

**From:** Robert Alexander <Robert.Alexander@tn.gov>  
**Sent:** Monday, May 19, 2014 8:42 AM  
**To:** Drucker, David  
**Subject:** RE: Request assistance documenting the Sequoyah Nuclear Plant NPDES and stormwater permits are administratively continued

Although TN regulations do not specifically address this, EPA rules at 40 CFR 122.6 *Continuation of expiring permits* states:

(d) *State continuation.* (1) An EPA issued permit does not continue in force beyond its expiration date under Federal law if at that time a State is the permitting authority. **States** authorized to administer the NPDES program **may continue** either EPA or **State-issued permits** until the effective date of the new permits, if State law allows. Otherwise, the facility or activity is operating without a permit from the time of expiration of the old permit to the effective date of the State-issued new permit.

Obviously, EPA has delegated TN the authority to implement these rules and thus, both these permits are administratively continued.

Hope this helps.

**Bob Alexander**  
NPDES Permit Writer  
Division of Water Resources  
TN Dept. of Environment and Conservation  
615-532-0659 office  
615-519-7787 cell  
[Robert.alexander@tn.gov](mailto:Robert.alexander@tn.gov)

-----  
We accept and encourage electronic document submittals.

---

**From:** Drucker, David [<mailto:David.Drucker@nrc.gov>]  
**Sent:** Friday, May 16, 2014 3:00 PM  
**To:** Robert Alexander  
**Subject:** RE: Request assistance documenting the Sequoyah Nuclear Plant NPDES and stormwater permits are administratively continued

**Hi Bob,**  
**Did you send something yesterday? I did not receive it.**  
**Thanks,**  
**David**

---

**From:** Robert Alexander [<mailto:Robert.Alexander@tn.gov>]  
**Sent:** Thursday, May 15, 2014 8:23 AM  
**To:** Drucker, David  
**Subject:** RE: Request assistance documenting the Sequoyah Nuclear Plant NPDES and stormwater permits are administratively continued

No problem, Dave – get you something later today.  
Bob

**Bob Alexander**

NPDES Permit Writer

Division of Water Resources

TN Dept. of Environment and Conservation

615-532-0659 office

615-519-7787 cell

[Robert.alexander@tn.gov](mailto:Robert.alexander@tn.gov)

-----  
We accept and encourage electronic document submittals.

---

**From:** Drucker, David [<mailto:David.Drucker@nrc.gov>]

**Sent:** Wednesday, May 14, 2014 7:32 PM

**To:** Robert Alexander

**Subject:** Request assistance documenting the Sequoyah Nuclear Plant NPDES and stormwater permits are administratively continued

**Hi Bob,**

**I am David Drucker with the U.S. Nuclear Regulatory Commission. I am the project manager for the Sequoyah Nuclear Plant (SQN) license renewal application environmental review.**

**Need your help to find documentation that the SQN NPDES permit (attached) is “administratively continued”.**

**Also, need your help to find documentation that the SQN Stormwater multi-sector general permit TNR 050015 is “administratively continued”.**

**Thank you,**

**David**

Senior Project Manager

Division of License Renewal

Office of Nuclear Reactor Regulation

U. S. Nuclear Regulatory Commission

301/415-6223

[david.drucker@nrc.gov](mailto:david.drucker@nrc.gov)