

January 8, 2004

Mr. George A. Williams  
Site Vice President  
Grand Gulf Nuclear Station  
Entergy Operations, Inc.  
P. O. Box 756  
Port Gibson, MS 39150

SUBJECT: GRAND GULF NUCLEAR STATION, UNIT 1 - ISSUANCE OF AMENDMENT  
RE: CHANGES TO PRIMARY CONTAINMENT AND DRYWELL ISOLATION  
INSTRUMENTATION REQUIREMENTS (TAC NO. MB8958)

Dear Mr. Williams:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 162 to Facility Operating License No. NPF-29 for the Grand Gulf Nuclear Station, Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated May 8, 2003, as supplemented by letter dated October 24, 2003.

The amendment changes TS 3.3.6.1, "Primary Containment and Drywell Isolation Instrumentation," to add a Note allowing intermittent opening of penetration flow paths, under administrative control, that are isolated to comply with TS ACTIONS and to revise the operability requirement for the Reactor Core Isolation Cooling (RCIC) steam supply line low pressure isolation instrumentation to be consistent with the RCIC system operability requirements.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

**/RA/**

Bhalchandra Vaidya, Project Manager, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-416

Enclosures: 1. Amendment No. 162 to NPF-29  
2. Safety Evaluation

cc w/encls: See next page

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Bhalchandra Vaidya, Project Manager, Section 1  
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Office of Nuclear Reactor Regulation

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Enclosures:

- 1. Amendment No. 162 to NPF-29
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cc w/encls: See next page

\*See previous concurrence

Accession No.:ML040090316

\*No significant change from SE Input

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SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION  
ENERGY MISSISSIPPI, INC.  
DOCKET NO. 50-416  
GRAND GULF NUCLEAR STATION, UNIT 1  
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 162  
License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Entergy Operations, Inc. (the licensee) dated May 8, 2003, as supplemented by letter dated October 24, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications, as indicated in the attachment to this license amendment; and paragraph 2.C.(2) of Facility Operating License No. NPF-29 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 162, are hereby incorporated into this license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Robert A. Gramm, Chief, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: January 8, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 162

FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3.3-48  
3.3-56  
3.3-58

Insert

3.3-48  
3.3-56  
3.3-58

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 162 TO

FACILITY OPERATING LICENSE NO. NPF-29

ENTERGY OPERATIONS, INC., ET AL.

GRAND GULF NUCLEAR STATION, UNIT 1

DOCKET NO. 50-416

1.0 INTRODUCTION

By application dated May 8, 2003, as supplemented by letter dated October 24, 2003, Entergy Operations, Inc., et al. (Entergy or the licensee), requested changes to the Technical Specifications (TSs) for Grand Gulf Nuclear Station, Unit 1 (GGNS). The supplemental letter dated October 24, 2003, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U. S. Nuclear Regulatory Commission (NRC) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on June 10, 2003 (68 FR 34664).

The proposed amendment would change TS 3.3.6.1, "Primary Containment and Drywell Isolation Instrumentation," to add a Note allowing intermittent opening of penetration flow paths, under administrative control, that are isolated to comply with TS ACTIONS and to revise the operability requirement for the Reactor Core Isolation Cooling (RCIC) steam supply line low pressure isolation instrumentation to be consistent with the RCIC system operability requirements during reactor startup.

Specifically, the proposed changes affect primary containment and drywell isolation instrumentation requirements established by TS 3.3.6.1. The first proposed change is to add an ACTION Note to Limiting Condition for Operation (LCO) 3.3.6.1 allowing intermittent opening, under administrative control, of penetration flow paths that are isolated to comply with TS ACTIONS. The proposed change is consistent with Technical Specifications Task Force (TSTF) Improved Standard Technical Specifications (STS) Change Traveler, TSTF-306, Revision 2 as applicable to boiling water reactor (BWR/6) plants.

The new Note states:

1. Penetration flow paths may be unisolated intermittently under administrative control.

In conjunction with this change, some administrative changes are also proposed to reflect the existence of multiple ACTION Notes. The existing Note will be labeled as Note 2 and the

"NOTE" heading will be changed to "NOTES." These changes are administrative only and do not change the intent of the current requirements or allowances.

The second change is to revise the applicability for Function 3.c of TS Table 3.3.6.1-1, "RCIC Steam Supply Line Pressure - Low." The isolation function is currently required to be operable in plant MODES 1 (Run), 2 (Startup), and 3 (Hot Shutdown). Entergy proposes to add a footnote to the applicable plant operating mode requirements to not require the isolation function to be OPERABLE in MODE 2 or 3 when the reactor pressure is less than 150 psig during reactor startup.

Additional administrative changes are proposed along with this change to revise the designation of existing footnotes (d), (e), and (f) to footnotes (e), (f), and (g), respectively, to account for the new footnote added for Function 3.c. These changes are administrative only and do not change the intent of the existing footnotes.

In summary, Entergy is proposing to adopt TSTF-306, Revision 2 and revise the operability requirements for the RCIC steam supply line low pressure isolation instrumentation to be consistent with the operability requirements for the RCIC system.

## 2.0 REGULATORY EVALUATION

The NRC staff finds that the licensee in Attachment 1, Section 5 of its May 8, 2003, submittal identified the applicable regulatory requirements. The regulatory requirements on which the staff based its acceptance are:

1. The regulations in Title 10 of *Code of Federal Regulations* (10 CFR), section 50.36, "Technical specifications," establish the requirements for TSs. In 10 CFR 50.36(c)(2)(ii), criteria for establishing TS LCOs of a nuclear reactor are stated. Applying 10 CFR 50.36(c)(2)(ii) to identify requirements to be retained in STS as LCOs resulted in the Improved STS (NUREGs 1430-1434).
2. NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6."
3. The regulations in 10 CFR 50.90, "Application for amendment of license or construction permit," 10 CFR 50.91, "Notice for public comment; State consultation," and 10 CFR 50.92, "Issuance of amendment," establish the requirements for amendments to the operating license and no significant hazards consideration determination.
4. 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 54, "Piping systems penetrating containment," requires that piping systems penetrating the primary reactor containment shall be provided with leak detection, isolation, and containment capabilities having redundancy, reliability, and performance capabilities which reflect the importance to safety of isolating these piping systems.
5. The staff also made use of applicable guidance in TSTF-306, Revision 2.

### 3.0 TECHNICAL EVALUATION

The NRC staff has reviewed the licensee's regulatory and technical analyses, in support of its proposed license amendment, which are described in Attachment 1, Sections 3 and 5 of the licensee's submittal, as supplemented. The detailed evaluation below will support the conclusion that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

#### 3.1 Addition of Actions Note 1 To LCO 3.3.6.1 and TSTF-306 Adoption

For this change, the NRC staff review considered the proposed relaxation of the TS requirements for primary containment isolation valves (PCIVs) isolated to comply with instrumentation TS Actions.

GGNS isolation instrumentation specified in LCO 3.3.6.1 automatically initiates closure of appropriate PCIVs and drywell isolation valves. The function of the PCIVs, in combination with other accident mitigation systems, is to limit fission product release during and following a postulated design basis accidents (DBA). The isolation of drywell isolation valves, in combination with other accident mitigation systems, functions to ensure that steam and water releases to the drywell are channeled to the suppression pool to maintain the pressure suppression function of the drywell. The design of the primary containment and drywell penetration isolation instrumentation supports primary containment integrity by automatically initiating closure of appropriate PCIVs and drywell isolation valves. In general, LCO 3.3.6.1 instrument functions are required to be operable in Modes 1, 2, and 3, consistent with the applicability requirements of LCO 3.6.1.1, "Primary Containment Isolation" and LCO 3.6.5.1, "Drywell," for establishing containment integrity.

In its application, as supplemented, Entergy is seeking relief from the current TS requirements, which prohibit opening valves isolated to comply with TS Actions for inoperable instrument channels or functions. Opening isolated penetrations would incur additional TS action requirements. The proposed change is consistent with the allowance for opening valves isolated to comply with TSs 3.6.1.3 and 3.6.5.3 when valve operability requirements are not met. Entergy has therefore proposed LCO 3.3.6.1, Note 1. This note would read, "Penetration flow paths may be unisolated intermittently under administrative control." Note 1 applies to the Table 3.3.6.1-1 functions for Main Steam Line Isolation (Function 1), Primary Containment and Drywell Isolation (Function 2), Reactor Core Isolation Cooling System Isolation (Function 3), Reactor Water Cleanup System Isolation (Function 4), and RHR [Residual Heat Removal] System Isolation (Function 5). For these system isolation functions, flow paths are required to be isolated if inoperable channels are not tripped as specified in Required Action A.1, or if inoperable channels result in loss of isolation capability and this capability is not restored as specified in Required Action B.1. The administrative controls requirement of Note 1 consists of stationing a dedicated operator at the controls of the valve(s). The operator would be in



continuous communication with the control room. If a need for primary containment or drywell isolation is indicated, the operator could rapidly isolate the penetration.

The NRC staff accepts the addition of an Actions Note to isolation actuation instrumentation. The Note is consistent with the precedent for penetrations isolated when valve operability requirements are not met. LCOs are the lowest functional capability or performance level of equipment required for safe operation of the facility. When an LCO is not met, TSs specify Actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. By proposing to revise required Actions, options are added so that resulting TS Actions allow more effective use of operator resources for maintaining the reactor in a safe state for continued operation of the plant when the LCO is not met. These changes are consistent with STS. This less restrictive requirement is acceptable because it will not adversely affect the safe operation of the plant. The administrative measures for opening isolated valves, together with TS requirements that remain for meeting containment integrity by automatically initiating containment isolation on the Table 3.3.6.1-1 functions, provide reasonable assurance that public health and safety will be protected.

### 3.2 Revise RCIC Instrumentation TS

For this change, the NRC staff review considered the proposed relaxation of the TS operability requirements for the RCIC steam supply line low pressure isolation instrumentation.

The licensing basis accident mitigation discussion in Section 3.1, above, for isolation instrumentation also applies to the RCIC system. The RCIC Isolation Instrumentation functions are provided in Table 3.3.6.1-1, as Function 3. The proposed TS changes apply to Function 3.c, RCIC Steam Supply Line Pressure - Low. Low RCIC steam supply line pressure indicates that the pressure of the steam may be too low to continue operation of the RCIC turbine. The Bases for the current TS state that this isolation is for equipment protection and is not assumed in any transient or accident analysis in the Updated Final Safety Analysis Report (UFSAR). However, this isolation function also provides a diverse signal to indicate a possible system break. These instruments are included in the TS because of the potential for risk due to possible failure of the instruments preventing RCIC initiations. In general, the PCIV instrument functions are required to be operable in Modes 1, 2, and 3, consistent with the applicability for LCO 3.6.1.1 and LCO 3.6.5.1. Thus, since the RCIC steam supply low pressure isolation instrumentation serves to support primary containment integrity during adverse conditions, it is therefore required to be operable in Modes 1, 2, and 3. This is consistent with NUREG-1434.

The RCIC provides core cooling when the reactor pressure vessel (RPV) level is low and when the RPV is isolated from the main condenser. The RCIC system is designed to provide rated flow over a range of reactor pressures from 150 psig to the maximum pressure corresponding to the lowest opening set point for the Safety Relief Valves (SRVs). In particular, the loss-of-feedwater-flow transient assumes that the RCIC will maintain sufficient water level inside the core shroud to ensure that the top of the active fuel will be covered throughout the event. The transient analysis also assumes that the low-set point SRVs would remove the stored and

decay heat since Main Steam Isolation Valve closure on low water level isolates the reactor from the main condenser.

The RCIC system uses a steam-driven turbine pump and the steam supply line is monitored by pressure instrumentation. The primary functions of the pressure instrumentation are to isolate the steam supply line when pressure is too low for effective turbine operation and to isolate the supply line during a pipe break. During a DBA loss-of-coolant accident (LOCA), this trip function is the only means for automatically initiating an RCIC system isolation. Since the accident dose analysis assumes no post-accident leakage from the RCIC steam supply system, the RCIC steam supply line pressure-low isolation function is implicitly credited in the UFSAR accident analysis. The control rod drop accident analysis credits RCIC in conjunction with High Pressure Core Spray system to provide long term core cooling.

In its application, as supplemented, Entergy is seeking relief from the current TS requirements for the Mode 2 and Mode 3 RCIC low steam supply pressure isolation requirements by eliminating these requirements during reactor startup when reactor pressure is less than 150 psig. Entergy provided a revised accident analysis basis and applicability discussion for the RCIC low steam pressure isolation function. The Bases will state that the instruments are included in the TS because the accident analysis implicitly assumes that the penetration is closed during a DBA LOCA, and because of the potential risk due to possible failure of the instruments preventing RCIC initiations. Entergy proposes to add Footnote (d) to Table 3.3.6.1-1. Footnote (d) would apply to Mode 2 and Mode 3 and read, "Not required to be OPERABLE in MODE 2 or 3 with reactor steam dome pressure less than 150 psig during reactor startup." Additional administrative changes are proposed to revise the designation of existing footnotes (d), (e), and (f) to (e), (f), and (g), respectfully, to account for the new footnote added to Function 3.c. Entergy's license amendment safety analysis concludes that in order to prepare the RCIC turbine for standby service during a reactor startup when reactor pressure is less than 150 psig, it is acceptable to not require the system to be isolated because the likelihood of a steam line break or DBA is low during the short period when reactor power and reactor pressure are low.

Low steam supply line pressure is a normal condition during the reactor heatup period. Thus, the steam supply valves (inboard, outboard, and inboard bypass isolation valves) are isolated until the steam pressure exceeds the low-pressure set point (less than 60 psig). The low-pressure isolation function causes delays in plant startup and in restoring RCIC to standby operation following restart.

The steam supply line low pressure is one of the leak detection signals associated with the isolation of RCIC valves. The other leak detection signals required by the TSs are the following:

- RCIC Steam Flow-High
- RCIC Equipment Room Temperature-High
- Main Steam Line Tunnel Ambient Temperature-High
- RHR Equipment Ambient Room Temperature-High

## RCIC/RHR Steam Line Flow-High

The following RCIC isolation valves are isolated by the leak detection logic:

- Steam supply valves
- Pump suction valve
- Turbine exhaust valves
- Turbine exhaust vacuum breaker valves

During the brief period when the low-pressure isolation function is disabled, the high temperature and high flow system isolation signals listed above are still operable.

The RCIC system function during Mode 1 is not affected since the proposed change applies only during reactor startup and the initial system startup. RCIC system initiation when the reactor is in operation are not affected by the proposed change.

The NRC staff accepts revising applicability requirements to not require the RCIC low steam supply pressure isolation instrumentation (Table 3.3.6.1-1, Function 3.c) to be operable in Modes 2 and 3 when the reactor steam dome pressure is less than 150 psig during a startup. LCOs are the lowest functional capability or performance level of equipment required for safe operation of the facility. By proposing changes to applicability requirements, operational flexibility is gained while some containment integrity requirements currently in TS are replaced. This change in requirements does not affect all TS functions for monitoring RCIC system steam flow parameters related to detecting RCIC steam line breaks. The operability requirements of the following monitoring parameters are not changed: manual, high steam flow, high turbine exhaust diaphragm pressure, high steam tunnel ambient temperature, and high equipment room temperatures, are still required to be operable. These monitored parameters should be sufficient to provide the operators adequate controls, both automatic and manual, to establish containment integrity in the event of a line break with the reactor at low pressure and low power.

The NRC staff concludes that the proposed TS changes are acceptable and will not affect the safe operation of the plant because the TS manual and automatic functions that remain for monitoring RCIC system steam flow parameters related to RCIC steam line breaks provide reasonable assurance that public health and safety will be protected. Entergy also proposed a number of administrative changes to Table 3.3.6.1-1. The NRC staff review finds those acceptable because they do not result in any substantive change in operating requirements and are consistent with the Commission's regulations.

## 4.0 LIST OF REGULATORY COMMITMENTS

The licensee, in its application included regulatory commitments. The commitments are listed in the following table.

List of Regulatory Commitments

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Operating procedures will require the TTV [Turbine Trip/Throttle Valve] to be maintained closed during plant startup whenever the RCIC steam supply line penetration is not isolated and the low pressure automatic isolation function is not available. This will preclude any inadvertent turbine operation while warming the steam lines at low pressure.		X	Within 60 days of amendment issuance
Because the RCIC turbine exhaust line vacuum breaker isolation valves will not have automatic isolation capability while the steam supply low pressure permissive signal is unavailable, operating procedures will require the valves to remain closed until the RCIC steam supply low pressure instrumentation is restored.		X	Within 60 days of amendment issuance

The NRC staff finds that reasonable controls for the implementation and for subsequent evaluation of proposed changes pertaining to the above regulatory commitments are best provided by the licensee's administrative processes, including its commitment management program. The above regulatory commitments do not warrant the creation of regulatory requirements (items requiring prior NRC approval of subsequent changes).

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Mississippi State official was notified of the proposed issuance of the amendment. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (68 FR 34665). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: C. Schulten  
G. Thomas

Date: January 8, 2004

Grand Gulf Nuclear Station

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November 2003

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