

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

TENNESSEE VALLEY AUTHORITY

(Clinch River Nuclear Site Early Site Permit  
Application)

Docket No. 52-047-ESP

**ORDER**

**(Adopting Proposed Transcript Corrections, Granting Motions Requesting  
Additional Record Corrections and Leave to Submit a Response to FEMA's  
Post-Hearing Letter, Admitting Post-Hearing Exhibits, and Closing the  
Record of the Proceeding)**

The Commission held an evidentiary hearing on the uncontested portion of the captioned proceeding at its Rockville, Maryland headquarters on August 14, 2019. The parties have provided proposed transcript corrections in accordance with the deadline previously set.<sup>1</sup> The transcript corrections identified in Appendix A to this order are adopted.

In addition, the Staff submitted its response to the Commission's post-hearing questions. With its response, the Staff requested to make two corrections to statements made by its witnesses during the evidentiary hearing. As directed, the Staff's submission was filed as a new exhibit using the previously established numbering scheme, and TVA does not object to its admission or the Staff's requested corrections to the record.<sup>2</sup> Pursuant to my authority under 10 C.F.R. § 2.346(a) and (j), I grant the Staff's motion to correct the record and admit exhibit NRC-019 into the evidentiary record.

Both TVA and the Staff have also filed additional exhibits. On August 26, 2019, TVA

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<sup>1</sup> See *Joint Transcript Corrections* (Aug. 23, 2019).

<sup>2</sup> See Ex. NRC-019, NRC Staff Responses to Commission Post-Hearing Questions and Request for Additional Record Corrections (Aug. 28, 2019).

filed a statement containing supplemental information as exhibit TVA-016.<sup>3</sup> On September 5, 2019, the Staff filed a motion requesting leave to submit its response to a post-hearing letter from the Federal Emergency Management Agency (FEMA) as exhibit NRC-020.<sup>4</sup> TVA does not object to the Staff's motion and neither party objects to the admission of these exhibits. Pursuant to my authority under 10 C.F.R. § 2.346(a) and (j), I grant the Staff's motion and admit exhibits TVA-016 and NRC-020 into the evidentiary record.

The adoption of transcript corrections and the admission into evidence of the new exhibits completes the procedural activities that remained pending at the conclusion of the hearing. The record of this proceeding is therefore closed, effective as of the date of this order.

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<sup>3</sup> See Ex. TVA-016, Statement of Daniel P. Stout (Aug. 23, 2019).

<sup>4</sup> See *NRC Staff Motion Requesting Leave to Submit a Response to FEMA's Post-Hearing Letter and Admit Exhibit NRC-020 into the Hearing Record* (Sept. 5, 2019); Ex. NRC-020, NRC Staff Response to FEMA Post-Hearing Letter (Sept. 5, 2019). The Staff's motion and exhibit NRC-020 arise from a letter submitted by FEMA to the Office of the Secretary supplementing FEMA's position in a previous letter and addressing testimony offered during the Clinch River evidentiary hearing. See Letter from Michael S. Casey, FEMA, to Office of the Secretary, NRC (Aug. 24, 2019) (ADAMS accession no. ML19240A938).

This order is issued pursuant to my authority under 10 C.F.R. § 2.346(a) and (j).

IT IS SO ORDERED.

For the Commission

**NRC Seal**

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Annette L. Vietti-Cook  
Secretary of the Commission

Dated at Rockville, Maryland,  
this 13<sup>th</sup> day of September 2019.

APPENDIX A: Changes to the Transcript for the Clinch River ESP Mandatory Hearing  
August 14, 2019

Page	Line	Correction
3	9	Insert "WALTER LEE, Director, Nuclear Emergency Preparedness, TVA"
5	4	Delete line
5	5	Delete line
5	7	Change "168" to "153"
5	8	Insert "Kenneth Erwin ..... 159"
7	11	Change "docket" to "record"
7	18	Delete "again"
7	19	Delete "and look up"
9	10	Change "51.105A" to "51.105(a)"
9	12	Change "1022A, C and E" to "102(2)(A), (C), and (E)"
11	15	Change "not" to "none"
13	8	Change "Phillip" to "Philip"
13	14	Change "hands" to "hand"
14	19	Change "Mr. Spencer" to "Mr. Dreke"
15	20	Change "Commissioner" to "Commissioners"
19	15	Change "maintains" to "maintain"
23	16-17	Change "site mandatory requirements" to "site boundary requirements"
26	2	Change "regulator" to "regulatory"
26	11	Change "was originally submitted has" to "as originally submitted had"
27	5-6	Change "application supplements issues had been resolved" to "application supplements, issues had been resolved"
29	14	Delete "application"
30	5	Change "And it's" to "It's"
31	15	Delete "to - -"
31	17	Change "with" to "to"
34	6	Delete "sort of"
34	9	Insert a comma after "So"
35	25	Change "So you" to "You"
36	2	Delete "of"
36	9	Change "Commission" to "Commissioner"
40	19	Change "efforts or" to "efforts of"
42	15	Change "ESP and" to "ESP, and"
43	12	Change "before" to "be for"
44	24	Change "perimeter" to "parameter"
45	4	Change "designed" to "design"
45	11	Change "perimeter" to "parameter"
48	13	Change "locality" to "inimicality"
48	19	Change "test" to "tests,"
49	16	Change "construction operation" to "construction and operation"
50	16	Change "federal" to "federally"
51	25	Change "as" to "are"
53	12	Change "1022A" to "102(2)(A)"
53	13	Change "uses systematic" to "uses a systematic"
53	17	Change "1022C" to "102(2)(C)"

Page	Line	Correction
53	20	Change “affects” to “effects”
54	4	Change “1022C” to 102(2)(C)”
54	7	Change “1022E” to “102(2)(E)”
57	9	Insert “not” before “unusual”
57	14	Change “Unusual” to “Not unusual”
57	15-22	Change these lines to read as follows: “COMMISSIONER CAPUTO: Not Unusual. It’s not unusual for an ESP applicant that doesn’t plan to build right away. It’s not unusual— MS. BRADFORD: I would agree with that. Great. COMMISSIONER CAPUTO: —to defer consideration of those issues to the COL stage? Okay. Thank you. That was my only question.”
59	3	Insert “when this” before “if”
59	5	Insert “with” after “happened”
59	5	Insert “before that” after “happen”
59	7	Insert “you know” after “merger”
59	16	Change “chief level and” to “chief level in”
60	18	Change “Clint” to “Clinch”
60	21	Delete “that the Agency”
61	5	Change “Clint” to “Clinch”
61	8	Delete “validation of the same”
61	12	Change “prospectus” to “perspective”
62	9	Change “CPL applicant” to “CP applicant”
62	16	Change “in” to “and”
63	1-2	Delete “going to be”
64	4	Delete “I’m” before “TVA”
64	7	Change “ESP” to “ESPA”
64	12	Change “in” to “and”
64	22	Change “only major features emergency plan, with” to “only a major features emergency plan with”
66	16	Change “dose base” to “dose-based”
68	2	Change “planned” to “land”
68	3	Change “It” to “If”
68	12	Change “recognize a formal offsite plants” to “recognize that a formal offsite plan”
69	18	Delete comma after “reduced”
70	15-16	Change “The first refer to as Criteria Alpha. Is that the EPZ” to “The first, referred to as Criteria Alpha, is that the EPZ”
70	19	Insert “(PAG)” after “guide”
70	25	Change “main” to “mean”
71	10	Change “main” to “mean”
71	13	Change “insurance” to “assurance”
72	12-13	Change “in the Chapter 2 of the site safety analysis report. In that, in a future application” to “in Chapter 2 of the Site Safety Analysis Report in that, in a future application”
75	2	Delete commas before and after “plume exposure pathway”
75	3	Change “exemption request” to “exemption requests”
75	11	Change “site. Where” to “site, where”
75	13	Change “core. And” to “core, and”

Page	Line	Correction
76	2	Change "information. The four SMR designs are indicated" to "information from the four SMR designs indicated"
77	8	Change "combined license construction permit" to "combined license or construction permit"
77	9	Change "EPS" to "ESP"
77	13	Change "excavation and safety" to "excavation of safety"
78	6	Change "cited" to "sited"
78	8	Change "following" to "falling"
78	8	Change "site." to "site,"
78	9	Change "following" to "falling"
78	10	Change "site. And" to "site, and"
78	14	Change "planning, the plume exposure path rate, EPZ size and" to "planning the plume exposure pathway EPZ sizing"
78	15	Change "associate" to "associated"
78	21	Change "planning. In" to "planning in"
78	22	Change "explosion path for" to "exposure pathway"
78	24	Change "TVA is" to "TVA's"
79	5	Change "were used in" to "will use the"
79	6	Change "explosion" to "exposure"
79	10	Change "explosion" to "exposure"
80	9	Delete "and"
80	10	Change "plans. Both of which consists of limit aspects" to "plans, both of which consist of limited aspects"
80	19	Change "or ETE." to "or ETE,"
80	20	Change "Which" to "which"
80	24	Change "plans. The" to "plans, the"
81	1	Change "applicants" to "applicant's"
81	7	Change "features and emergency" to "features emergency"
81	16	Change "EPA" to "EP"
81	18	Change "major feature" to "major features"
81	21	Change "EPA" to "EP"
83	13	Change "methodologies" to "methodology's"
84	3	Change "SECY 110152" to "SECY-11-0152"
84	4-5	Change "SECY 150077" to "SECY-15-0077"
84	8	Change "to the adapt of an approach" to "to adapt an approach"
84	12	Change "use" to "used"
84	16	Change "pathway, EPZ," to "pathway EPZ"
84	18	Change "environment" to "environmental"
84	24	Change "pathway, EPZ," to "pathway EPZ"
85	3	Change "pathway, EPZ," to "pathway EPZ"
85	5	Change "and early" to "in early"
86	1	Change "exclusionary" to "exclusion area"
86	8	Change "intake" to "intact"
86	25	Change "into" to "and to"
87	14	Change "verified" to "verify"
87	24	Change "NUREG-0396. Which" to "NUREG-0396, which"
88	13	Change "pathway, EPZ," to "pathway EPZ"
88	15	Change "site. In" to "site, in"

Page	Line	Correction
88	16-17	Change “public. That” to “public, that”
89	4	Change “permit, applicants” to “permit applicant’s”
89	5	Change “planning and exemptions” to “planning exemptions”
89	24	Change “ESP. Unless” to “ESP, unless”
90	15	Change “the request exemptions” to “the requested exemptions”
90	22	Change “protection that” to “protection, that”
91	18	Change “protection that is dose savings” to “protection, that is dose savings,”
91	25	Change “present in all” to “present and all”
92	13	Change “Staffs” to “Staff’s”
92	16	Change “52.18. And” to “52.18, and”
93	2	Change “major features of emergency” to “major features emergency”
93	7	Change “approached” to “approach”
93	14	Change “plan” to “plans”
93	20	Change “plans. Including” to “plans, including”
94	13	Change “28th” to “2018”
98	7	Change “EPS” to “ESP”
98	13	Change “encourage” to “encouraged”
98	15	Change “a conference” to “the conference”
98	25	Change “EPS” to “ESP”
99	2	Change “pathway for EPZ” to “pathway EPZ”
99	3	Change “request” to “requested”
99	6	Change “license of” to “license or”
99	8	Change “the implementation of TVA’s plume exposure pathway for” to “that implementation of TVA’s plume exposure pathway”
99	10	Change “technology supports” to “technology, supports”
99	11	Change “EPZ. And” to “EPZ and”
99	15	Change “combined license of” to “combined license or”
99	19	Change “combined license of” to “combined license or”
99	24	Change “path for” to “pathway”
100	2	Change “pathway for” to “pathway”
100	10	Change “request” to “requests”
102	7	Change “even” to “event”
102	8	Change “terrorists” to “terrorist attacks”
102	18	Change “a COL” to “the COL”
102	25	Insert “one in” before “a million”
103	2	Insert a comma after “So”
103	4	Move quotation mark from before “of” to before “a highly”
103	4	Change “of” to “if”
103	5	Change “occurs, an” to “occurs and”
103	7	Change “all hazards” to “all-hazards”
103	17-18	Change “comprehensive preparedness guide” to “Comprehensive Preparedness Guide 101”
103	18	Delete quotation mark before “developing”
103	18-19	Change “developing and maintaining emergency operations plans” to “Developing and Maintaining Emergency Operations Plans,”
103	20	Insert a quotation mark before “planning”

Page	Line	Correction
103	20	Change “planning considers all hazards and threats while” to “Planning considers all hazards and threats. While”
103	24	Change “hazards” to “hazard’s”
103	25	Change “task” to “tasks”
104	3	Change “all hazards” to “all-hazards”
104	6	Insert “by” after “protected”
104-05	25, 1	Capitalize “conference of radiation control program directors”
105	4	Capitalize “protection action guides”
105	4	Insert “(PAGS)” after “Guides”
105	10	Delete “method” after “PAG”
105	11	Change “NRC EPA taskforce” to “NRC/EPA Task Force”
105	11	Change “NRCs” to “NRC’s”
105	12	Change “520. As” to “EPA-520, as”
105	13-14	Change these lines to read as follows: “EPA-400-R-92-001, “Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.””
105	18	Change “The manual” to “This PAG manual”
105	18	Capitalize “when”
105	24	Change “work” to “worked”
106	9	Change “separated” to “separate”
107	8	Change “I guess would” to “Would”
107	10	Delete “if”
108	13	Change “about 80 feet about” to “about 80 feet above”
108	21	Insert “proposed” after “EPZ”
109	4	Change “COMMISSIONER CAPUTO” to “CHAIRMAN SVINICKI”
109	14	Change “permanent” to “permit”
109	20	Change “SEC” to “SE”
109	23	Change “permanent” to “permit”
110	22	Change “management and management” to “management—and management—”
110	23	Change “conditions and permit conditions” to “conditions—permit conditions—”
110	24	Change “Some of the management” to “Some of them, management”
111	13	Change “de novo” to “the novel”
111	22	Change “meet their” to “meet the”
113	2	Replace “whose” with “who is”
114	9	Change “past precedence” to “past precedents”
114	15	Change “and modeling in” to “in modeling and”
114	16	Change “this” to “is”
114	18	Change “a10ot” to “a lot”
114	24	Change “citing” to “siting”
115	1	Change “witnessed” to “witness”
115	17	Change “There is” to “There’s”
115	23	Change “in-site” to “site”
116	14	Change “are” to “is”
116	19	Change “And I think, so, I guess for” to “For”
116	21	Change “where” to “were”
116	22	Change “have” to “had”



Page	Line	Correction
117	3	Change “ask you a” to “answer your”
117	16	Delete “cite,”
118	22	Change “protection” to “protective”
118	23	Change “a” to “an”
119	3	Change “module” to “modular”
119	25	Change “EPS” to “ESP”
120	1	Change “Not two-miles from outside boundary, nothing” to “Not two-miles or site boundary, nothing”
120	8	Change “the small type” to “this multi-”
120	10	Change “which is the reactors” to “such as the reactor’s”
120	13	Insert “an” before “EPZ”
120	15-16	Change “dose distance” to “dose at distance”
120	21	Change “or” to “and”
122	12	Change “approach” to “approached”
122	18	Change “a” to “the”
122	20	Change “on” to “upon”
122	21	Change “accidents, but on the public perception” to “accidents . . . but on the public perceptions”
122	22	Change “problem, what” to “problem and what”
122	24	Capitalize “safety goal policy statement”
122	25	Insert a quotation mark before “emergency”
123	3	Insert a quotation mark after “populations.”
123	6	Insert a quotation mark before “views”
123	7-8	Change “advance reactor licensees as an essential element. The NRC’s defense-in-depth philosophy” to “advanced reactor licensees as an essential element in the NRC’s ‘defense-in-depth’ philosophy”
123	8	Insert a quotation mark after “philosophy.”
123	25	Change “then” to “than”
124	2	Change “the” to “a”
124	15	Insert “a” before “nuclear”
124	17	Delete “the” before “NRC”
124	24	Insert a quotation mark before “in any NRC”
124	25	Insert a comma after “proceeding”
125	2	Insert a quotation mark after “capability.”
125	5	Capitalize “federal emergency management agency”
125	8	Insert a quotation mark after “feasibility”
125	8	Delete quotation mark after “River.”
125	24	Change “onsite” to “on site”
125	25	Change “EPZ only” to “EPZ, only”
126	12	Change “27” to “2017”
126	14	Change “their” to “the”
126	19	Change “two” to “2”
127	5	Change “staff” to “staff’s”
127	12	Change “concerns, based” to “concerns. Based”
127	15	Change “in” to “at”
127	19	Change “The Staff’s” to “But the Staff’s”
128	11	Change “their” to “there”
128	21	Change “EPA” to “EP”

Page	Line	Correction
128	22	Change "Staff sees a little difference" to "Staff sees little difference"
129	16	Change "required, emergency" to "required. Emergency"
129	17	Change "planned" to "planning"
129	18	Change "FEMA's concern" to "FEMA is concerned"
129	21	Capitalize "radiological"
129	22	Change "all hazards framework." to "All Hazards framework—"
129	23	Change "Radiological" to "radiological"
130	4	Insert a quotation mark before "advance"
130	4	Change "advance planning," to "advanced planning—"
130	5	Change "EPZ" to "EPZ—"
130	6	Insert a quotation mark after "incident."
130	6	Insert a quotation mark before "we"
130	6	Change "which" to "wish"
130	9	Change "response, organization," to "response organization"
130	10	Change "it" to "is"
130	10	Insert a quotation mark after "EPZ."
131	4-5	Change "this, is" to "this? Is"
131	10	Change "context" to "contexts"
131	16	Change "fleet, there" to "fleet. There"
131	22	Delete "planning"
132	21	Change "MR. SCOTT" to "COMMISSIONER BARAN"
133	17-18	Change "here. They" to "here, they"
133	18	Change "uniqueness" to "uniqueness in"
133	23	Change "to NUREG-0396" to "in NUREG-0396"
134	25	Insert a quotation mark before "maintains"
135	1	Insert a quotation mark after "protection"
135	2	Change "MS. HART" to "MS. MILLIGAN"
135	24	Insert a quotation mark before "maintains"
135	25	Insert a quotation mark after "protection"
136	6	Insert a comma after "issue"
137	19	Insert "it" before "were"
138	2	Change "we" to "we'd"
138	13	Change "EPA" to "EPZ"
138	17	Insert a quotation mark before "because"
138	18	Change "SMR" to "SMRs"
138	20	Insert a quotation mark after "safety."
139	1	Change "an RAI" to "in an RAI"
139	8	Delete "the"
139	10	Change "the" to "these"
139	23	Change "circumstance is fine and its" to "circumstances finding is"
139	24	Change "here, it's" to "here. It's"
140	1	Change "module" to "modular"
140	5	Change "SMR construction" with "an SMR constructed"
140	7	Change "Staff" to "Staff's"
140	21	Insert "modular" before "reactors"
141	20	Change "use" to "used"
141	21	Change "a parameters" to "parameters"
142	3	Insert a quotation mark before "depending"

Page	Line	Correction
142	4	Change “for multiple” to “for multi-”
142	7	Insert a quotation mark after “determination.”
142	9	Change “Is” to “Isn’t”
142	24-25	Change “with the EPZ exemptions, and” to “without the EPZ exemptions. And”
144	19	Change “that,” to “that.”
145	2	Change “aware” to “away”
145	5	Change “either” to “any”
146	23	Change “Tennessee River Water Shed” to “Tennessee River Watershed”
147	2	Change “SMR. And” to “SMR, and”
147	11	Capitalize “final environment impact statement”
147	15-16	Change “we have performed” to “we would perform”
152	5	Change “an environmental” to “and environmental”
152	16	Change “as” to “ask”
153	6	Change “Oh” to “Okay”
155	8	Change “staff and their” to “staff in their”
156	13	Change “acres. And” to “acres and”
156	20-21	Change “redressed. And” to “redressed and”
158	5	Change “analysis” to “analyses”
158	12	Change “sites. And” to “sites and”
161	4	Change “which as” to “such as”
161	13	Change “sites. And” to “sites and”
162	5	Change “SRP” to “E-SRP”
163	15	Change “postulated acts and impacts” to “postulated accident impacts”
164	7	Change “including” to “including:”
166	14	Change “wouldn’t be subject to” to “would be subject to”
168	7-8	Change “comparable. And” to “comparable and”
169	10	Change “areas. And” to “areas and”
171	11	Change “Does the” to “The”
171	20	Change “PD.” to “PPE.”
172	14	Change “Not, and” to “And”
172	15	Change “differing” to “deferring”
173	18	Delete “kind of”
176	8	Delete “just”
176	10	Change “Phillip” to “Philip”
176	24-25	Change “and g-water, and the excavation” to “and dewatering the excavation”
177	11	Change “they can do monitoring” to “they committed to do monitoring”
178	25	Change “addressed properly” to “addressed promptly”
185	7	Insert a comma after “So”
185	8-9	Delete “And I guess, sorry, a little too quick, I think, for me to our path.”
185	11	Delete “sort of”
185	13	Change “a setting in” to “setting”
186	15	Change “considering” to “consider”
187	13	Delete “sort of”
187	17	Change “risk informed” to “risk-informed”
188	2	Delete “same,”

Page	Line	Correction
188	5	Change “that I think I would just leave” to “I think I will just leave that”
188	10	Change “10 to the minus 6th, 10 to the minus 7th” to “ $10^{-6}$ or $10^{-7}$ ”
189	3	Insert a comma after “catastrophes”
189	6	Delete “we are literally”
189	8	Change “all hazards” to “all-hazards”
189	10	Change “level of protection for” to “level of risk for protection of”
189	11	Insert “the risk of” before “asteroid”
189	13	Delete “sort of”
189	14	Delete “to me I think”
189	16	Delete “I think”
189	25	Change “That” to “But it”
191	16	Change “Communication” to “Communications”
191	21	Delete “really” after “it’s”

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
TENNESSEE VALLEY AUTHORITY	)	
	)	Docket No. 52-047-ESP
(Early Site Permit Application	)	
for Clinch River Nuclear Site)	)	
	)	
(Mandatory Hearing)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **ORDER (Adopting Transcript Corrections and Closing the Record)** have been served upon the following persons by Electronic Information Exchange.

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Dated at Rockville, Maryland,  
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[Original signed by Clara Sola \_\_\_\_\_]  
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