

US EPA ARCHIVE DOCUMENT

Asheville Steam Electric Plant
Dam Safety Inspection Report Comments

(1) Throughout, any reference to “Progress Energy” should be “Progress Energy Carolinas”.

(2) Section 1.1.1—Conclusions Regarding the Structural Soundness of the Management Unit(s)

Based on the Work Assignment Number 0-381 provided by EPA, each management unit (dam) is to be classified by the inspector as to its structural soundness in this section. Progress Energy Carolinas recommends the classification of FAIR for the 1964 dam and SATISFACTORY for the 1982 dam based on evaluations of the site assessment conducted on May 29, 2009.

The Work Assignment Number 0-381 defines the classification of FAIR as “Acceptable performance is expected under all required loading conditions in accordance with the applicable safety regulatory criteria.” The 1964 dam structure no longer impounds water nor do we intend to use it for this purpose in the future. Since the 1964 dam structure has operated for over 40 years without a significant slope stability incident, Progress Energy Carolinas proposes that a slope stability study may be useful but not critical to identify potential dam safety deficiencies. Thus, as “minor deficiencies may exist that require remedial action and/or secondary studies or investigations”, Progress Energy suggests the classification of FAIR for the 1964 dam. By definition, a certification of POOR applies only if the inspectors have identified a dam safety deficiency or if critical studies are required to establish structural soundness. This does not appear to be the case for the 1964 dam.

The Work Assignment Number 0-381 defines the classification of SATISFACTORY as “No existing or potential management unit safety deficiencies are recognized.”

Progress Energy Carolinas recommends that the possible classifications and their definitions be included with this report to ensure understanding by readers.

(3) Section 1.1.8—Classification Regarding Suitability for Continued Safe and Reliable Operation

The ratings of POOR and SATISFACTORY are inappropriately applied under this heading. Based on the EPA Work Assignment Number 0-381, these ratings, with others, are intended to classify the structural soundness of each management unit (see Comment 2 above). Further, the heading “Suitability for Continued Safe and Reliable Operation” is not used in Work Assignment Number 0-381 and should not be used in this report since it is not defined and is likely misunderstood.

(4) Section 1.3—List of Participants

Mr. Steve Blevins, MACTEC, was also present during the inspection.