

APPENDIX B
TO FACILITY OPERATING LICENSE NO. NPF-38
WATERFORD STEAM ELECTRIC STATION – UNIT NO. 3

ENTERGY LOUISIANA, INC.
DOCKET NO. 50-382

ENVIRONMENTAL PROTECTION PLAN
(NONRADIOLOGICAL)

WATERFORD STEAM ELECTRIC STATION - UNIT NO. 3
ENVIRONMENTAL PROTECTION PLAN
(NON-RADIOLOGICAL)

TABLE OF CONTENTS

Section	Page
1.0 Objectives of the Environmental Protection Plan	1-1
2.0 Environmental Protection Issues	2-1
2.1 Aquatic Issues.....	2-1
2.2 Terrestrial Issues.....	2-1
2.3 Cultural Resource Issues.....	2-1
3.0 Consistency Requirements.....	3-1
3.1 Plant Design and Operation.....	3-1
3.2 Reporting Related to the NPDES or LPDES Permit and State Certification	3-2
3.3 Changes Required for Compliance with Other Environmental Regulations.....	3-2
4.0 Environmental Conditions.....	4-1
4.1 Unusual or Important Environmental Events.....	4-1
4.2 Environmental Monitoring	4-1
5.0 Administrative Procedures.....	5-1
5.1 Review and Audit.....	5-1
5.2 Records Retention.....	5-1
5.3 Changes in Environmental Protection Plan.....	5-1
5.4 Plant Reporting Requirements.....	5-2

1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during operation of the nuclear facility. The principal objectives of the EPP are as follows:

- (1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES-OL and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State, and local requirements for environmental protection.
- (3) Keep NRC informed of the environmental effects of facility and of actions taken to control those effects.

Environmental concerns identified in the FES-OL which relate to water quality matters and regulated by way of the licensee's NPDES or LPDES permit.

2.0 Environmental Protection Issues

In the FES-OL dated September 1981, the staff considered the environmental impacts associated with the operation of Waterford Steam Electric Station Unit No. 3. The environmental resources which were evaluated, and the corresponding NRC staff decisions regarding the protection of each resource are as follows:

2.1 Aquatic Resources Issues

Effluent limitations and monitoring requirements are contained in the NPDES or LPDES Permit issued by the Federal or State permitting authority. The NRC will rely on these agencies for regulation of matters involving the protection of water quality and aquatic biota.

2.2 Terrestrial Resources Issues

No terrestrial resources issues were raised by the staff in the FES-OL.

2.3 Cultural Resources Issues

There are two archaeological sites on the licensee's property which have been determined to be eligible for the National Register of Historic Places. Protection for these two sites will be provided through a Cultural Resources Protection Plan. NRC requirements with regard to the cultural resources issue are specified in Subsection 4.2.1 of this EPP.

3.0 Consistency Requirements

3.1 Plant Design and Operation

The licensee may make changes in station design or operation or perform tests or experiments affecting the environment, provided such activities do not involve an unreviewed environmental question and do not involve a change in the EPP. Changes in plant design or operation or performance of tests or experiments which do not affect the environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this Section.

Before engaging in construction or operation activities which may significantly affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. Activities are excluded from this requirement if all measurable nonradiological effects are confined to the on-site areas previously disturbed during site preparation and plant construction. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activity and obtain prior NRC approval. When such activity involves a change in the EPP, such activity and change to the EPP may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3 of this EPP.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns: (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the FES-OL, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board; or (2) a significant change in effluents or power level [in accordance with 10 CFR Part 51.5(b)(2)] or (3) a matter, not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subection. These records shall include written evaluations which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question or constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0.

3.2 Reporting Related to the NPDES or LPDES Permit and State Certification

The NRC shall be provided with a copy of the current NPDES or LPDES permit or State Clean Water Act, Section 401 certification within 30 days of approval. Changes to the NPDES or LPDES permit or state certification shall be reported to the NRC within 30 days of the date the change is approved.

3.3 Changes Required for Compliance with Other Environmental Regulations

Changes in plant design or operation and performance of tests or experiments that are either regulated or mandated by other federal, state, and local environmental regulations are not subject to the requirements of Section 3.1. However, if any environmental impacts of a change are not evaluated under other federal, state, or local environmental regulations, then those impacts are subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC Operations Center within 24 hours, followed by a written report per Subsection 5.4.2. If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this Subsection is not required. However, the follow-up written report per Subsection 5.4.2 is still required. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions, and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Cultural Resources Protection Plan

The licensee, the NRC and the State Historic Preservation Officer (SHPO) concur that the appropriate action to be taken to negate any possible adverse effects to the Waterford 3 cultural resources by the operation and maintenance activities of the licensee will be through a Cultural Resources Protection Plan that provides documentation of a "no adverse effect" determination. This Cultural Resources Protection Plan was transmitted to the NRC and the SHPO by a letter from L. V. Maurin to G. W. Knighton, dated April 15, 1983 for final review and concurrence, after which the NRC submitted the plan to the Advisory Council on Historic Preservation (ACHP) for comment on September 28, 1983. ACHP concurrence was received by the NRC, on October 18, 1983 without change.

The Cultural Resources Protection Plan, as referenced above, is the binding document to which the licensee will adhere and this Section of the EPP is considered fully satisfied with no further action required.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organizational structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records associated with this EPP shall be made and retained in a manner convenient for review and inspection. These records shall be made available to the NRC on request.

Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained until the date of the termination of the license. All other records relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

5.3 Changes in Environmental Protection Plan

Request for a change in the Environmental Protection plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

5.4 Plant Reporting Requirements

5.4.1 Deleted

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of any event described in Section 4.1 of this Plan. The reports shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the same time it is submitted to the other agency.