health Organization, International Agency for Research on Cancer.

Integrated Risk Information System, U.S. Environmental Protection Agency, Washington, D.C. (TOMES CPS# CD-ROM Version), Micromedex, Inc., Englewood, CO.

Annual Report on Carcinogens, National Toxicology Program, U.S. Department of Health and Human Services, Public Health Service.

Title 29 Code of Federal Regulations, Part 1910, Subpart Z, Toxic and Hazardous Substances, Occupational Safety and Health Administration (OSHA), (Ariel Insight# CD-ROM Version), Ariel Research Corp., Bethesda, MD.

Registry of Toxic Effects of Chemical Substances, National Institute for Occupational Safety and Health, Cincinnati, OH, (TOMES CPS# CD-ROM Version), Micromedex, Inc., Englewood, CO.

Ariel Insight# (An integrated guide to industrial chemicals covered under major regulatory and advisory programs), North American Module, Western European Module, Chemical Inventories Module and the Generics Module (Ariel Insight# CD-ROM Version), Ariel Research Corp., Bethesda, MD.

The Teratogen Information System, University of Washington, Seattle, WA (TOMES CPS# CD-ROM Version), Micromedex, Inc., Englewood, CO.

Prepared By : Product Safety Department

Date issued : 02/26/2004

Version Number : 1.6

MSW-101

Corrosion and Deposit Inhibitor

PRODUCT DESCRIPTION AND APPLICATION

MSW-101 corrosion and deposit Inhibitor is a liquid inhibitor formulated to control corrosion and scale build-up in municipal water systems, industrial service water, or cooling water systems.

PHYSICAL & CHEMICAL PROPERTIES

These properties are typical. Refer to the Material Safety Data Sheet (MSDS), SECTION 9, for the most current data.

Appearance	Clear, Colorless
Physical State	Liquid
Density @ 77°F (25°C)	11.2 lb/gal (1.35 Kg/L)
Specific Gravity@ 77°F (25°C)	1.35
pH (Neat)	4.7 - 5.3
Freeze Point	Not Available
Viscosity	Not Available
Flash Point	None
Solubility in Water	complete
Vapor Pressure	same as water
Odor	None
Boiling Point	212°F (100°C)
VOC content	0% as calculated

ACTIVE CONSTITUENTS

Active	Function
Orthophosphate	Corrosion Inhibitor
Sodium Hexametaphosphate	Scale/corrosion Inhibitor

REGULATORY APPROVALS

NSF INTERNATIONAL: This product has received NSF/International certification under ANSI/NSF Standard 60 in the corrosion and scale control and sequestering categories. The official name is "Blended Corrosion Inhibitor." Maximum product application dosage is: 33 mg/l. Only product manufactured at Plant 11 USA and whose container label bears the ANSI/NSF Mark may be used in potable water treatment applications.

MATERIALS OF COMPATIBILITY

Compatible

High Density Polyethylene
Crosslinked Polyethylene
Low Density Polyethylene
EPDM
FRP (Bisphenol)
Neoprene
Viton
Stainless Steel 316
Stainless Steel 304
Polypropylene
PVC
CPVC
Kynar
Hypalon

Not Compatible

Carbon steel
Buna-N
FRP (Isophthalic)
Plasite 7122 (epoxy)
Plasite 4100 (vinyl ester)
Silicone 65

DOSAGE AND FEEDING

For complete dosage and feeding recommendations, consult your Nalco representative.

MSW-101 should be fed via a closed feed system. A closed feed system is defined as a system in which fluid is moved from a closed storage vessel into a treated media without exposure to the atmosphere except through normal venting or pressure relief devices.

ENVIRONMENTAL AND TOXICITY DATA

Biological Oxygen Demand (5-day BOD ₅)	Not Available
Chemical Oxygen Demand (COD)	Not Available
Total Organic Carbon (TOC)	Not Available

Refer to SECTIONS 11 and 12 of the MSDS for all available mammalian and aquatic toxicity information.

SAFETY AND HANDLING

Chemical resistant gloves and safety goggles should be worn when handling **MSW-101**. Before handling **MSW-101**, read SECTION 8 of the MSDS for specific personal protective equipment (PPE) recommendations and SECTION 3 for health effects information.

STORAGE

MSW-101 should be stored in a location where the product can be maintained between 32°F (0°C) and 110°F (43°C). Recommended in-plant storage limit is 1 year.

REMARKS

If you need assistance or more information on this product, please call your nearest Nalco Representative. For more news about Nalco Company, visit our website at www.nalco.com.

For **Medical and Transportation Emergencies** involving Nalco products, please see the Material Safety Data Sheet for the phone number.

ADDITIONAL INFORMATION

NALCO is a registered trademark of Nalco Company (10-27-04)

Nalco Company, 1601 West Diehl Road, Naperville, Illinois 60563-1196

Subsidiaries and Affiliates in Principle Locations Around the World

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