



SAFEGUARDS INFORMATION

Entergy
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George A. Williams
Vice President-Operations
Grand Gulf Nuclear Station

GNRO-2004/00032

April 29, 2004

Via Overnight Delivery

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: Supplemental Response to the April 29, 2003 Orders to Entergy

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

REFERENCES: See Below

Dear Sir or Madam:

The NRC issued an Order dated April 29, 2003, Requiring Compliance with Revised Design Basis Threat ("Order EA-03-086" or "Order") and other security related Orders (collectively "Orders") for Grand Gulf Nuclear Station (GGNS). This Supplemental Response of Entergy to Order EA-03-086 supplements the previous response dated June 3, 2003 that Entergy filed pursuant to 10 CFR § 50.4 and Section III, Conditions A.1, B.1 and B.2.

Order EA-03-086 imposes license conditions on nuclear power plants licensed pursuant to the Atomic Energy Act of 1954 and Title 10 of the Code of Federal Regulations. Section III.A of the Order requires licensees to revise their physical security plans and safeguards contingency plans to provide protection against the revised design basis threat (DBT) set forth in Attachment 2 to the Order. Section III.A also requires licensees to revise the security force training and qualification plan to implement the revised DBT. These revised plans, along with an implementation schedule, were required to be submitted to the Commission for review and approval no later than April 29, 2004.

In accordance with the Order and 10 CFR § 50.4, Entergy is submitting this Supplemental Response for the above-mentioned licensed facility. This submittal includes, as Attachment A, revisions to the GGNS Physical Security Plan, Contingency Plan and Training and Qualification Plan, as required by Order EA-03-086. These plans contain the integrated commitments to comply with Order EA-03-086 and the other security related Orders issued on February 25, 2002, January 7, 2003, and April 29, 2003. As a result, these plans supersede previous submittals of Entergy in these areas, including those related to the February 25, 2002, January 7, 2003, and April 29, 2003, Orders. GGNS will continue to implement the provisions of those previous submittals except to the extent that they are

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superseded by these plans. All changes that have been or will be made have been evaluated to ensure that they do not compromise plant safety.

Entergy has developed these plans to be consistent with NEI-03-01 (Revision 1), *Nuclear Power Plant Access Authorization Program* (April 2004); NEI-03-09 (Revision 2), *Security Officer Training Program* (April 2004); and NEI-03-12 (Revision 2 (draft)), *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan*, (April 2004). The schedule for completing those actions, which includes the identification of major transitional activities, is provided in Attachment B to this submittal. To facilitate the NRC's review, any provisions that are different from NEI-03-01, NEI-03-09 or NEI-03-12 are identified and the justification provided in Attachment C, *Deviations from NEI-03-12*, to this submittal. Attachment D, *Previous Exemptions to 10 CFR Part 73*, is a listing of any exemptions to 10 CFR Part 73 previously granted to GGNS and an explanation of their status under the plans hereby submitted. Attachment E, *Justifications for Three Alternatives*, includes the justification for any of the alternatives provided in NEI-03-12 or in "NRC Guidance on Implementation of the April 2003 Revised Design Basis Threat" that GGNS has adopted.

When the final revision of NEI-03-12 is approved by the NRC, GGNS will supplement this response, if necessary, upon final resolution of those issues to conform with NEI-03-12 as finally approved. However, with the filing of these plans, Entergy will be implementing its revised protection strategy and completing plant modifications and security personnel training pursuant to these plans to ensure that implementation will be completed by October 29, 2004, as required by the Orders. Upon completion of the implementation of these plans, GGNS will be in compliance with all applicable security requirements. For the purpose of complying with the requirements of 10 CFR Part 73 to conduct an annual audit, the date of the letter that will be submitted to the NRC pursuant to Order EA-03-086 certifying that implementation of the plans is complete will be the effective date for determining commencement of the annual audit requirement period.

Because of the requirement for these plans to be fully implemented by October 29, 2004; the need to integrate the requirement of the revised DBT Order with the Orders issued February 25, 2002, January 7, 2003, and April 29, 2003; and the Commission's determination that it would be appropriate to exercise enforcement discretion to accommodate any transitional issues which may arise as licensees, in good faith, take reasonable actions to implement the specific requirements of the Orders, Entergy requests that enforcement discretion be exercised during the transition period until full implementation of the plans is accomplished and the physical plant modifications and security force training are complete. At that time, the revised plans will be fully implemented and the exercise of enforcement discretion will no longer be necessary.

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If you have any problems with the CD ROM or require additional information, please contact Rita Jackson at 601-437-2149 or rjack13@entergy.com.

This letter contains no new commitments.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of April, 2004.

Sincerely,



George A. Williams
Vice President Operations, GGNS

JSF/LAE/bal/rrj

Attachments One CD ROM containing the following file:
"001_Sup_Resp_to_4.29.2003_Orders_to_GGNS.pdf" including
Signed copy of cover letter
Attachment A, Security Plan, Training & Qualification Plan and Safeguards
Contingency Plan, with Appendices A, B, and C (Safeguards Information)
Attachment B, Action Completion Schedule
Attachment C, Deviations from NEI-03-12
Attachment D, Previous Exemptions to 10 CFR Part 73
Attachment E, Justifications for Three Alternatives (Safeguards Information)

REFERENCES

Entergy letter from Gary J. Taylor, CEO, to Document Control Desk dated June 3, 2003, Entergy Operations, Inc., Entergy Nuclear Operations, Inc – Response to Issuance of Orders to Modify License for Revised Design Basis Threat and Compensatory Measures Related to Security Force Training and Fitness-For-Duty (CNRO-2003-00025).

NRC Letters from Samuel J. Collins to Holders of Licenses for Operating Power Reactors as listed in Enclosure 2, dated April 29, 2003 Regarding Issuance of Order Requiring Compliance with Revised Design Basis Threat for Operating Power Reactors (EA-03-086), Issuance of Order for Compensatory Measures Related to Training Enhancements on Tactical and Firearms Proficiency and Physical Fitness Applicable to Armed Nuclear Power Plant Security Force Personnel (EA-03-039) and Issuance of Order for Compensatory Measures Related to Fitness-For-Duty Enhancements Applicable to Nuclear Facility Security Force Personnel (EA-03-038) (RBC-50030,50031 & 50027; GNRI 2003/00045,2003/00041& 2003/00040; 0CNA040310, 0CNA040311, & 0CNA040312; and ILN 03-0039,03-0040 & 03-0041 respectively)

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cc: all w/ cover letter only

Mr. J. L. Blount (M-ECH-62)
Mr. W. R. Campbell (M-ECH-66)
Mr. J. P. DeRoy (M-ECH-579)
Mr. W. A. Eaton (M-ECH-38)
Mr. T.L. Hoeg (GGNS Senior Resident)
Mr. D. E. Levanway (Wise Carter)

Mr. J. R. McGaha (M-ECH-65)
Mr. N. S. Reynolds (W&S)
Mr. L. J. Smith (Wise Carter)
Mr. G. J. Taylor (M-ECH-61)
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**Attachment B
to
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**Grand Gulf Nuclear Station
Action Completion Schedule**

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Grand Gulf Nuclear Station Action Completion Schedule

Design Basis Threat Order

Scheduled Completion

- | | |
|---|------------|
| • Vehicle Barrier Modifications | 10/29/2004 |
| • Defensive Position Modifications Completion | 10/29/2004 |
| • Delay Barriers Installed | 10/29/2004 |
| • AA/Insider Mitigation Program Implemented | 10/29/2004 |
| • Protective Strategy Tested & Validated | 9/15 /2004 |

Training Order

- | | |
|--|------------|
| • Range Upgrades Complete | 7/31/2004 |
| • Officer Training Complete | 10/29/2004 |
| • Three Year Training Program In Place | 10/29/2004 |

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**Attachment C
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**Grand Gulf Nuclear Station
Deviations from NEI-03-12**

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GGNS Deviations from NEI-03-12

1. There are no deviations to discuss.

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**Attachment D
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**Grand Gulf Nuclear Station
Previous Exemptions from 10CFR Part 73**

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