

Mr. William A. Eaton, Vice President
System Energy Resources, Inc.
Entergy Nuclear, M-ECH-38
1340 Echelon Parkway
Jackson, MS 39213

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 6 - SYSTEM
ENERGY RESOURCES, INC., EARLY SITE PERMIT APPLICATION FOR THE
GRAND GULF ESP SITE (TAC NO. MC1378)

Dear Mr. Eaton:

By letter dated October 16, 2003, System Energy Resources, Inc., (SERI) submitted its application for an early site permit (ESP) for the Grand Gulf ESP site.

The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of the Site Safety Analysis Report (SSAR) in your ESP application. The NRC staff has determined that additional information is necessary to continue the review. The topic covered in the requests for additional information (RAIs) contained in Enclosure 1 address the emergency planning information. These RAIs were sent to you via electronic mail on November 10, 2004, and were discussed with your staff by phone on November 23, 2004.

The staff notes that an ESP application review is different from the NRC's oversight of operating plant emergency planning. The Grand Gulf ESP application includes a "major features emergency plan," pursuant to 10 CFR 52.17(b)(2)(i), which takes into account various elements of the existing emergency plan at Grand Gulf Unit 1. For SERI's submittal, the staff's review includes an evaluation of those elements of the existing emergency plan, including the evacuation time estimate, that are reflected in the application. If any issues are identified that relate to the operating plant, they will be addressed separately as part of the reactor oversight process.

Receipt of requested information within 45 days of the date of this letter will support the NRC's efficient and timely review of SERI's ESP application. Please note that failure to provide a response in a timely fashion may result in a delay of completion of the staff's safety evaluation report.

W. Eaton

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If you have any questions or comments concerning this matter, you may contact me at (301) 415-1146 or rka@nrc.gov.

Sincerely,

Raj K. Anand, Grand Gulf ESP Project Manager
New Reactors Section
New, Research and Test Reactors Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No. 52-009

Enclosure: As stated

cc: See next page

W. Eaton

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New, Research and Test Reactors Program
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Docket No. 52-009

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cc: See next page

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PUBLIC
RNRP R/F
RAnand
WBeckner
LDudes

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JDyer/RBorchardt
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TSmith, OGC
JAnderson
BMusico
DBarss
NGilles
MScott

ADAMS ACCESSION NUMBER: ML043350120

OFFICE	RNRP/PM	EPPO/SC	OGC/NLO	RNRP/SC
NAME	RAnand	EWeiss	AFernandez	LDudes
DATE	/ /2004	/ /2004	/ /2004	/ /2004

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**Grand Gulf Early Site Permit (ESP)Application
Site Safety Analysis Report (SSAR)
Requests for Additional Information (RAIs)**

SSAR Part 4, Emergency Planning Information

RAI 13.3-60 [Supp. 2, V.A.2.b]

The Louisiana Peacetime Radiological Response Plan (LPRRP), Attachment 2, Section I.A, and Enclosure 1 to Attachment 2, Section B, states that responsibility for Parish planning an emergency response and for the development of the Parish Plan is consistent with provisions of the Tensas Parish Police Jury Ordinance for Emergency Planning. Specific reference to the ordinance(s) is not provided. In addition, authorities for emergency response activities of St. Joseph and Newellton were not provided. Identify the legal basis (e.g., reference-specific acts, codes or statutes) for Louisiana parish and municipal authorities, including the towns of St. Joseph and Newellton.

RAI 13.3-61 [Supp. 2, V.F.2]

Clarify communication arrangements with fixed and mobile medical support for the State of Mississippi in the Mississippi Radiological Emergency Preparedness Plan (MREPP), and with mobile medical support for Claiborne County in the Port Gibson/Claiborne County Radiological Emergency Preparedness Plan (PGCCRERP).

RAI 13.3-62 [Supp. 2, V.G.1]

The program descriptions for the coordinated distribution of information on a periodic basis in Annex J, Section III.A (Concept of Operation, Non-Emergency) to the MREPP and PGCCRERP, do not include special needs of the handicapped. Clarify how this information is disseminated to the general public on a periodic basis.

RAI 13.3-63 [Supp. 2, V.J.4.b]

MREPP, Annex O, has a map of the emergency planning zone (EPZ) showing evacuation routes, and reception and shelter facilities, but does not include a map of the Evacuation/Shelter Areas (e.g., Area 1, 2A/B, etc.). Provide a map of the Evacuation/Shelter Areas for MREPP, Annex O.

RAI 13.3-64 [Supp. 2, V.J.1.e]

The MREPP, Annex G and PGCCRERP, Annex G do not provide specific information on the distribution of potassium iodide (KI) to hospitals and nursing homes, and how those locations will be informed of the State Health Officer's decision of KI use. Describe the means for the use of radioprotective drugs for institutionalized persons within the Mississippi portion of the plume exposure EPZ, whose immediate evacuation may be infeasible or very difficult.

RAI 13.3-65 [Supp. 2, V.J.1.e]

The LPRRP does not specify, for either the State of Louisiana or Tensas Parish, the means (e.g., distribution prior to or during an emergency) for the use of radioprotective drugs for emergency workers and institutionalized individuals. While the determination of when to use KI is addressed, the communication protocol for this decision is not specified. Describe the means for the use of radioprotective drugs for emergency workers and institutionalized persons within the plume exposure EPZ in the State of Louisiana, whose immediate evacuation may be infeasible or very difficult.

RAI 13.3-66 [Supp. 2, V.K.3.a]

The PGCCRERP Annex F -- Appendix 10, Tab A (Hospital Survey for Radiation Accident Capabilities) states that Riverland Medical Center is capable of providing radiological support for individuals requiring assessment for internal contamination (whole body count or radiological assay). There is no guidance for offsite emergency workers to undergo additional assessment if they received exposure from radiation uptake (e.g., ingestion). Describe guidance established, related to bioassay or whole body counting, for determination of offsite emergency worker doses due to uptake of radioactive material.

RAI 13.3-67 [Supp. 2, V.L.1]

The LPRRP, Attachment 2 -- Enclosure I, Section H, Appendix I-1 (List Letters of Agreement) lists both the Riverland Medical Center (primary) and the Ochsner Foundation (secondary) for emergency medical services. The LPRRP, Tab 2 to Chapter 10 (Hospitals Capable of Treating Contaminated Injured Personnel) identifies Riverland Medical Center (Ferriday, LA) as the primary for Tensas Parish and Our Lady of the Lake Regional Medical Center (Baton Rouge, LA) as backup. In addition, Tab 1 to Chapter 14 (Letters of Agreement) does not list Riverland Medical Center as having an agreement with the State of Louisiana. Clarify inconsistencies between the LPRRP and the LPRRP, Attachment 2 -- Enclosure 1, regarding description of contacts and arrangements for local and backup hospital services.

RAI 13.3-68 [Supp. 2, V.L.2]

The information contained in the LPRRP, Tab 2 to Chapter 10 identified hospitals that have the capability to provide appropriate medical services to contaminated injured persons, including the location, and type of facility and capacity. Describe special radiological capabilities for the hospitals listed.

RAI 13.3-69 [Supp. 2, V.P.2 & 3]

Identify, by title, the Mississippi Emergency Management Agency (MEMA) individual/position with the overall authority and responsibility for radiological emergency response planning, and for the development and updating of emergency plans and coordination of these plans with other response organizations.

RAI 13.3-70 [Supp. 2, V.P.3]

Identify, by title, the Louisiana Department of Environmental Quality (LDEQ) individual/position with authority and responsibility for updating of emergency plans, and coordination of these plans with other response organizations.

RAI 13.3-71 [Supp. 2, V.P.3]

Clarify how contacts and arrangements (i.e., letters of agreement) are updated in the MREPP, PGCCRERP, and the LPRRP.

RAI 13.3-72 [Supp. 2, V.G.1]

Per the MREPP, Annex J, Section III.A, the nuclear facility operator is responsible for making available for distribution literature on public actions in the event of an emergency. Clarify in Part 4, the applicant's responsibility making information available to offsite authorities for distribution.

RAI 13.3-73 [Supp. 2, II.A / RS-002]

In addition to evacuation, discuss other factors, such as availability of adequate shelter facilities based on local building practices and land use (e.g., outdoor recreational facilities, including camps, beaches, hunting and fishing areas) for temporary population areas, and any related significant impediments to the development of emergency plans.

RAI 13.3-74 [Supp. 2, II.A / App. 4, III]

Clarify whether the boundaries of the EPZ and evacuation protective action areas, used in Part 4, Section 2.2.1 (Evacuation Time Estimate Preliminary Analysis), were based on projected demography, topography, land characteristics, access routes and jurisdictional boundaries over the ESP period (e.g., 20 years). In addition, was the projected increase in site population due to proposed new reactor(s) considered with respect to vehicle queuing in the preliminary analysis.

RAI 13.3-75 [Supp.2, V.J.4]

MREPP, Annex R – Table 5 to Appendix 5, (Grand Gulf Nuclear Station [GGNS] Shelter Facilities)” and PGCCRERP, Annex F – Table B to Appendix 7 (GGNS Shelter Facilities), identify the total capacity for shelters in the State of Mississippi. LPRRP, Attachment 2 -- Enclosure I, Figure G-1a, “Reception Center and Shelter Listing,” lists three reception centers for the State of Louisiana. Describe plans to address shelter facility capacities based on any anticipated population increase within the plume exposure pathway.

RAI 13.3-76 [Supp. 2, V.J.3 / App. 4, II.A]

Describe the methodology used to calculate the 2002 permanent population estimate.

RAI 13.3-77 [Supp. 2, V.J.3 / App. 4, II.B]

Table 3-3 to the May 2003 evacuation time estimate (ETE) Evaluation Study considers special facilities and transient populations together instead of separate populations, which is consistent with assumption in the March 1986 ETE and Part 4. Assumption 2.2 to the May 2003 ETE Evaluation Study also indicated that, based on applicant's interpretation of NUREG-0654, the ETE need only consider evacuation of permanent and transient populations, since special facilities populations are evacuated separately. Clarify why evacuation estimates did not consider populations segments separately as identified in Appendix 4, Section II to NUREG-0654/FEMA-REP-1 (e.g., permanent residents, transients, and persons in special facilities).

RAI 13.3-78 [Supp. 2, V.J.3 / App. 4, II.B]

The transient population appears inconsistent in the Section 2.2.3.3 (Transient Population) to Part 4 and the May 2003 ETE Evaluation Study. Provide responses to the following ETE discrepancies:

- a. Table 3-3 (Special Facilities and Transient Populations 1986-2002) of the May 2003 ETE Evaluation Study states that the county hospital has a population of 56 on weekdays and 32 on weeknights and weekends. Verify the county hospital numbers for weeknight and weekend.
- b. Describe how the Young Men's Christian Association (YMCA) population estimates were determined in the May 2003 ETE Evaluation Study.
- c. Section 2.2.3.3 to Part 4 lists 800 campers from late May to end of August, but the May 2003 ETE Evaluation Study lists 120 campers per weekday/weekend/weeknight. Clarify discrepancy.
- d. Section 2.2.3.3 to Part 4 states that Grand Gulf Military Park can have between 250 and 300 visitors per day, but the May 2003 ETE Evaluation Study used 250, not 300, for the population estimate. Clarify rationale for the non-conservative population estimate.
- e. Section 2.2.3.3 to Part 4 states that there were 36,000 visitors at Lake Bruin State Park from July 2001 to June 2002. Provide information on how the estimate of 225 visitors per day was derived for the May 2003 ETE Evaluation Study.
- f. Provide rationale for the Lake Bruin County Club population decrease from 1986 to 2002, as shown in the May 2003 ETE Evaluation Study.
- g. Provide information on why the 2003 ETE Update showed a decrease in the number of people in the hunting/fishing camps from 1986 to 2002.
- h. Section 2.2.3.3 to Part 4 states that there are as many as 250 fishermen on the weekends and 500 to 600 people on opening day for deer. They do not specify a total for other types of hunting (upland game and waterfowl). If opening day is on a weekend in November, there could be up to 600 deer hunters, 250 people fishing and an unspecified number of

small game/bird hunters. The estimate of 875 in the original 1986 ETE seems more realistic for a worst case. Provide information on how "600" was derived for the estimate for the May 2003 ETE Evaluation Study.

- i. Section 2.2.3.3 to Part 4 states that each camp could have up to 20 to 30 hunters on a weekend day, but the May 2003 ETE Evaluation Study assumed there are 8 to 10 hunters per hunting camp. Clarify discrepancy.
- j. Provide information on how the segment of the transient population associated with hunting/fishing will be notified.
- k. Section 2.2.3.3 to Part 4 reports that an outage requires 210 workers on a weekend day, 800 workers on a weekday, and 170 workers on a weeknight. The May 2003 ETE Evaluation Study estimates 80 workers on a weekend, 700 workers on a weekday, and 80 workers on a weeknight. Clarify discrepancies.
- l. Section 2.0 (Assumptions Used) of the May 2003 ETE Evaluation Study reports that a vehicle occupancy rate of 2.0 was assumed. Table 3-3 in the May 2003 ETE Evaluation Study used a factor of 1.0 on the weekends and weeknights. The 1986 ETE states that during the weekdays, employees were assumed to evacuate at a weighted average of 1.9 persons per vehicle. However, during a weeknight or weekend, employees at the site are also assumed to evacuate at the rate of 1.0 person per vehicle. Clarify discrepancies.
- m. Clarify whether commercial fisherman are considered part of the transient population.

RAI 13.3-79 [Supp. 2, V.J.3 / App. 4, II.C]

Provide responses to the following regarding the special facilities population:

- a. Section 2.2.3.6 (Public Facilities and Institutions) to Part 4, and 3.3.1 (Alcorn State University) of the May 2003 ETE Evaluation Study, report that 2000 students live on campus. These students are not included in the permanent resident population estimate, but are considered part the special facilities population segment. Part 4 and the May 2003 ETE Evaluation Study state that 1800 of these students have their own vehicles. Clarify how this number was derived, and whether the other 200 students are considered as part of the transport-dependent population.
- b. Section 2.2.3.6 (Public Facilities and Institutions) to Part 4, and 3.3.1 (Alcorn State University) of the May 2003 ETE Evaluation Study, report that there are 182 staff members and their families living in campus housing. This population is not included as part of the general population. The 182 staff members are added to the estimate for the total Alcorn State University population (3350). Clarify where the families of these staff members are addressed, and explain what population segment includes these families.
- c. State and local plans also do not provide information regarding school bus availability or capacity. Provide additional information regarding the availability of buses, drivers, and the process for mobilizing during an evacuation for the transport of students in Claiborne

County and Tensas Parish (e.g., can evacuations occur in a single trip or if return trips are necessary).

- d. Provide travel times for special facility populations, and information supporting the assumptions for the time distributions.

RAI 13.3-80 [Supp. 2, V.J.3 / App. 4, II.C]

Section 2.2.3.6 (Public Facilities and Institutions) to Part 4 states that on some football game days Alcorn stadium may have 20,000 or more visitors. These large crowds may occur 5 to 6 times in the fall. While Section 2.2.3.6 to Part 4 states that “traffic control in the campus areas is adequate to ensure that a large temporary traffic increase on the roads from a Alcorn State football game do not prevent or preclude other resident evacuees from accessing roadways to evacuate if necessary”, this assumption was not included in the 1986 ETE analysis, and therefore, has not been analyzed. Provide the following information in support of this conclusion:

- a. Identify possible queuing locations.
- b. Identify if traffic control devices in place or whether emergency personnel be used.
- c. Identify any potential problems with the on-ramps.
- d. Describe how will behavioral aspects play into the evacuation time.
- e. Clarify effect of adverse weather conditions during a night game on time estimates.
- f. Identify whether shuttles are used to take people to cars.
- g. Clarify whether the stadium traffic will create an outbound constraint to other traffic leaving the EPZ during an evacuation.
- h. Clarify whether the trip generation times for this special event population group includes time to return home and pack up, or pick up relatives, to evacuate as a family unit.

RAI 13.3-81 [Supp. 2, V.J.3 / App. 4, I.B]

Assumption 2.13 in the May 2003 ETE Evaluation Study indicates an estimated occupancy of two persons per vehicle for GGNS employees and 3 persons per vehicle for Alcorn State students. Assumption 2.15 indicates that most students and residents at Alcorn State have their own vehicles. In addition, the 2003 ETE Evaluation Study included an assumption of 60 school children per bus but did not describe the assumptions for jails, nursing homes or hospitals. Provide basis for occupancy rates, and vehicle occupancy factors for special facilities.

RAI 13.3-82 [Supp. 2, V.J.3 / App. 4, I.B]

Assumption 2.6 in the May 2003 ETE Evaluation Study states that traffic control by law enforcement officers will occur at key intersections. Clarify how this is modeled in NETVAC.

RAI 13.3-83 [Supp.2, II.A]

Section 1.5 to the March 1986 ETE indicates that the conditions were modeled: weekday fair weather, weekday adverse weather, night time fair weather, and weekend day fair weather. The weekend case was not modeled for adverse weather (assumed to be a thunderstorm), since recreational facilities would not be a peak capacity under such weather conditions. Clarify why adverse weather condition would be applicable for weekday, but not weekend day cases.

RAI 13.3-84 [Supp. 2, V.J.3 / App. 4, I.A]

Provide a figure(s) for the Plume Exposure Pathway (10 mile) EPZ with discernable prominent topographical features, political boundaries, and road segment numbers.

RAI 13.3-85 [Supp. 2, V.J.3 / App. 4, III]

Clarify whether the evacuation routes were field verified to determine if the assessment of changes adequately addresses potential impediments in the roadway network, and provide a description of the method(s) used.

RAI 13.3-86 [Supp. 2, V.J.3 / App. 4, I.C]

Clarify the evacuation route characteristics and modeling of traffic control measures, to support the NETVAC model results.

RAI 13.3-87 [Supp. 2, V.J.3 / App. 4, I.C, II.B & II.C]

Provide site-specific information used to develop trip generation times, per the guidance in NUREG/CR-4831, as basis for the time distributions. In addition, provide further information on the following issues related to trip generation times:

- a. Evacuation Analysis Area 8 in the May 2003 ETE Evaluation Study includes a large transient population during the peak weekend scenario. Clarify whether specific trip generation times for this group were developed, including an assessment of whether a portion of this group returns home to gather belongings and evacuate as a family unit.
- b. The LPRRP, Attachment 2 -- Enclosure 1 indicates that the School Board was responsible for providing buses and drivers for the evacuation of students, residents and transients from affected areas. Provide trip generation times for these population groups, which address the mobilization of availability of buses (e.g., single trip or return trips necessary).
- c. The MREPP, Annex F, Section II.F (Special Needs) identifies the use of buses and ambulances from neighboring communities, such as Natchez and Vicksburg, for transporting special needs persons in the event of an evacuation. Provide trip generation

times for this population group, which address the mobilization of availability of transportation (e.g., single trip or return trips necessary).

- d. The PGCCRERP, Annex F, Section II.F (Special Needs Facilities) states that the transportation of mobility impaired people and special needs populations is the responsibility of Claiborne County Civil Defense, and that support transportation (e.g., buses, wheelchair buses, ambulances) were available in neighboring counties. Clarify whether the mobilization of availability of transportation was included in the trip generation times estimated for the evacuation.
- e. Clarify whether return trips are considered in the trip generation times.

RAI 13.3-88 [Supp. 2, V.J.3 / App. 4, II.A]

Note 2 on Table 3-4 (GGNS Population Summary by Evacuation Area and Vehicle Demand - 2002) of the May 2003 ETE Evaluation Study states that one vehicle will evacuate for each household and there are 2.5 people/household. It also states for every 100 persons, 25 vehicles would evacuate. At 2.5 persons/household, 100 people would equate to 40 households, which would result in 40 vehicles, not 25. Clarify how vehicles are estimated based on the permanent population and what data was used in the initial NETVAC model.

RAI 13.3-89 [Supp. 2, V.J.3 / App. 4, II.A]

The permanent population is not divided into auto-owning versus transport dependent population for the March 1986 ETE or the May 2003 ETE Evaluation Study. Provide information on how the transport-dependent population was determined, and the how the number of vehicles that would be needed for that segment of the population was determined.

RAI 13.3-90 [Supp. 2, V.J.3 / App. 4, III]

Clarify differences in evacuation route roadway capacities, provided in Table 2-2 to Part 4 and source document (Table 4-1 to the May 2003 ETE Evaluation Study).

RAI 13.3-91 [Supp. 2, V.J.3 / App. 4, III]

Provide further information on the following issues related to potential impediments in the roadway network:

- a. The PGCCRERP, Annex F, Section II.H.4 (Evacuation Travel) indicates that potential impediments (natural disasters, seasonal impassability of roads, etc.) may create a major problem to the use of evacuation routes. Clarify whether evacuation roadways, known to be impacted by seasonal conditions (e.g., flooding), were considered in the ETE adverse weather scenarios.
- b. Clarify whether the impact of traffic passing through the EPZ, and any potential impact on an evacuation, was considered in the ETE analysis.

RAI 13.3-92 [Supp. 2, V.J.3 / App. 4, II.B]

Section 5.3 (Evacuation Preparation Times and Departure Distributions) to the March 1986 ETE states that the transport dependent population will begin to evacuate between T=75 minutes and T=135 minutes. The total evacuate time estimate shown in Table 6 (Evacuation Clear-Time Estimates) to the March 1986 ETE is 145-150 minutes. Clarify whether the transport dependent population segment was part of this estimate.

RAI 13.3-93 [Supp. 2, V.J.3 / App. 4, II.C]

Clarify inconsistencies between schools / special facilities listed in Table 2-1 (Plume Exposure EPZ Public Facilities and Institutions - Peak Populations) to Part 4, and special facilities listed in Sections 3.1 (Tensas Parish, Louisiana) and 3.2 (Claiborne County, Mississippi) to the May 2003 ETE Evaluation Study.

RAI 13.3-94 [Supp. 2, V.J.3 / App. 4, I.B]

Assumption 2.11 to the 2003 ETE Evaluation Study identifies that roadways would operate at 75 percent of capacity during adverse weather conditions, which is defined by applicant as a sudden rainstorm. Appendix 4 to NUREG-0654/FEMA-REP-1 indicates that adverse weather may affect both travel times and capacity. Clarify how traffic speeds are affected by adverse weather conditions, and impact on overall evacuation estimates.

RAI 13.3-95 [Supp. 2, V.J.3 / App. 4, I.B]

Part 4, Section 2.2.4.4 (Results of ETE Evaluation) states that the May 2003 evaluation report concluded that the radiological emergency response plans for the States of Louisiana and Mississippi, Claiborne County and Tensas Parish are more than adequate to address a nuclear emergency at GGNS that requires public protective actions. Clarify whether this evaluation considered the impact of the estimated 10.4 percent increase in plume exposure pathway population, between the March 1986 and May 2003 ETE studies, on offsite capabilities (e.g., monitoring/decontamination, congregate care center capacity, etc.).

RAI 13.3-96 [Supp. 2, V.J.3 / App. 4, I.B]

Section 6.0 (Summary and Conclusions) of the May 2003 ETE Evaluation Study states, "The Emergency Management Directors and the Highway Foremen in Tensas Parish in Louisiana and in Claiborne County in Mississippi all agree that the 1986 ETE, which demonstrates that the entire EPZ can be evacuated in any time of day or weather conditions in less than 3 hours, is still valid." Clarify whether conclusions from the May 2003 ETE Evaluation Study, and the preliminary analysis described in Part 4, Section 2.2.4.4 (Results of ETE Evaluation), have been reviewed by applicable State emergency management and transportation officials/agencies in accordance with NUREG/CR-4831.

GRAND GULF EARLY SITE PERMIT
SERVICE LIST

Grand Gulf

Mr. George A. Zinke
Manager, Project Management
Nuclear Business Development
Entergy Nuclear, M-ECH-683
1340 Echelon Parkway
Jackson, MS 39213

Mr. Michael A. Krupa
Acting Director, Nuclear Safety Assurance
Grand Gulf Nuclear Station
Bald Hill Road – Waterloo Road
Port Gibson, MS 39150

Mr. William A. Eaton
Vice President
System Energy Resources Inc.
Entergy Operations, M-ECH-38
1340 Echelon Parkway
Jackson, MS 39213

Ms. Patricia L. Campbell
Winston & Strawn
1400 L. Street, N.W.
Washington, DC 20005-3502

Mr. Michael D. Bourgeois
Manager, Project Management
Nuclear Business Development
Entergy Nuclear, M-ECH-683
1340 Echelon Parkway
Jackson, MS 39213

Ms. Frances G. Buford
Acting Director, Nuclear Safety Assurance
Entergy Nuclear South, M-ECH-414
1340 Echelon Parkway
Jackson, MS 39213

Mr. William K. Hughey
Sr. Manager, Business Development
Entergy Nuclear, M-ECH-683
1340 Echelon Parkway
Jackson, MS 39213

Mr. Bob Evans
Enercon Services Inc.
12850 Middlebrook Road, Suite 108
Germantown, MD 20874

Mr. George A. Williams
Site Vice President
Grand Gulf Nuclear Station
Bald Hill Road - Waterloo Road
Port Gibson, MS 39150
Federal, State and local

Attorney General
Department of Justice
State of Louisiana
P. O. Box 94005
Baton Rouge, LA 70804-9005

Attorney General
Asst. Attorney General
State of Mississippi
P. O. Box 220
Jackson, MS 39205-0220

Mr. Robert W. Goff, Program Director
Division of Radiological Health
Mississippi State Dept. of Health
P.O. Box 1700
Jackson, MS 39215-1700

Mr. Phil Bass, Director
Office of Pollution Control
Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289

Mr. Jerry Cain, Chief
Environmental Permits Division
Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289

Ms. Kathleen B. Blanco
Office of the Governor
P.O. Box 94004, State of Louisiana
Baton Rouge, LA 70804-9004

Governor Haley Barbour
Office of the Governor
P.O. Box 139, State of Mississippi
Jackson, MS 39205

Mr. Rick Foster, Director
Emergency Management for Tensas
Parish
P.O. Box 768
St. Joseph, LA 71366

GRAND GULF EARLY SITE PERMIT
SERVICE LIST

-2-

Military Department
Louisiana Dept. of Homeland
Security/Emergency Preparedness
Col. Mike Brown, Asst. Director
7667 Independence Boulevard
Baton Rouge, LA 70806

Mr. Robert R. Latham, Jr., Director
Mississippi Emergency Management
Agency
P.O. Box 4501, Fondren Station
Jackson, Mississippi 39296-4501

Ms. Bobbie Young, Director
Claiborne County Emergency Management
Agency
P. O. Box 558
Port Gibson, MS 39150

Mr. Thomas E. Reynolds
Co-RAC Chair
FEMA Region IV
3003 Chamblee-Tucker Road
Atlanta, GA 30341

Ms. Prosanta Chowdhury, Project Leader
Louisiana Department of Environmental
Quality
Office of Environmental Compliance
Nuclear Power Plant Emergency
Preparedness
P. O. Box 4312
Baton Rouge, LA 70821-4312

Ms. Lisa Hammond
Chief, Technological Services Branch
FEMA Region VI
800 N. Loop 288
Denton, TX 76209-3606

Ms. Vanessa E. Quinn, Chief
Radiological Emergency Preparedness
Section
Department of Homeland Security/FEMA
500 C Street, S.W.
Washington, D.C. 20472

Mr. Thomas P. Miller
U.S. Department of Energy
Headquarters - Germantown
19901 Germantown Road
Germantown, MD 20874-1290

Mr. Gary Wright, Manager
Division of Nuclear Safety
Illinois Emergency Management Agency
1035 Outer Park Drive
Springfield, IL 62704

Ms. Nancy Butler, Director
Harriette Person Memorial Library
606 Main St.
Port Gibson, MS 39150

Mr. David Lochbaum
Union of Concerned Scientists
1707 H Street, NW
Suite 600
Washington, DC 20006-3919

Mr. Paul Gunter
Director of the Reactor Watchdog Project
Nuclear Information & Resource Service
1424 16th Street, NW, Suite 404
Washington, DC 20036

Mr. James Riccio
Greenpeace
702 H Street, NW, Suite 300
Washington, DC 20001

Mr. Brendan Hoffman
Research Associate on Nuclear Energy
Public Citizens Critical Mass Energy
and Environmental Program
215 Pennsylvania Avenue, SE
Washington, DC 20003

Mr. Marvin Fertel
Senior Vice President
and Chief Nuclear Officer
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. Adrian Heymer
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Mr. Russell Bell
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

GRAND GULF EARLY SITE PERMIT
SERVICE LIST

-3-

Mr. Ernie H. Kennedy
Vice President New Plants
Nuclear Plant Projects
Westinghouse Electric Company
2000 Day Hill Road
Windsor, CT 06095-0500

Mr. Joseph D. Hegner
Lead Engineer - Licensing
Dominion Generation
Early Site Permitting Project
5000 Dominion Boulevard
Glen Allen, VA 23060

Dr. Regis A. Matzie
Senior Vice President and
Chief Technology Officer
Westinghouse Electric Company
2000 Day Hill Road
Windsor, CT 06095-0500

Mr. Thomas Mundy
Director, Project Development
Exelon Generation
200 Exelon Way, KSA3-N
Kennett Square, PA 19348

Mr. Glenn H. Archinoff
5275 Westview Drive
ACR Suite
Frederick, MD. 21703-8306

External Email
jim.mallay@framatome-anp.com
gzinke@entergy.com
eddie.grant@exeloncorp.com

Mr. Ed Wallace, General Manager
Projects
PBMR Pty LTD
PO Box 9396
Centurion 0046
Republic of South Africa

Mr. Tom Clements
6703 Guide Avenue
Takoma Park, MD 20912

Mr. Paul Leventhal
Nuclear Control Institute
1000 Connecticut Avenue, NW
Suite 410
Washington, DC 20036

Dr. Jack W. Roe
Vice President
Advanced Technologies & Laboratories
International, Inc.
20010 Century Boulevard, Suite 500
Germantown, MD 20874

Mr. Charles Brinkman
Westinghouse Electric Co.
Washington Operations
12300 Twinbrook Pkwy., Suite 330
Rockville, MD 20852

Dr. Glenn R. George
PA Consulting Group
130 Potter Street
Haddonfield, NJ 08033

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 6 -
SYSTEM ENERGY RESOURCES, INC., EARLY SITE PERMIT
APPLICATION FOR THE GRAND GULF ESP SITE (TAC NO.
MC1378)

ORIGINATOR: R. Anand

SECRETARY: C. Nagel

DATE: August 4, 2005

●●● ROUTING LIST ●●●

	NAME	DATE
1.	R. Anand	/ /04
2.	E. Weiss	/ /04
3.	A. Fernandez	/ /04
4.	L. Dudes	/ /04
5.		/ /04
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