



System Energy Resources, Inc.  
1340 Echelon Parkway  
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CNRO-2005-00054

September 16, 2005

U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attention: Document Control Desk

DOCKET: 52-009

SUBJECT: Grand Gulf Early Site Permit Application Revision 1 Corrections (TAC NO. MC 1378)

- REFERENCE:
1. System Energy Resources, Inc. (SERI) letter to USNRC – Early Site Permit Application (CNRO-2003-00054), dated October 16, 2003.
  2. USNRC letter to SERI – Request for Additional Information Letter No. 4 – System Energy Resources, Inc., Early Site Permit Application for the Grand Gulf ESP Site (TAC No. MC1378) (CNRI-2004-00014), dated August 13, 2004.
  3. USNRC letter to SERI – Request for Additional Information Letter No. 6 – System Energy Resources, Inc., Early Site Permit Application for the Grand Gulf ESP Site (TAC No. MC1378) (CNRI-2004-00022), dated December 8, 2004.
  4. SERI letter to USNRC – Response to Request for Additional Information Letter No. 4 - Early Site Permit Application for the Grand Gulf ESP Site (TAC NO. MC 1378), CNRO-2004-00069, dated October 19, 2004
  5. SERI letter to USNRC – Early Site Permit - Response to Request for Additional Information Letter No. 6 - Early Site Permit Application for the Grand Gulf ESP Site, CNRO-2005-00003, dated January 25, 2005
  6. SERI letter to USNRC – Early Site Permit - Grand Gulf Early Site Permit Application Revision 1 (TAC NO. MC 1378), CNRO-2005-00037, dated July 4, 2005

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CONTACT:

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On September 7, 2005, the NRC requested clarification of some apparent discrepancies in Revision 1 of the Emergency Planning Information, Part 4, of the GGNS ESP Application (Reference 6). On September 14, 2005 a conference call was conducted to discuss the discrepancies and the necessary corrective actions.

This letter transmits corrected information. Attachment 1 is a corrected summary of Part 4 changes in Revision 1. Included in Attachment 2 are corrections to Emergency Planning Information (EPI) Tables 2-1, 2-2, 4-1, and Figure 3-1. Attachment 3 provides responses to the requested actions provided by the NRC on September 7. Should you have any questions, please contact me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2005.

Sincerely,



George A. Zinke  
Project Manager  
System Energy Resources Inc.

Attachment 1:	GGNS ESP Application Part 4, Revision 1 Change Summary Corrected
Attachment 2:	GGNS ESP Application Part 4, Revision 1 Corrected Pages
Attachment 3:	Requested Actions / Responses

cc: Mr. R. K. Anand, USNRC/NRR/DRIP/RNRP  
Ms. D. Curran, Harmon, Curran, Spielberg, & Eisenberg, L.L.P.  
Mr. W. A. Eaton (ECH) (w/o enclosure)  
Mr. B. S. Mallett, Administrator, USNRC/RIV  
Mr. J. H. Wilson, USNRC/NRR/DRIP/RLEP

Resident Inspectors' Office: GGNS

**GGNS ESP APPLICATION - REVISION 1 CHANGE SUMMARY  
PART 4, EMERGENCY PLANNING INFORMATION  
(CORRECTED)**

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This change summary indicates the revision status for each Emergency Planning Information text section and includes a list of tables and figures revised. Revision 0 indicates no change to a text section other than the footer revision level. The SERI letter to the NRC associated with the changes (RAI responses, etc.) is included in the revision summary listing below.

<u>SECTION</u>	<u>REVISION</u>	<u>REFERENCE LETTER</u>
TOC/LOT/LOF	1	CNRO-2005-00003 (See also Note 2)
1.0	1	CNRO-2004-00069 (See also Note 2)
2.0	1	CNRO-2004-00069, CNRO-2005-00003, -00033 (See also Note 2)
3.0	1	CNRO-2004-00069, CNRO-2005-00003 (See also Note 2)
4.0	0	
APPENDIX A	0	

<u>EPI TABLES</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
2-1	1/24/05	CNRO-2005-00003
2-2	1/24/05	CNRO-2005-00003
4-1	10/19/04	CNRO-2004-00069

<u>EPI FIGURES</u>	<u>LETTER DATE</u>	<u>REF. LETTER</u>
2-1	10/19/04 1/24/05 6/21/05	CNRO-2004-00069 CNRO-2005-00003 CNRO-2005-00033
2-3	10/19/04 1/24/05 6/21/05	CNRO-2004-00069 CNRO-2005-00003 CNRO-2005-00033
2-6	1/24/05	CNRO-2005-00003
3-1	10/19/04	CNRO-2004-00069
3-2	10/19/04 1/24/05	CNRO-2004-00069 CNRO-2005-00003
3-3	10/19/04 1/24/05	CNRO-2004-00069 CNRO-2005-00003

**NOTES:**

- 1) EPI figures and tables not listed were not changed for Revision 1, other than to change the revision level on the figure or table page(s).
- 2) The versions of the text, tables and figures in the Revision 1 files submitted by CNRO-2005-00037, were previously submitted to NRC by the reference letter CNRO-2005-00003 in file "001\_ESP\_EPI\_Draft-Rev2\_01-24-05.pdf". These "draft Revision 2" EPI changes were subsequently included in Revision 1 of the application.
- 3) Other minor editorial, format and spelling changes are made; these are not always identified with revision bars in the Revision 1 files.

ESP APPLICATION PART 4, REVISION 1  
CORRECTED PAGES

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ESP APPLICATION PART 4, REVISION 1  
CORRECTED PAGES

Table 2-1 (2 pages)

Table 2-2 (2 pages)

Table 4-1 (7 pages)

Figure 3-1 (1 page)

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 PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 2-1

PLUME EXPOSURE EPZ PUBLIC FACILITIES AND INSTITUTIONS – PEAK POPULATIONS

Facility	Peak Population
<b>Schools</b>	
Tensas Elementary School	250
Tensas Academy	200
Newellton Head Start	115
Newellton High School	475
Davidson High School	210
Richardson School	210
Port Gibson High School	565
Port Gibson Middle School	453
Arthur W. Watson Elementary	993
Chamberlain-Hunt Academy	150
Claiborne Educational Foundation	84
Alcorn State University	3,350
<b>Day Care Centers</b>	
Amazing Grace	35
All God's Children	27
Child's	12
Concerned Citizen's	23
Little Kid's College	13
Loving Arms	6
Millcreek	17
New Haven Christian Academy	34

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PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 2-1 (Continued)

Facility	Peak Population
<b>Employers</b>	
Port Gibson Bank	22
Piggly Wiggly Store	26
MS Southern Bank	15
M&M	16
Bruce Hardwood	147
Anderson Tully	12
Newellton Elevator	15
LSU Experimental Station	25
Tensas Parish Courthouse	35
GGNS	800
<b>Special Facilities</b>	
Claiborne County Courthouse	30
Claiborne County Hospital	56 <sup>1</sup>
St. Charles Nursing Home	90
Tensas Parish Jail	10
Southern Home Care	96
Sta-Home Health Care	56
MS Home Care	88
Prestige Plaza	37
Claiborne County Nursing Center	155

**NOTES:**

1. Includes 32 beds, five doctors, ten registered nurses, six nurses' aides, and three X-ray technicians. (Reference 22)

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 PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 2-2  
 EVACUATION ROUTE ROADWAY CAPACITIES

Protective Action Area No.	County / Name	Primary Evacuation Route	Roadway Capacity (Vehicles/hr)
1	Claiborne Grand Gulf	U.S. 61 N to Vicksburg	1100 (GG Rd) 3800 (U.S. 61 N)
2a, 2b	Claiborne Kennison/Willows	U.S. 61 N and MS 462 E to Vicksburg	1400 (MS 462) 3800 (U.S. 61 N)
3a, 3b	Claiborne Between Little Bayou Pierre and Bayou Pierre	MS 18 E to Utica	1700 (MS 18 E)
4a	Claiborne Port Gibson	MS 547 S to MS 28 E to Hazlehurst	1500 (MS 547) 1400 (MS 28 E)
4b	Claiborne Between Gordon and Little Bayou Pierre	MS 547 S to MS 28 E to Hazlehurst	1500 (MS 547) 1400 (MS 28 E)
5a	Claiborne Westside	MS 552 E to U.S. 61 S to Natchez	3800 (MS 552 E) >1400 (U.S. 61 S)
5b	Claiborne Gordon Road	MS 552 E to U.S. 61 S to Natchez	>1400
6	Claiborne Alcorn State University	MS 552 E to U.S. 61 S to Natchez	3800 (MS 552 E) >1400 (U.S. 61 S)
7	Claiborne North of Big Black River	U.S. 61 N to Vicksburg	3800 (U.S. 61 N)
8	Tensas East Bank of Lake St. Joseph and East of Newellton	LA 608 N to LA 605 N to U.S. 65 N to Tallulah, LA.	<1000 (LA 608 and LA 605) >1400 (U.S. 65 N)
	West Bank of Lake St. Joseph	LA 608 W to LA 605 N to U.S. 65 N to Tallulah, LA.	<1000 (LA 608 and LA 605) >1400 (U.S. 65 N)

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 2-2 (Continued)

Protective Action Area No.	County / Name	Primary Evacuation Route	Roadway Capacity (Vehicles/hr)
9	Tensas West of LA 605, incl. Newellton	W to U.S. 65 N to Tallulah, LA.	>1400 (U.S. 65 N)
	East of LA 605, incl. Newellton	LA 887 W to LA 605 N to U.S. 65 N to Tallulah, LA.	<1000 (LA 887 & 605) >1400 (U.S. 65 N)
10	Tensas Outside of Lake Bruin	LA 604 N to LA 605 W to U.S. 65 S to Ferriday, LA.	<1000 (LA 605) >1400 (U.S. 65 S)
	Inside of Lake Bruin	LA 606 S to LA 604 S to LA 605 S to LA 128 W to U.S. 65 S to Ferriday, LA.	<1000 (LA 606, 604, 605, & 128) >1400 (U.S. 65 S)
11	Tensas Outside of Lake Bruin	LA 605 N to LA 605 W to U.S. 65 S to Ferriday, LA.	1000 (LA 605) >1400 (U.S. 65 S)
	St. Joseph area	LA 128 W to U.S. 65 S to Ferriday, LA.	1000 (LA 128) >1400 (U.S. 65 S)
12	Tensas S. of Yucatan Lake, incl. Lakamardia	LA 604 N to 605 W to U.S. 65 S to Ferriday, LA	<1000 (LA 604 and 605) >1400 (U.S. 65 S)
	Tensas N. and inside of Yucatan Lake	LA 608 W to LA 605 N to U.S. 65 N to Tallulah, LA.	<1000 (LA 608 & 605) >1400 (U.S. 65 S)

**SOURCE:**

- 1) Grand Gulf Nuclear Station Emergency Plan, Revision 48, 7/31/2002
- 2) Temple, J. M., Black Diamond Engineers, Inc., 2003, Evaluation Of Existing Evacuation Time Estimates And Analysis Of Potential Impediments To Protective Actions; Grand Gulf Nuclear Station

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1

NUREG-0654, REVISION 1, SUPPLEMENT 2, CROSS-REFERENCE

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
<b>A. Assignment of Responsibility (Organization Control)</b>	
1. Identify the state, local, federal and private sector organizations (including utilities) that are intended to be part of the overall response organization for EPZs.	3.1, 3.3
3. Include a description of contacts and arrangements pertaining to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the EPZs. Any written letters of agreement should be included. A signature page in the application may be appropriate for some organizations to signify their agreement.	3.3, 3.17, Appendix A
<b>B. Onsite Emergency Organizations</b>	
1. Identify the interfaces between and among the onsite functional areas of emergency activity, local services support, and State and local government response organization. This may be illustrated in a block diagram.	3.1, 3.2, 3.3, Figure 3-1
2. Identify the services to be provided by local agencies for handling emergencies (e.g., police, ambulance, medical, hospital, and fire fighting organizations). A description of the arrangements involving these services shall be included in the plan. Any written letters of agreement should also be included.	3.3, 3.12, Appendix A
<b>C. Emergency Response Support and Resources</b>	
1. The Federal Government maintains in-depth capability to assist licensees, States, and local governments through the Federal Radiological Emergency Response Plan. Each state and ESP applicant shall make provisions for requesting Federal assistance.	3.3
2. Identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services during an emergency.	3.3

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PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1 (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
3. Identify nuclear and other facilities and organizations that can be relied on to provide assistance in an emergency.	3.3
4. Include a description of the contacts and arrangements made with the response organizations identified above.	3.3, 3.17, Appendix A
<b>D. Emergency Classification System</b>	
1. An emergency classification scheme as set forth in Appendix 1 of NUREG-0654/FEMA-REP-1, Revision 1, or Regulatory Guide 1.101, Revision 3, must be established by ESP applicant but need not include plant-specific initiating conditions.	3.4
<b>E. Notification Methods and Procedures</b>	
1. Each organization shall describe mutually agreeable bases for notification of response organizations consistent with the emergency classification scheme set forth in Appendix 1 of NUREG-0654/FEMA-REP-1, Revision 1.	3.5
2. Each organization shall describe a method for alerting, notifying, and mobilizing emergency response personnel.	3.5
3. Each organization shall describe the administrative and physical means for notifying and promptly instructing the public within the plume exposure pathway EPZ.	3.5
<b>F. Emergency Communications</b>	
1. The communication plans for emergencies shall describe: <ul style="list-style-type: none"> <li>a. Provision for communications with contiguous State/local governments within the EPZ.</li> <li>b. Provision for communications as needed with Federal emergency response organizations.</li> <li>c. Provision for alerting and activating emergency personnel within each response organization.</li> </ul>	3.6
2. The communication arrangement for fixed and mobile medical support facilities shall be described.	3.6, 3.12

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1' (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
<b>G. Public Education and Information</b>	
<p>1. Each organization shall describe a program to provide a coordinated dissemination of information to the public on a periodic basis (at least annually) regarding how they will be notified and what their actions should be in an emergency. This program should include information on:</p> <ul style="list-style-type: none"> <li>- educational information on radiation</li> <li>- contact for additional information</li> <li>- protective measures, e.g. evacuation routes and relocation centers, sheltering, respiratory protection, radioprotection drugs</li> <li>- special needs of the handicapped and transient population</li> </ul> <p>Means for accomplishing this dissemination may include, but are not limited to: information in the telephone book, periodic information in utility bills, posting in public areas, and publications distributed on an annual basis.</p>	3.7
<p>2. Each organization shall describe a program for acquainting news media on a periodic basis (at least annually) with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.</p>	3.7
<b>H. Emergency Facilities and Equipment</b>	
<p>1. Describe a technical support center and an onsite operations support center in accordance with NUREG-0696.</p>	3.8.1, 3.8.2
<p>2. Describe an emergency operations facility from which evaluation and coordination of all licensee activities related to an emergency is to be carried out and from which the licensee shall provide information to Federal, State, and local authorities responding to radiological emergencies in accordance with NUREG 0696.</p>	3.8
<p>3. Each off-site organization shall describe an emergency operations center for use in directing and controlling response functions.</p>	3.8

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1 (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
<b>I. Accident Assessment</b>	
1. Provide a description of the contacts and arrangements made with off-site organizations for acquiring and evaluating meteorological information. Describe how suitable meteorological data will be made available to the State.	3.9
2. Describe the contacts and arrangements made for field monitoring within the plume exposure EPZ.	3.9
3. Describe contacts and arrangements to locate and track airborne radioactive plume, using either or both Federal and State resources.	3.9
<b>J. Protective Response</b>	
1. Describe the evacuation routes and transportation for on-site individuals to some suitable off-site location, including alternatives for inclement weather, high traffic density, and specific radiological conditions.	3.10, Figure 3-2
2. Describe a mechanism for recommending protective actions to the appropriate State and local authorities in accordance with the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001).	3.10
3. Prepare time estimates for evacuation within the plume exposure EPZ in accordance with Appendix 4 of NUREG-0654/FEMA-REP-1, Revision 1.	2.2
4. Each organization's concept for implementing protective measures for the plume EPZ shall be described, including items such as those listed below, if available. Where appropriate, a description of contacts and arrangements made with off-site agencies with emergency planning responsibilities must be included.	3.10
a. Maps showing evacuation routes, evacuation areas, shelter areas, and relocation centers in host areas.	3.10, Figures 3-1, 3-2, 3-3

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1 (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
b. Maps showing population districts around site. This shall be by evacuation areas. Each applicant shall also present the information in a sector format.	3.10, Figures 2-4, 2-5, 2-6
c. Proposed means for notifying all segments of the transient and resident population.	3.10
<b>K. Radiological Exposure Control</b>	
1. Describe guidelines on dose limits for: <ul style="list-style-type: none"> <li>a. Removal of injured persons.</li> <li>b. Undertaking corrective actions.</li> <li>c. Performing assessment actions.</li> <li>d. Performing field radiological measurements in the plume EPZ.</li> <li>e. Providing first aid.</li> <li>f. Performing personnel decontamination.</li> <li>g. Providing ambulance service.</li> <li>h. Providing medical treatment services.</li> </ul>	3.11
2. Describe an on-site radiation protection program to be implemented during emergencies, including methods to implement dose limits. General guidance on dose limits for workers performing emergency services can be found in EPA 400-R-92-001.	3.11
3.a. Describe how to determine doses received by emergency personnel involved in any nuclear accident, including volunteers.	3.11
3.b. Describe how to acquire and distribute dosimeters, both direct reading and permanent record devices.	3.11
4. Describe a decision chain for authorizing emergency workers to incur exposures in excess of the EPA dose limits for workers performing emergency services.	3.11

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 EARLY SITE PERMIT APPLICATION  
 PART 4 – EMERGENCY PLANNING INFORMATION

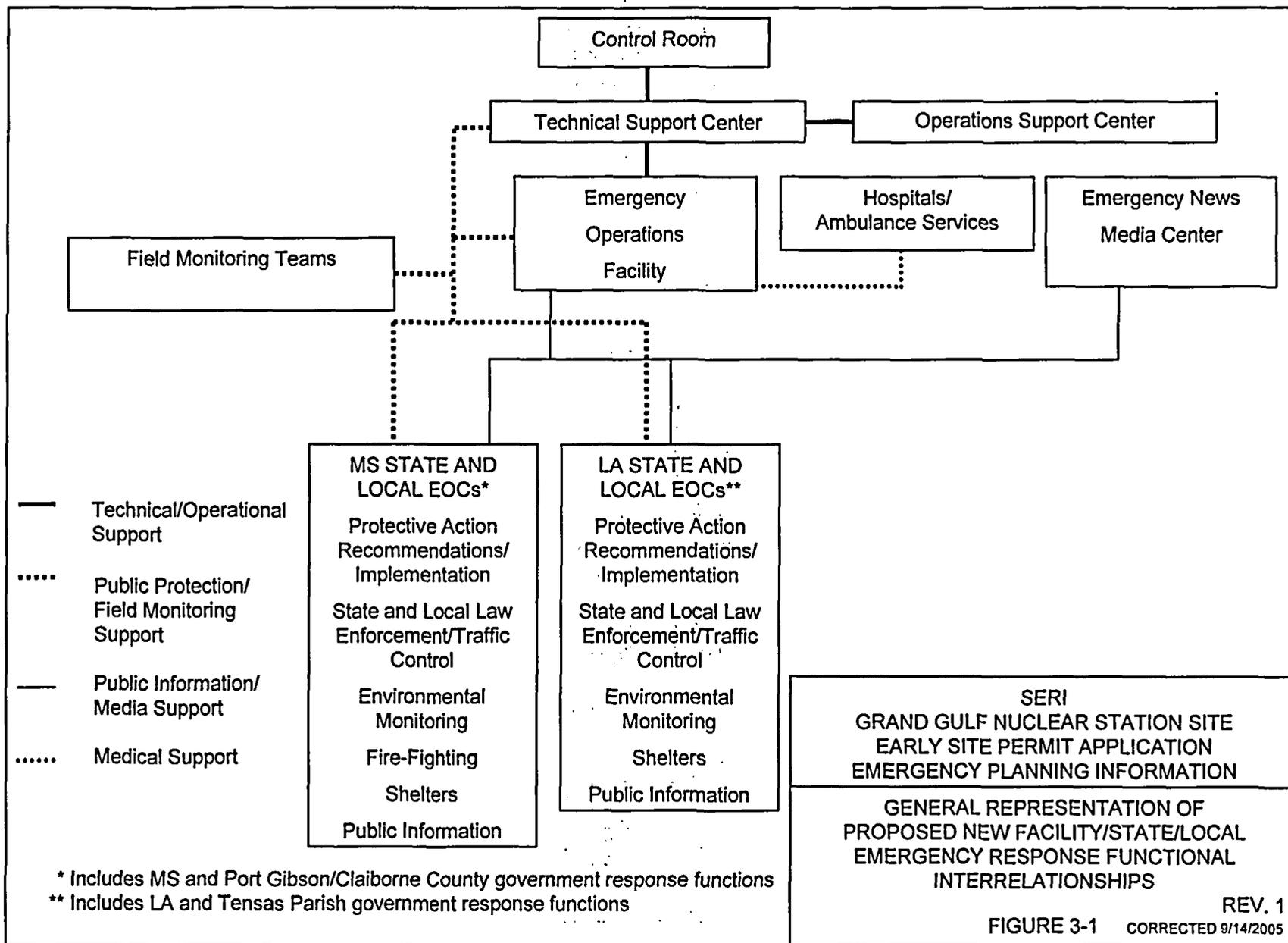
TABLE 4-1 (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
5.a. Specify action levels for determining the need for decontamination of emergency workers, equipment and vehicles, and the general public and their possessions.	3.11
5.b. Describe a means for decontamination of emergency personnel wounds, supplies, instruments and equipment.	3.11
<b>L. Medical and Public Health Support</b>	
1. Describe the contacts and arrangements made for local and backup hospitals and medical services having the capability for evaluation of radiation exposure and uptake.	3.12
<b>O. Radiological Emergency Response Training</b>	
1. Describe a training program for instructing and qualifying personnel who will implement radiological emergency response plans. Specialized internal training and periodic retraining shall be provided in the following categories: <ul style="list-style-type: none"> <li>a. Directors or coordinators of the response organizations</li> <li>b. Personnel responsible for accident assessment</li> <li>c. Radiation monitoring teams and radiation analysis personnel</li> <li>d. Police, security and fire fighting personnel</li> <li>f. First aid and rescue personnel</li> <li>g. Local support services personnel including Civil Defense /emergency services personnel</li> <li>h. Medical support personnel</li> <li>i. Personnel responsible for transmission of emergency information and instructions.</li> </ul>	3.15

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EARLY SITE PERMIT APPLICATION  
PART 4 – EMERGENCY PLANNING INFORMATION

TABLE 4-1 (Continued)

NUREG-0654, Revision 1, Supplement 2 Criterion	Implementing Plan Section
<b>P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans</b>	
1. Provide for the training of individuals responsible for the planning effort.	3.16
2. Identify by title the individual with the overall authority and responsibility for radiological emergency response planning.	3.16
3. Designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.	3.16
4. Update plans and agreements as needed.	3.16
5. Forward emergency response plans and approved changes to all organizations and appropriate individuals with responsibility for implementation of the plans. Date and mark revised pages to show where changes have been made.	3.16
6. Provide a specific table of contents and a cross-reference to the criteria in NUREG-0654/FEMA-REP-1, Revision 1, Supplement 2.	Table of Contents, Section 4



## REQUESTED ACTIONS / RESPONSES

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### Requested Actions:

**Action #1:** Provide basis for changes to Tables 2-1 and 2-2 in Revision 1 (which deviate from draft Revision 2), including reason for change and overall impact on ETE Preliminary Analysis.

### Response:

Table 2-1: The addition of the St. Charles Hospital to Table 2-1 in Revision 1 was incorrect. The Revision 1 ETE study indicated that this hospital was no longer active; it states "Other changes were made based on the removal of St. Charles Hospital from PAA 11 as an active hospital." Therefore, St. Charles Hospital should not have been added to the Table 2-1 in Revision 1 to Part 4 of the application.

Table 2-2: The draft Revision 2 version of Table 2-2 was created to make the table consistent with the Revision 1 ETE study. As noted in the ETE study summary of revisions, "Table 4-1 was modified slightly to reflect the traffic counts and estimates of roadway capacity are for 2002, not 1986-2002. The table was also modified in a few instances to correct inaccurate data about road capacity and to add new data about capacity (several PAAs evacuate on two or more roads, but only one capacity number was given in several instances - now if 3 roads are used, the capacity estimates for all 3 are listed)." The changes to draft Revision 2 Table were incorrectly transferred to the Revision 1 file version. The table has been corrected to the version indicated in the draft Revision 2 file (see Attachment 2 to this letter); in addition, the following minor corrections have been made to the table (Rev 1 Corrected) which correct the following from draft Revision 2:

- For PAA 3a, 3b, the primary evacuation route was incorrectly shown as MS 18 W; it is revised to MS 18 E as in the ETE Study.
- For PAA 6, the roadway capacity of 3800 applies to MS 552 E; it was incorrectly shown as MS 552 S in draft Revision 2.
- For PAA 9, the primary evacuation route in draft Revision 2 incorrectly indicated "W LA 605 to U.S. 65 N ..."; the route indicated in the ETE Study is "W to U. S. 65 N ...".
- Editorial changes to add "LA" and "U.S." in several places.
- Format change to add lines to separate the PAA information for clarity.

**Action #2:** Provide justification for deleting changes made to Figure 3-1 and Table 4-1 in draft Revision 2 made to address RAIs 13.3-13 & -57, or restore changes identified in draft Revision 2.

### Response:

The version of Figure 3-1 and Table 4-1 in the draft Revision 2 document should have been incorporated into the Revision 1 files. They were inadvertently omitted. Corrected Tables are included with this letter.

## REQUESTED ACTIONS / RESPONSES

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**Action #3:** Identify any other changes made in Revision 2, which are inconsistent with draft Revision 2 and RAI responses in CNRO-2004-00069.

**Response:**

A review of draft Revision 2 vs. Revision 1 submittal was performed. The review identified the following editorial changes not identified in the submittal attachment change summary:

- Capitalization of certain words such as "State" in Revision 1 in some places – this is an editorial change.
- Use of plurals vs singular, such as "24 hours per day, 7 days per week" – this is an editorial change. (Section 3.12)
- The name of the Ochsner Clinic was incorrectly changed in Revision 1 (rendering it misspelled) – in Revision 1 it is spelled "Oschner". (Section 3.12)
- The word "unit" was changed to "facility" for consistency with other parts of the application, in the first paragraph, second sentence of Section 3.17 – this is an editorial change.
- A period was added after the last bullet of Section 3.17, and after the first reference citation of Section 3.18 – these are editorial changes.

The review did not identify other changes indicated in the draft Revision 2 that were not carried forward to the Revision 1 document.

**Action #4:** Describe changes made to Figures 2-1 and 2-3 in CNRO-2005-00033, and basis/reason for changes in Section 2.1.1 and Figures 2-1 & 2-3.

**Response:**

The basis for these changes was given in CNRO-2005-00033; the UTM coordinates for the center of the proposed power block were changed as a result of an NRC comment / open item on the draft SER. These figures and the text section were impacted by this DSER Open Item response.

**Action #5:** Clarify why applicant letter CNRO-2004-00069 is not referenced in Attachment 1 to letter CNRO-2005-00037.

**Response:**

CNRO-2004-00069 was not referenced because it only generally discussed changes to the EP information in the application; no specific changed documents (draft revisions) were provided with the letter. It has been added to the revised/corrected summary of changes for the EPI Part 4 of the application for clarification (see Attachment 1 of this letter).