Memorandum from the Office of the Inspector General

November 10, 2026

Thomas W. Barnett

REQUEST FOR FINAL ACTION – EVALUATION 2026-17641 – EMERGENCY PREPAREDNESS – HYDRO FACILITIES

Attached is the subject final report for your review and final action. Your written comments, which addressed your management decision and actions planned or taken, have been included in the report. Please notify us when final action is complete. In accordance with the Inspector General Act of 1978, as amended, the Office of the Inspector General is required to report to Congress semiannually regarding evaluations that remain unresolved after 6 months from the date of report issuance.

If you have any questions or wish to discuss our findings, please contact Lindsay J. Denny, Director, Evaluations - Operations, at (865) 633-7349. We appreciate the courtesy and cooperation received from your staff during the evaluation.

Greg Stinson
Assistant Inspector General
(Audits and Evaluations)

SNM:FAJ
Attachment
cc (Attachment):
TVA Board of Directors
Allen A. Clare
Jessica E. Dufner
Jill M. Matthews
Edward C. Meade
Ronald R. Sanders II
Michael D. Skaggs
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Ben R. Wagner
OIG File No. 2026-17641

Office of the Inspector General

Evaluation Report

To the Vice President,
River Operations

EMERGENCY PREPAREDNESS – HYDRO FACILITIES

Evaluation Auditor
Samantha N. Moore

Evaluation 2026-17641
November 10, 2026

ABBREVIATIONS

AED	Automatic External Defibrillator
BU	Business Unit
CPG	Comprehensive Preparedness Guide
ERP	Emergency Response Plan
FEMA	Federal Emergency Management Agency
GENR	Generation
NIMS	National Incident Management System
SPP	Standard Programs and Processes
TVA	Tennessee Valley Authority

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MEMORANDUM DATED OCTOBER 28, 2026, FROM TOM BARNETT
TO GREG STINSON

Evaluation 2026-17641
Emergency Preparedness – Hydro Facilities

EXECUTIVE SUMMARY

Why the OIG Did This Evaluation

The Tennessee Valley Authority (TVA) has 29 hydropower dams and 1 pumped-storage plant capable of providing over 5,000 megawatts of power. TVA's generating sites can encounter a wide range of emergency incidents including meteorological, technological/industrial, or human events.

The Federal Emergency Management Agency (FEMA), a part of the U.S. Department of Homeland Security, developed the National Incident Management System in 2004, as a shared approach to coordinate and manage incidents and communicate information. It provides guidance for responding to all types of incidents, in all levels of government and nongovernmental organizations, as well as in the private sector.

Using FEMA's guidance, Generation's Emergency Preparedness Program personnel created site-specific Emergency Response Plans (ERP) to protect plant personnel, the public, and the plant during emergency events. Additionally, Generation, Standard Programs and Processes, 35.002, *Generation Emergency Preparedness Program,* requires ERPs to be reviewed annually.

Due to the importance of an effective response in the event of an emergency, we conducted an evaluation of emergency preparedness at TVA hydro facilities. Our objectives were to determine if (1) emergency plans at TVA hydro facilities were up to date and included required elements and (2) required systems were available and functional.

What the OIG Found

We determined ERPs at TVA hydro facilities included all required elements, and all required systems were available and functional at the 8 sites we visited. However, emergency plans tested were not up to date. Specifically, we identified (1) incorrect contact information in all 7[i] of the emergency notification phone lists that we tested, and (2) the ERP list of required systems was inaccurate for 2 of 8 sites we tested.

[i] We only reviewed 7 ERPs because two sites share the same ERP.

Evaluation 2026-17641
Emergency Preparedness – Hydro Facilities

EXECUTIVE SUMMARY

What the OIG Recommends

We recommend the Vice President, River Operations, review the (1) emergency notification phone lists in each ERP and update inaccurate contact information and (2) required systems lists in each ERP and update any identified inaccuracies.

TVA Management's Comments

In response to our draft report, TVA management agreed with the recommendations. See the Appendix for TVA management's complete response.

BACKGROUND

The Tennessee Valley Authority (TVA) has 29 hydropower dams and 1 pumped-storage plant capable of providing over 5,000 megawatts of power. TVA's generating sites can encounter a wide range of emergency incidents including meteorological, technological/industrial, or human events. Since 2023, TVA hydro facilities have recorded over 30 incidents of varying degrees.

The Federal Emergency Management Agency (FEMA), a part of the U.S. Department of Homeland Security, developed the National Incident Management System (NIMS) in 2004, as a shared approach to coordinate and manage incidents and communicate information. It provides guidance for responding to all types of incidents, in all levels of government and nongovernmental organizations, as well as in the private sector.

TVA Standard Programs and Processes (SPP), 35.200, *Comprehensive Emergency Management Program,* requires that each Business Unit (BU) establish an emergency document that is specific to the BU's operating environment and aligns with NIMS principles. Additionally, TVA established Generation (GENR)-SPP-35.001, *Generation Emergency Plan,* to be the framework to respond to emergencies and GENR-SPP-35.002, *Generation Emergency Preparedness Program*, to document Generation's plan to mitigate, prepare, respond, and recover from emergency incidents effectively. Using FEMA's guidance, Generation's Emergency Preparedness Program personnel created site-specific Emergency Response Plans (ERP) to protect plant personnel, the public, and the plant during emergency events.

Site-specific hydro ERPs:

- Outline emergency roles and responsibilities, such as the Incident Commander, who assumes overall responsibility for the entire incident.
- Provide the assembly locations where nonresponse personnel gather during an incident.
- Identify emergency response systems that are kept on site, which include fire extinguishers, incipient firefighting[1] hoses/nozzles/appliances, automatic external defibrillators (AED), and spill/leak containment equipment.
- Provide an Emergency Notification Phone List that is the primary source of contact information during emergencies. The list contains contact information for a variety of parties including specific BUs and personnel within TVA, local emergency management agencies, fire departments, and hospitals.

[1] Occupational Safety and Health Administration defines an incipient stage fire as "a fire which is in the initial or beginning stage and which can be controlled or extinguished by portable fire extinguishers, Class II standpipe or small-hose systems without the need for protective clothing or breathing apparatus."

- Provide automatic plan activation triggers, such as fires/explosions resulting in visible smoke or flames, as well as specific actions and considerations to respond to the triggers.

FEMA also issued the Comprehensive Preparedness Guide (CPG) 101, which provides guidance for the development and maintenance of emergency plans. CPG 101 states that emergency plans should be reviewed and revised on a recurring schedule, such as monthly or annually. Accordingly, GENR-SPP-35.002, *Generation Emergency Preparedness Program,* requires ERPs to be reviewed annually.

Due to the importance of an effective response in the event of an emergency, we conducted an evaluation of emergency preparedness at TVA hydro facilities.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objectives were to determine if (1) emergency plans at TVA hydro facilities were up to date and included required elements and (2) required systems were available and functional. The scope of our evaluation included current ERPs for hydro facilities and required systems for selected sites. To achieve our objective, we:

- Reviewed the following TVA-SPPs, GENR-SPPs, and FEMA guidance to gain an understanding of emergency management:
  - TVA-SPP-35.000, *Emergency Management*
  - TVA-SPP-35.200, *Comprehensive Emergency Management Program*
  - GENR-SPP-35.001, *Generation Emergency Plan*
  - GENR-SPP-35.002, *Generation Emergency Preparedness Program*
  - FEMA guidance, including *NIMS and CPG 101*
- Interviewed Business Continuity personnel to gain an understanding of (1) ERPs for hydro facilities and (2) emergency management systems.
- Reviewed site-specific ERPs for all hydro plants[2] to (1) identify the most recent review dates and (2) determine if required emergency response elements[3] were included.
- Randomly selected 8[4] of 30 hydro sites and conducted site visits to test (1) the accuracy of the ERPs list of required systems; (2) the availability and functionality of required emergency systems; and (3) access to emergency management systems. Specifically, we:

[2] While there are 30 hydro facilities, there are only 28 hydro ERPs because Ocoee Hydro 1, 2, and 3 share 1 ERP.

[3] GENR-SPP-35.002 contains required elements for ERPs. The required elements we tested were administrative elements, emergency personnel identification and qualifications, incident management processes, and plan activation criteria.

[4] We randomly selected the following sites: Blue Ridge Hydro, Guntersville Hydro, Hiwassee Hydro, Melton Hill Hydro, Ocoee Hydro 1, Ocoee Hydro 3, Raccoon Mountain Pumped-Storage Plant, and Wilbur Hydro.

  - Interviewed Hydro Generation personnel.
  - Tested or observed testing of fire extinguishers and AEDs.
  - Observed spill/leak containment equipment.
- Tested the accuracy of emergency notification phone lists, for the 7 of 28[5] ERPs that relate to the site visits, to determine if contact information was up to date.
- Reviewed inspections of incipient firefighting hoses, nozzles, and appliances for the 8 randomly selected hydro sites that were visited to determine if inspections had been performed as required.

This evaluation was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

FINDINGS

We determined ERPs at TVA hydro facilities included all required elements, and all required systems were available and functional at the 8 sites we visited. However, emergency plans tested were not up to date. Specifically, we identified (1) incorrect contact information in all 7 of the emergency notification phone lists that we tested, and (2) the ERP list of required systems was inaccurate for 2 of 8 sites we tested.

EMERGENCY NOTIFICATION PHONE LISTS CONTAINED INCORRECT INFORMATION

According to GENR-SPP-35.002, *Generation Emergency Preparedness Program,* ERPs should be reviewed, and updated as needed, annually. While all 28 ERPs were reviewed on cadence, the emergency notification phone lists in the 7 ERPs we tested included inaccurate contact information, such as incorrect phone numbers, phone numbers that had been disconnected, phone numbers of emergency facilities that were permanently closed, or incorrect contact names. See Table 1 below for details.

[5] Our random selection of 8 sites only included 7 ERPs because Ocoee Hydro 1 and 3 were both selected.

Table 1: Emergency Notification Phone Lists Tested

Site	Total Emergency Contacts*	Contacts with Inaccurate Information	% of Contacts with Inaccurate Information
Melton Hill Hydro	31	4	12.90%
Raccoon Mountain Pumped Storage Facility	33	4	12.12%
Ocoee Hydro 1, 2, & 3	35	11	31.43%
Wilbur Hydro	31	3	9.68%
Guntersville Hydro	34	4	11.76%
Blue Ridge Hydro	30	3	10.00%
Hiwassee Hydro	30	2	6.67%

*Total emergency contacts do not include duplicate phone numbers.

Inaccurate emergency contact information could lead to delayed notification and slower response time in the event of an emergency.

ERP'S LIST OF REQUIRED SYSTEMS WERE INACCURATE FOR TWO SITES

Each ERP contains a list of required emergency systems maintained at the respective hydro facility. The required systems for the 8 selected sites that were visited included fire extinguishers, incipient firefighting hoses/nozzles/appliances, AEDs, and spill/leak containment equipment. All 8 sites had fire extinguishers, AEDs, and spill/leak containment equipment. However, 2 of 8 sites did not have incipient firefighting hoses/nozzles/appliances. The 2 sites without this system did not have hookups for this equipment and, therefore, should not have included them in the required emergency systems in their site-specific ERP.

RECOMMENDATIONS

We recommend the Vice President, River Operations, review the:

1. Emergency notification phone lists in each ERP and update inaccurate contact information.

   TVA Management's Comments – TVA management agreed with the recommendation. See the Appendix for TVA management's complete response.

2. Required systems list in each ERP and update any identified inaccuracies.

   TVA Management's Comments – TVA management agreed with the recommendation. See the Appendix for TVA management's complete response.

October 28, 2026

Greg Stinson, WT 2C-K

REQUEST FOR COMMENTS – DRAFT EVALUATION 2026-17641 – EMERGENCY PREPAREDNESS - HYDRO FACILITIES

This is in response to your memorandum dated September 29, 2026. After review of the draft evaluation, please see the following responses.

We would like to thank Samantha N. Moore and Lindsay J. Denny for their diligence and support to optimize TVA's Emergency Preparedness at our Hydro facilities.

Recommendations

We recommend the Vice President, River Operations, review the:

1. Emergency notification phone lists in each ERP and update inaccurate contact information.

   Response
   River Operations agrees with the recommendation

2. Required systems list in each ERP and update any identified inaccuracies.

   Response
   River Operations agrees with the recommendation.

Thank you for allowing us to provide these comments. Please contact us if you have any questions.

Tom Barnett
Vice President
River Operations

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OIG File No. 2026-17641