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March 31, 2003

Director  
New Reactor Project Licensing Office  
Office of Nuclear Reactor Regulation  
Mailstop O-4D9A  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments on Draft ESP Review Standard (RS-002)

Reference: *Federal Register* Vol. 68, No. 1, Pages 132, dated January 2, 2003 (Notice of Availability of Draft Review Standard for Early Site Permit Applications)

CNRO-2003-00011

Dear Mr. Lyons:

Entergy Nuclear, Inc. (Entergy) is pleased to submit our comments in the above captioned matter.

Entergy endorses the comments submitted by Nuclear Energy Institute (NEI) on behalf of the nuclear energy industry on the NRC draft Early Site Permit Review Standard.

The draft Review Standard does not incorporate review guidance for review of the Plant Parameter Envelope approach to an Early Site Permit which is being used by the three pending applicants. We recommend that the staff incorporate this approach into the Review Standard. Additionally, we recommend that the NRC staff consider a pre-planned revision to RS-002 to incorporate lessons learned from the three pending applications.

We recommend that a standard approach be used in all sections for incorporating the 1996 10CFR100 regulation changes. As noted in specific NEI comments, some sections still quote 10CFR100.11, some sections reference 10CFR100 Subpart B, and some sections only reference 10CFR100.20 (failing to incorporate 10CFR100.21 siting criteria). We recommend that all appropriate sections clearly reference 10CFR100 Subpart B.

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Thank you for the opportunity to provide these comments. If you have any questions concerning this submittal, please contact George Zinke (601-368-5381) or me (601-368-5327).

Sincerely,



Kenneth Hughey  
Sr. Manager Business Development  
Entergy Nuclear, Inc.

WKH/GAZ/JFH/

cc: Mr. C. R. Hutchinson (ECH)  
Mr. D. R. Keuter (ECH)  
Mr. J. J. Kelly (WPO)  
Mr. M. A. Krupa (ECH)  
Mr. R. J. Bell (NEI)  
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