



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-14-011

April 25, 2014

10 CFR 50.4

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Sequoyah Nuclear Plant, Units 1 and 2
Facility Operating Licenses Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Subject: **Change in Commitment Related to External Flooding Concerns
(TAC Nos. ME8805, ME8806 and ME8807)**

- References:
1. Letter from TVA to NRC, "Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant, Units 1 and 2, and Watts Bar Nuclear Plant, Unit 1," dated June 13, 2012 (ADAMS Accession No. ML12165A186)
 2. Letter from NRC to TVA, "Confirmatory Action Letter - Watts Bar Nuclear Plant, Unit 1, and Sequoyah Nuclear Plant, Units 1 and 2, Commitments to Address External Flooding Concerns (TAC NOS. ME8805, ME8806, and ME8807)," dated June 25, 2012 (ADAMS Accession No. ML12165A527)

By letter dated June 13, 2012 (Reference 1), the Tennessee Valley Authority (TVA) provided to the Nuclear Regulatory Commission (NRC) a list of commitments related to TVA's updated hydrologic analysis for Sequoyah Nuclear Plant (SQN), Units 1 and 2, and Watts Bar Nuclear Plant (WBN), Unit 1. On June 25, 2012, the NRC issued to TVA a Confirmatory Action Letter (Reference 2) regarding these commitments. Reference 2 requires TVA to notify the NRC if, for any reason, the actions cannot be completed within the specified schedule and to advise the NRC in writing of TVA's modified schedule in advance of the change.

The purpose of this letter is to notify the NRC that TVA cannot complete a portion of the actions within the specified schedule for Commitment 14 of Reference 2 and to provide the modified schedule for the commitment. This letter also provides a written update of the 16 commitments described in Reference 2.

Commitment 14 of Reference 2 states the following.

TVA will implement permanent modifications to prevent overtopping of the embankments of the Fort Loudoun dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS). Based on the current NEPA EIS schedule, these permanent modifications are scheduled to be installed by October 31, 2015.

In order to complete the planned modifications to Fort Loudoun Dam by October 31, 2015, closure of traffic on highway U.S. 321 is required because approximately 1900 feet of the 4500 feet planned for modification is located directly adjacent to the highway (Enclosure 1, Attachments 1 and 2). Closure of highway U.S. 321 to facilitate dam modifications would significantly impact emergency service response and disrupt commercial and residential traffic. A complete shutdown of highway U.S. 321 during dam modification would require a detour in excess of 50 miles for the emergency service response vehicles and commercial/residential traffic that normally use highway U.S. 321.

Tennessee Department of Transportation (TDOT) is currently constructing a new highway U.S. 321 bridge across the Tennessee River to reroute traffic away from the Fort Loudoun Dam (Enclosure 1, Attachment 3). The TDOT project also closes the approach roads to Fort Loudoun Dam which will no longer be used for vehicular traffic. The rerouting of traffic eliminates the need to alter or block traffic flow to accommodate modifications to the Fort Loudoun Dam. The estimated completion date for the TDOT project is December 31, 2016 and it is expected that traffic will be routed to the newly constructed bridge before the completion date.

Enclosure 1 provides the State of Tennessee Department of Transportation to TVA letter, dated January 2, 2014, describing its concerns with traffic flow restrictions on highway U.S. 321 crossing the Fort Loudoun Dam and the project currently in progress to permanently reroute Fort Loudoun Dam traffic.

Therefore, TVA is revising Commitment 14 to extend the implementation date, as follows.

TVA will implement permanent modifications to prevent overtopping of the embankments of the Fort Loudoun dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS). Based on the current NEPA EIS schedule, these permanent modifications are scheduled to be installed by February 1, 2017.

The Tennessee Valley Authority is scheduled to begin modifications to the Fort Loudoun Dam on October 1, 2014. The dam modifications that are not directly adjacent to highway U.S. 321 will be implemented on a schedule that satisfies the original completion date. The modifications to Fort Loudoun Dam that are directly adjacent to highway U.S. 321 (approximately 1900 feet from the east end of the Fort Loudoun Dam bridge to the state road 444 ramps) are being rescheduled for completion after TDOT reroutes traffic to the new bridge and prior to February 1, 2017. The date for completion of the Fort Loudoun Dam modification is extended by this letter to coordinate with TDOT construction activities.

April 25, 2014

The design life of the HESCO barrier geotextile liner is published as five years based on retaining one-half of its original tensile strength after accelerated ultraviolet (UV) radiation exposure. The installation of HESCO barriers at the Fort Loudoun Dam began on November 1, 2009, and was completed on February 15, 2010. This 1900 feet section of HESCO barriers adjacent to highway U.S. 321 will remain in place until traffic has been rerouted to the new bridge.

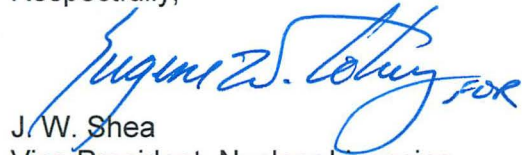
HESCO produces pre-fabricated like-for-like replacement panels designed specifically for damaged barriers that consist of liner geotextile pre-attached to new welded wire fabric. Therefore, to extend the life expectancy of the barriers at the Fort Loudoun Dam for an additional two years (i.e., to February 1, 2017), these replacement panels will be added to shield the geotextile liner from further UV exposure and prolong the life of the HESCO barrier. The existing exterior-facing flood side panel of each of the HESCO barriers will be left in place and a new pre-fabricated HESCO like-for-like replacement panel will be fitted on the outside and attached with joining pins. The additional new outer panel installed over the existing panel will provide the necessary structural restriction for required performance of the barrier and shield the existing inner panel from additional UV exposure. Installation of the new exterior panels is scheduled for completion by December 31, 2014.

Tennessee Valley Authority will continue to conduct the temporary modification inspections described in Commitment 7 of Reference 2 for Fort Loudoun Dam until the permanent modifications are completed.

Enclosure 2 provides the revised Commitment 14. Enclosure 3 provides a status update of the sixteen commitments described in Reference 2.

If you have questions regarding this update, please contact Edward D. Schroll at (423) 751-3850.

Respectfully,



J. W. Shea
Vice President, Nuclear Licensing

- Enclosures:
1. Tennessee Department of Transportation Letter Regarding Fort Loudoun Dam Bridge.
 2. Revised Regulatory Commitment
 3. Updated Status of the Commitments Associated With Confirmatory Action Letter No. NRR-12-001

cc (Enclosures):

NRC Regional Administrator - Region II
NRR Director - NRC Headquarters
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRR Project Manager - Sequoyah Nuclear Plant
NRR Project Manager - Watts Bar Nuclear Plant, Unit 1

**TENNESSEE DEPARTMENT OF TRANSPORTATION LETTER
REGARDING FORT LOUDOUN DAM BRIDGE**



**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION**

REGION 1
P. O. BOX 58
KNOXVILLE, TENNESSEE 37901
(865) 594-2400

JOHN C. SCHROER
COMMISSIONER

BILL HASLAM
GOVERNOR

January 2, 2014

Mr. Samuel B. Vinson, P.G.
Manager
Generation Construction
1101 Market Street, LP 5N 306, G-C
Chattanooga, TN 37402-2632

Dear Mr. Vinson:

I would like to thank you for the project update regarding your agency's coordination with the Nuclear Regulatory Control. After consideration of the schedule for the project, the Tennessee Department of Transportation (TDOT) is in agreement with TVA's request to the Nuclear Regulatory Control for a time extension concerning major roadway elevation changes to U.S. 321 in Loudon County.

TDOT's mission is to provide a safe and reliable transportation system for people, goods, and services that support economic prosperity in Tennessee. U.S. 321 in the vicinity of Ft. Loudoun Dam experiences higher daily traffic counts than other state routes in Loudon County. The most current traffic counts indicate that 20,553 motorists travel U.S. 321 daily, so the closure of the route leads to several concerns by the Department.

- Loudon County EMS reports an average of 80 fire/ambulance/police responses for the residents located east of the U.S. 321 bridge in Loudon County. Residents requiring emergency medical assistance are transported across the bridge to an area hospital in Lenoir City or Knoxville. The detour route required for a full closure of U.S. 321 in this location would significantly increase the time for ambulances to transport patients to area hospitals. The shortest available detour route increases travel by more than 50 miles and travel times in excess of one hour.
- The closure of U.S. 321 would greatly affect the movement of goods and services by commercial motorists that use the bridge corridor daily. Local industry leaders in manufacturing would see economic impacts due to increased travel times for delivery.

Mr. Samuel B. Vinson, P.G.
January 2, 2014
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- The U.S. 321 corridor is a major artery for tourism into the Great Smoky Mountains, and Sevier and Blount County tourist attractions from Interstate 40 and Interstate 75. Messaging of the closure would be of great concern due to the number of unfamiliar motorists that travel the corridor wishing to access the tourism areas.

Currently, the Department has a project underway to construct a new bridge across the Tennessee River. The project began in August 2012 and has an estimated completion date of December 2016. The project includes the construction of a new bridge, which will remove all traffic from the current U.S. 321 bridge located on the TVA Fort Loudon Dam and away from Fort Loudon Lake embankments. Once the project has progressed to the point where traffic can be moved to the newly constructed bridge, the elevation changes that TVA must construct will not affect the motoring public.

The Department appreciates any consideration by the NRC to allow TVA to delay the proposed work on U.S. 321. Delaying the TVA project until the Department's current bridge project is complete would eliminate the noted concerns. If you have questions or need additional information, please contact me at (865) 594-2400 or at steve.borden@tn.gov.

Sincerely,



Steven M. Borden, P.E.
Director/Assistant Chief Engineer

SMB/AS/plb

C: Mr. Tommy Slaton



**Section of Fort Loudoun Dam
Attachment 1**



**View of HESCO Barriers Adjacent to U. S. 321 in the 1990 Foot Section Showing
Limited Work Area
Attachment 2**



**TDOT Project Traffic Route
Attachment 3**

ENCLOSURE 2

REVISED REGULATORY COMMITMENT

Commitment 14

The Tennessee Valley Authority will implement permanent modifications to prevent overtopping of the embankments of the Fort Loudoun dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS). Based on the current NEPA EIS schedule, these permanent modifications are scheduled to be installed by February 1, 2017.

ENCLOSURE 3

**UPDATED STATUS OF THE COMMITMENTS ASSOCIATED WITH
CONFIRMATORY ACTION LETTER NO. NRR-12-001**

ENCLOSURE 3

By Confirmatory Action Letter dated June 25, 2012, (ADAMS Accession No. ML12165A186) the NRC confirmed TVA commitments made in the letter from TVA to NRC, "Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant (SQN), Units 1 and 2, and Watts Bar Nuclear Plant (WBN), Unit 1," dated June 13, 2012 (ADAMS Accession No. ML12165A186). This enclosure provides a written status of the 16 commitments described in the Confirmatory Action Letter.

Commitment 1 (Completed)

TVA will submit a License Amendment Request to update the WBN, Unit 1 Updated Final Safety Analysis Report to reflect the updated hydrologic analysis methods and results, including the analysis of the rim leakage paths discussed at the May 31, 2012, public meeting between TVA and NRC staff.

Letter from TVA to NRC, "Application to Revise Watts Bar Nuclear Plant Unit 1 Updated Final Safety Analysis Report Regarding Changes to Hydrologic Analysis, TAC No. ME8200 (WBN-UFSAR-12-01)," dated July 19, 2012 submitted. (ADAMS Accession No. ML122360173)

Commitment 2 (Completed)

TVA will submit a License Amendment Request to update the SQN, Units 1 and 2, Updated Final Safety Analysis Report to reflect the updated hydrologic analysis methods and results, including the analysis of the rim leakage paths discussed at the May 31, 2012, public meeting between TVA and NRC staff.

Letter from TVA to NRC, "Application to Revise Sequoyah Nuclear Plant Units 1 and 2 Updated Final Safety Analysis Report Regarding Changes to Hydrologic Analysis, (SQN-TS-12-02)," dated August 10, 2012 submitted. (ADAMS Accession Nos. ML12226A561, ML12226A562 and ML12226A563)

Commitment 3 (Completed)

TVA will issue and initially perform a procedure for a semi-annual inspection of the compensatory measure for flood protection of the WBN, Unit 1 Thermal Barrier Booster pumps and motors. The inspection will verify:

- a. The condition of the permanent building attachments; and*
- b. The inventory, storage, physical protection, and condition of the materials and consumables required for erection of the temporary flood protection panels during a postulated PMF [probable maximum flood] event.*

Inspections will continue until the compensatory measure is replaced by a permanent plant modification.

Commitment 3 was partially satisfied by implementation of 1-TI-52.002, "Inspection Procedure for TVA Commitments Related to Updated Hydrologic Analysis Results Watts Bar Nuclear Plant Unit 1" on August 24, 2012. Continued adherence (inspection requirements) to Commitment 3 was tied to the completion of Commitment 8.

TVA informed the NRC of the completion of Commitment 8 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013. (ADAMS Accession No. ML13126A101) and the inspections required by Commitment 3 were no longer required.

ENCLOSURE 3

Commitment 4 (Completed)

TVA will issue and initially perform a procedure for a semi-annual inspection to verify the condition of the SQN, Units 1 and 2, Spent Fuel Pit Cooling Pump Enclosure caps. Inspections will continue until the design change is completed to document the SQN, Units 1 and 2, Spent Fuel Pit Cooling Pump Enclosure caps as a permanent plant feature.

Commitment 4 was partially satisfied by implementation of 0-TI-DEC-000-001.0, "Inspection Procedure for TVA Commitments Related to Updated Hydrologic Analysis Results Sequoyah Nuclear Plant Unit 1 & Unit 2," on August 23, 2012. Continued adherence (inspection requirements) to Commitment 4 was tied to the completion of Commitment 11.

TVA informed the NRC of the completion of Commitment 11 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013. (ADAMS Accession No. ML13126A101) and the inspections required by Commitment 4 were no longer required.

Commitment 5 (Completed)

TVA will issue and initially perform a procedure for a semiannual inspection to verify the inventory, storage, physical protection, and condition of the materials and consumables required to implement the compensatory measure for the common SQN, Units 1 and 2, Diesel Generator Building. Inspections will continue until the compensatory measure is replaced by a permanent plant modification.

Commitment 5 was partially satisfied by implementation of 0-TI-DEC-000-001.0, "Inspection Procedure for TVA Commitments Related to Updated Hydrologic Analysis Results Sequoyah Nuclear Plant Unit 1 & Unit 2," on August 28, 2012. Continued adherence (inspection requirements) to Commitment 5 was tied to the completion of Commitment 10.

TVA informed the NRC of the completion of Commitment 10 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13126A101) and the inspections required by Commitment 5 were no longer required.

Commitment 6 (Completed)

TVA will perform an analysis of the Design Basis Flood for SQN, Units 1 and 2, and WBN, Unit 1 that assumes a failure of a section of the HESCO flood barriers [sand baskets] and earthen embankments at Fort Loudon, Cherokee, Tellico, and Watts Bar dams.

Commitment 6 was satisfied by analysis documented in the Barnes, Wagner, Sumner & Cannon Memorandum, "Results of SOCH Simulations with Breach Embankments for WBN and SQN," dated August 29, 2012. An additional requirement (located in the body of the Confirmatory Action Letter) to provide a summary of the analysis results within 60 days of its completion was satisfied by letter from TVA to NRC, "Impact of Potential Breaches of HESCO Modular Barriers and Earthen Embankments on the Updated Hydrological Analysis Results for Sequoyah Nuclear Plant, Units 1 and 2, and Watts Bar Nuclear Plant, Unit 1," dated October 30, 2012 (ADAMS Accession No. ML12307A227).

ENCLOSURE 3

Commitment 7 (Partially Completed)

TVA's Nuclear Power Group will issue and initially perform procedures for semi-annual inspections of the temporary HESCO flood barriers installed at Cherokee, Fort Loudon, Tellico, and Watts Bar reservoirs. These inspections will:

- a. Ensure the temporary HESCO flood barriers remain in place and are not structurally degraded as specified by the manufacturer's written specifications and recommendations;*
- b. Verify the inventory and staging of the material required to fill the gaps that exist; and,*
- c. Ensure that adequate physical security (e.g., fences and locks) is provided for the staged material against theft.*

These inspections will continue until a permanent modification is implemented to prevent overtopping the Cherokee, Fort Loudon, Tellico, and Watts Bar dams due to the Probable Maximum Flood.

Commitment 7 is tied to the completion of Commitments 13, 14, 15, and 16. Commitment 7 has been partially satisfied by the implementation of NPG-NETP-121, "Inspection of Dam Temporary Modular Flood Barriers (WBH, FLH, TEC, and CRH)," on August 23, 2012. The commitment to perform inspections of the HESCO barriers will remain in effect until the permanent dam modifications committed to in Commitments 13, 14, 15, and 16 are complete allowing HESCO barrier removal.

Commitment 8 (Completed)

TVA will install a permanent plant modification to provide flood protection with respect to the Design Basis Flood level for WBN, Unit 1 Thermal Barrier Booster pumps and motors.

Commitment 8 was satisfied by the installation of permanent flood barrier walls at the WBN Unit 1 Thermal Barrier Booster Pumps by DCN 54018-B. The NRC was informed of the completion of Commitment 8 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13126A101). The letter also informed the NRC that the inspection requirements described in Commitment 3 were no longer required.

Commitment 9 (Completed)

TVA will install a permanent plant modification to provide flood protection with respect to the Design Basis Flood level for WBN, Unit 1 Spent Fuel Pit Cooling pumps and motors.

Commitment 9 was satisfied by the installation of a permanent flood barrier wall for the Spent Fuel Pit and Skimmer Pumps by DCN 54018-B (Stage 3). The NRC was informed of the completion of Commitment 9 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13126A101).

ENCLOSURE 3

Commitment 10 (Completed)

TVA will install a permanent plant modification to provide flood protection with respect to the Design Basis Flood level for the common SON, Units 1 and 2, Diesel Generator Building.

Commitment 10 was satisfied by the installation of flood protection barriers in the Diesel Generator Building by DCN 22404. The NRC was informed of the completion of Commitment 10 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13126A101). The letter also informed the NRC that the compensatory inspection requirements described in Commitment 5 were no longer required.

Commitment 11 (Completed)

TVA will implement the design change to document the SON, Units 1 and 2, Spent Fuel Pit Cooling Pump Enclosure caps as a permanent plant feature.

Commitment 11 was satisfied by the modifications to the Spent Fuel Pit Cooling Pump Platform watertight requirements by DCN 22404. The NRC was informed of the completion of Commitment 11 in a letter from TVA to NRC, "Completion of Commitments Related to Updated Hydrologic Analysis Results for Sequoyah Nuclear Plant Units 1 and 2 and Watts Bar Nuclear Plant Unit 1 (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13126A101). The letter also informed the NRC that the compensatory inspection requirements described in Commitment 4 were no longer required.

Commitment 12 (Completed)

TVA will provide the results of the evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) Status to define the permanent modifications to prevent overtopping the embankments of the Cherokee, Fort Loudon, Tellico, and Watts Bar dams.

The Tennessee Valley Authority informed the NRC of a due date extension for Commitment 12 in a letter from TVA to NRC, "Updated Commitment Related to Prevention of Overtopping of Embankments for Cherokee, Fort Loudoun, Tellico, and Watts Bar Dams (TAC Nos. ME8805, ME8806, and ME8807)," dated April 29, 2013 (ADAMS Accession No. ML13123A162).

Commitment 12 was satisfied by signing the Record of Decision for the Final Environmental Impact Statement (FEIS) by TVA on July 2, 2013. The NRC was informed of the completion of Commitment 12 in a letter from TVA to NRC, "Completion of Commitment Related to Prevention of Overtopping of Embankments for Cherokee, Fort Loudoun, Tellico, and Watts Bar Dams (TAC Nos. ME8805, ME8806, and ME8807)," dated July 19, 2013 (ADAMS Accession No. ML13205A173).

Commitment 13 (Open)

TVA will implement permanent modifications to prevent overtopping of the embankments of the Cherokee Dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS).

The final solution for the permanent modifications to prevent overtopping of the embankments of the Cherokee Dam was addressed in the FEIS (discussed in Commitment 12).

ENCLOSURE 3

Implementation of the permanent modification to the Cherokee Dam that satisfies Commitment 13 is on track for completion by the due date of October 31, 2015.

Commitment 14 (Open)

TVA will implement permanent modifications to prevent overtopping of the embankments of the Fort Loudon Dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS).

The final solution for the permanent modifications to prevent overtopping of the embankments of the Fort Loudoun Dam was addressed in the FEIS (discussed in Commitment 12).

Construction plans for the Fort Loudoun dam modifications are on track with work scheduled to begin October 1, 2014. Traffic flow would be negatively affected by work on a 1900 foot section of the dam that is directly adjacent to highway U. S. 321. Therefore, TVA is informing the NRC of an extension of the commitment completion date to February 1, 2017 in order to accommodate Tennessee Department of Transportation Department concerns with traffic flow on the highway. Modifications to the other portions of Fort Loudoun Dam will be finished by the original committed completion date of October 31, 2015.

Commitment 15 (Open)

TVA will implement permanent modifications to prevent overtopping of the embankments of the Tellico Dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS).

The final solution for the permanent modifications to prevent overtopping of the embankments of the Tellico Dam was addressed in the FEIS (discussed in Commitment 12).

Implementation of the permanent modification to the Tellico Dam that satisfies Commitment 15 is on track for completion by the committed due date of October 31, 2015.

Commitment 16 (Open)

TVA will implement permanent modifications to prevent overtopping of the embankments of the Watts Bar Dam due to the Probable Maximum Flood. The final solution will be established in an evaluation conducted in compliance with the National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS).

The final solution for the permanent modifications to prevent overtopping of the embankments of the Watts Bar Dam was addressed in the FEIS (discussed in Commitment 12).

Implementation of the permanent modification to the Watts Bar Dam that satisfies Commitment 16 is on track for completion by the committed due date of October 31, 2015.