



Entergy Operations, Inc.
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Michael A. Krupa
Director
Nuclear Safety & Licensing

October 25, 2000

U.S. Nuclear Regulatory Commission
Washington, DC 20555
ATTN: Document Control Desk

Subject: Entergy Operations, Inc. Withdrawal of Consolidation of the Four Current Security Programs into one Integrated Nuclear Security Plan and an Integrated Security Training and Qualification Plan

Arkansas Nuclear One
Units 1 & 2
Docket Nos. 50-313 & 50-368
License Nos. DPR-51 & NPF-6

Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

River Bend Station
Docket No. 50-458
License No. NPF-47

Waterford 3 Steam Electric Station
Docket No. 50-382
License No. NPF-38

References: NRC letter dated June 15, 2000; Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station; River Bend Station; and Waterford Steam Electric Station, Unit 3; Review of Proposed Integrated Nuclear Security Plan and Integrated Security Training and Qualification Plan (TAC NOS. MA6571, MA6572, MA6764, MA6750, and MA6663)

Entergy Operations, Inc. letter dated September 7, 1999; (CNRO - 98/00023) Consolidation of the Four Current Security Programs into one Integrated Nuclear Security Plan and an Integrated Security Training and Qualification Plan

CNRO-2000-00035

Gentlemen:

On September 7, 1999 in accordance with 10 CFR 50.90, as required by 10 CFR 50.54 (p)(1) Entergy Operations, Inc. (EOI) requested NRC staff review and approval of the Integrated Nuclear Security Plan (INSP) and Integrated Security Training and Qualification Plan (IST&Q) for use by all EOI facilities. We thank you for your prompt review of our submittal and the detailed comments provided. Clearly, significant philosophical differences remain on how to implement current security requirements.

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Withdrawal of Consolidation of the Four Current Security Programs

October 25, 2000

CNR0-2000-00035

Page 2 of 2

Entergy's submittal represented a different approach to meeting the applicable requirements stated in 10 CFR 73, Section 73.55, Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage, 10 CFR 73, Appendix C: Licensee Safeguards Contingency Plans, and the applicable parts of 10 CFR 73 Appendix B: General Criteria for Security Personnel. In consolidation of our plans into a single plan, the proposed INSP utilized many existing plan features that had previously been deemed to satisfy the commission's security regulations.

The submittal was proposed to provide consistency in security program implementation within EOI and bring the EOI Security Programs in closer alignment with each other utilizing previously accepted NRC program elements from EOI plants. We believed this approach had desired resource and efficiency benefits for both EOI and the NRC in implementation and inspection to the security regulatory requirements. The need for a comprehensive review of existing security regulations to achieve better consistency has been recognized by the Commission, staff and industry, and this effort is currently underway with proposed rulemaking expected in early 2001.

Because we believe significant changes to all of our security plans will be necessitated by the new rule, when finalized in the next 2-3 years, expenditure of significant resources in the interim does not appear prudent. Entergy is withdrawing from further consideration the subject submittal. TAC NOS. MA6571, MA6572, MA6764, MA6750, and MA6663 should be closed.

Should you have any comments or questions regarding this matter please contact me or Mr. Les England at (601) 368-5766.

Sincerely,



MAK/LAE/baa

cc:

Mr. C. G. Anderson (N-GSB)
Mr. C. M. Dugger (W-GSB-300)
Mr. W. A. Eaton (G-ESC3-VPO)
Mr. R. K. Edington (R-GSB-40)
Mr. G. J. Taylor (M-ECH-65)

Mr. T. W. Alexion, NRR Project Manager (ANO-2)
Mr. J. F. Harold, NRR Project Manager (RBS)
Mr. N. Kalyanam, NRR Project Manager (W3)
Mr. E. W. Merschoff, RIV Administrator
Mr. W. D. Reckley, NRR Project Manager (ANO-1)
Mr. S. P. Sekerak, NRR Project Manager (GGNS)