

August 25, 2006 (2:25pm)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

SYSTEM ENERGY RESOURCES, INC.)

(Early Site Permit for Grand Gulf ESP Site))

) Docket No. 52-009-ESP

) ASLBP No. 04-823-03-ESP

) August 25, 2006

**SYSTEM ENERGY RESOURCES, INC. COMMENTS ON
NRC STAFF'S PROPOSED FINDINGS OF FACT AND CONCLUSIONS
OF LAW IN THE MANDATORY HEARING**

I. INTRODUCTION

On April 19, 2006, the Atomic Safety and Licensing Board ("Board") in this proceeding issued an Order requesting, among other things, that the Nuclear Regulatory Commission Staff ("Staff") file with the Board proposed findings of fact and conclusions of law relevant to the findings which the Board must make in the Mandatory Hearing on the Grand Gulf application for an early site permit ("ESP").¹ The April 19 Order also requested that System Energy Resources, Inc. ("SERI") submit any "exceptions, additions, or objections" to the Staff's proposed findings of fact and conclusions of law no later than 30 days after the Staff files its preliminary proposals.² On August 11, 2006, the Staff submitted to the Board the "NRC Staff's Proposed Findings of Fact and Conclusions of Law in the Mandatory Hearing." In accordance with the Board's April 19

¹ See Order (Request for Documents and Briefings), unpublished Order, dated April 19, 2006, at 4 ("April 19 Order").

² *Id.* The due date for SERI's comments on the Staff's proposed findings of fact and conclusions of law was subsequently revised to August 25, 2006. See Order (Establishing Tentative Case Schedule), dated August 1, 2006, at 2 ("August 1 Order").



and August 1 Orders, SERI hereby submits its exceptions, additions, and objections to the Staff's proposed findings of fact and conclusions of law.

Overall, SERI believes that the Staff's proposed findings of fact and conclusions of law describe the procedural background and legal standards for the Grand Gulf ESP proceeding, and identify factual findings and legal conclusions with regard to safety and environmental matters that are supported by the record of this proceeding and that are relevant to the findings which the Board must make in the mandatory hearing. As described in Section II below, however, SERI has comments on the description of the legal standards applicable to this proceeding. Also, SERI's specific comments regarding individual findings of fact and conclusions of law are described in Section III below. References to applicable sections or particular findings in the Staff's submission are included, where appropriate, along with SERI's comments on such sections and findings.

II. LEGAL STANDARDS

Section III of the Staff's submission appropriately describes the legal standards applicable to the mandatory hearing for this proceeding, including Section 189a of the Atomic Energy Act (42 U.S.C. § 2239), 42 U.S.C. § 2235, 10 C.F.R. § 2.104(b)(2), and 10 C.F.R. §§ 52.18, 52.21, 52.24. The Staff also describes in Section III the findings the Board must make with regard to the safety and environmental issues in this proceeding.

A. Safety Findings

For hearings on uncontested issues, such as this, the Staff states that the Board, pursuant to 10 C.F.R. § 2.104(b)(2), must consider the following:

- (i) Without conducting a *de novo* evaluation of the application, whether the application and the record of the proceeding contain sufficient information, and the review of the application by the Commission's staff has been adequate to support affirmative findings on (b)(1)(i) through (iii) specified in [10 C.F.R.

§ 2.104] and a negative finding on (b)(1)(iv) specified in [§ 2.104] proposed to be made and the issuance of the construction permit proposed by the Director of Nuclear Reactor Regulation . . .³

SERI Comment:

In Section III of the Staff's submission, the Staff correctly notes that 10 C.F.R. § 2.104(b) refers only to hearings for construction permits,⁴ but states that the issues in § 2.104(b)(2) are also proper for Board consideration in hearings for ESPs. Several of the issues, however, identified in § 2.104(b)(1)(i) through (iii), referenced by the Staff in paragraph (i) above, are not ripe for Board consideration in an uncontested ESP hearing, including facility design information (§ 2.104(b)(1)(i)), technical qualifications of the applicant (§ 2.104(b)(1)(ii)), and financial qualifications of the applicant (§ 2.104(b)(1)(iii)). Therefore, consistent with the Commission's Hearing Notice⁵ for this proceeding, the Safety Findings the Board must make should be as follows:

(1) Whether the issuance of an ESP will be inimical to the common defense and security or to the health and safety of the public (Safety Issue 1); and, (2) whether, taking into consideration the site criteria contained in 10 CFR Part 100, a reactor, or reactors, having characteristics that fall within the parameters for the site, can be constructed and operated without undue risk to the health and safety of the public (Safety Issue 2).

B. Environmental Findings

Also in Section III of the Staff's submission, the Staff states that the Board has responsibility for three "baseline" environmental issues, regardless of whether the proceeding is contested or uncontested. According to the Staff, the Board must:

³ NRC Staff's Proposed Findings of Fact and Conclusions of Law in the Mandatory Hearing, at 4-5 (emphasis added).

⁴ *Id.* at n. 4.

⁵ *See* System Energy Resources, Inc; Notice of Hearing and Opportunity To Petition for Leave to Intervene Early Site Permit for the Grand Gulf ESP Site, 69 Fed. Reg. 2636 (January 16, 2004).

(1) Determine whether the requirements of section 102(2)(A), (C) and (E) of [NEPA] and the regulations in [10 C.F.R. Part 51, Subpart A] have been met;

(2) Independently consider the final balance among conflicting factors contained in the record of the proceeding with a view to determining the appropriate action to be taken; and

(3) Determine, *after weighing the environmental, economic, technical, and other benefits against environmental and other costs*, and considering reasonable alternatives, whether the construction permit . . . should be issued, denied, or appropriately conditioned to protect environmental values.⁶

SERI Comment:

NEPA Issue (3) above, which requires the Board to weigh the benefits and costs of the proposed action, is not consistent with the Commission's Hearing Notice for this proceeding or 10 C.F.R. §§ 52.17 and 52.18. Under 10 C.F.R. §§ 52.17 and 52.18, an applicant for an ESP must submit a complete environmental report and the NRC must issue an environmental impact statement that addresses all issues under NEPA related to construction and operation of a nuclear power plant on the proposed site, except for benefits of the project, such as need for power. Therefore, consistent with the Commission's Hearing Notice for this proceeding, the third environmental issue considered by the Board should be as follows:

(3) Determine, after considering reasonable alternatives, whether the ESP should be issued, denied, or appropriately conditioned to protect environmental values.

III. FACTUAL FINDINGS AND LEGAL CONCLUSIONS

Section IV, "Factual Findings and Legal Conclusions," and Section V, "Summary of Findings of Fact and Conclusions of Law," of the Staff's submission include approximately 640 proposed findings of fact and conclusions of law. Subject to the

⁶ NRC Staff's Proposed Findings of Fact and Conclusions of Law in the Mandatory Hearing, at 5 (emphasis added).

exceptions, additions, and objections described herein, SERI believes that the Staff's proposed findings of fact and conclusions of law reflect the record of this proceeding, including the applicable review standards, SERI's ESP Application, and the Staff's Safety Evaluation Report for an Early Site Permit (ESP) at the Grand Gulf Site ("SER") (NUREG-1840) and Environmental Impact Statement for an Early Site Permit (ESP) at the Grand Gulf Site ("EIS") (NUREG-1817).

SERI also believes, however, that given the fact that this proceeding is uncontested and that the Board has not yet identified any specific issues for hearing, the number and level of detail of the Staff's proposed findings of fact and conclusions of law may be excessive and disproportionate to the nature and status of this proceeding. Therefore, while SERI provides below specific comments on the Staff's proposed findings of fact and conclusions of law, SERI does not agree that this level of detail should act as a template or model for future, uncontested mandatory licensing hearings.⁷

SERI's exceptions, additions, and objections to the Staff's proposed findings of fact and conclusions of law are described below. The number associated with each exception, addition, or objection refers to a particular finding number in the Staff's submission.

6. Finding 6 should include the statement "some of the design values in the PPE have been modified to include margin," referencing SER at 1-4.

7. Finding 7 refers to 18 combined operating license ("COL") Action items.

However, Appendix A to the SER lists 26 COL Action items. Also, finding 7

⁷ See, e.g., *Gulf States Utilities Co.* (Blue Hills Station, Units 1 and 2), LBP-81-10, 13 NRC 382 (April 28, 1981) (partial initial decision on uncontested site suitability issues); *Louisiana Enrichment Services, L.P.* (National Enrichment Facility), LBP-06-17, 63 NRC __ (June 23, 2006) (final partial initial decision on uncontested issues).

refers to 8 Permit Conditions. However, Appendix A to the SER lists only 3 Permit Conditions. Generally, all COL Action Items and Permit Conditions listed in SER Appendix A should be identified by number in applicable findings.

11. The UTM coordinates in finding 11 are incorrect. The correct coordinates were supplied in the response to RAI 2.4-1, and Revision 1 of the Application. The correct UTM coordinates are N3,543,261 and E684,018 (SSAR Section 2.4.1.1). Note that finding 87 of the Proposed Findings of Fact and Conclusions of Law acknowledges that the correct coordinates were provided, but does not provide the coordinate numbers.

14. No citation is provided for finding 14. SERI suggests adding a citation to SER section 2.1.2, Exclusion Area Authority and Control.

18. The Permit Condition in finding 18 should be identified as "Permit Condition 1," referencing SER Appendix A.

30. Finding 30 currently states: "The one exception that the Applicant identified concerned the possibility of mishaps involving barge shipments of hazardous materials on the Mississippi River past the site that could lead to overpressures in excess of the RG 1.91 criterion of 1 psi due to insufficient separation distance." SERI suggests clarifying this statement as follows: "The one exception that the Applicant identified concerned the possibility of mishaps involving barge shipments of hazardous materials on the Mississippi River past the site that could lead to overpressures in excess of the RG 1.91 criterion of 1 psi due to insufficient separation distance *between the potential explosions of hazardous substances and the proposed site*" (emphasis added).

33. The COL Action Item in finding 33 should be identified as “COL Action Item 2.2-1,” referencing SER Appendix A.

42. Finding 42 should include the statement, “The staff concluded that the tornado site characteristic parameters proposed by the applicant were acceptable,” referencing SER at 2-38.

57. Finding 57 should include the statement, “The issue of interaction between the existing meteorological tower and the proposed facility’s cooling towers should be evaluated following the finalization of the cooling tower design and placement, as identified by the Staff in COL Action Item 2.3-1. SER at A-4.”

64. Finding 64 states: “The Staff stated that terrain modifications associated with the development of the ESP facility would be limited and localized.” To be consistent with the SER at 2-48, we suggest changing this statement to “The Staff stated that terrain modifications associated with the development of the ESP facility *are expected to be* limited and localized” (emphasis added).

73. Finding 73 should include the statement, “However, because little detailed design information is available for the nuclear plant(s) that may be constructed on the proposed site, the COL or CP applicant must assess the dispersion of airborne radioactive materials to the control room at the COL or CP stage, as identified by the Staff in COL Action Item 2.3-2. SER at A-4.” Also, finding 73 states “the Staff found that the Applicant has calculated representative atmospheric transport and diffusion conditions for the EAB and the LPZ. SER at 2-58.” The correct citation appears to be SER at 2-59.⁸

⁸ For the purposes of this review, SERI referred to the Safety Evaluation Report (NUREG-1840) and the Environmental Impact Statement (NUREG-1817) listed on NRC’s website at

79. Finding 79 states: "Accordingly, the long term dispersion characteristics (χ/Qs) cannot be established except at specific locations, in conjunction with D/Qs, as discussed below." No citation is provided for this statement.

81. Finding 81 should include the statement, "Any COL or CP applicant referencing this information should verify that the specific release point characteristics and specific locations of receptors of interest used to generate the ESP long-term (normal routine) atmospheric dispersion site characteristics bound the actual values provided at the COL or CP state, as identified by the Staff in COL Action Item 2.3-3. SER at A-4."

82. The "Depleted/No Decay" and "Undepleted/No Decay" column headings in finding 82 appear to have been interchanged; the data in the "Depleted/No Decay" column includes the "Undepleted/No Decay" data, and vice-versa. See SER Table 2.3.5-2, SER at 2-63.

88. The correct citation for finding 88 appears to be SER at 2-76, not SER at 2-75. Also, the statement regarding active drainage systems and potential impact on effluent pathways does not appear to be a correct interpretation of the SER wording. Active drainage issues in SER at 2-72 and 2-91 relate to flooding of the ESP site due to PMP events, which is the subject of COL Action Item 2.4-5, not effluent pathways.

95. Footnote 6 to finding 95 states: "While the information in ¶ 95 is not explicitly stated in the SER, the Staff intends to provide testimony to this effect with its prefiled written testimony answering Board questions." An intention to

<http://www.nrc.gov/reactors/new-licensing/esp/grand-gulf.html#safetveval>. The citation issues identified in this and later findings may be due to the use of different versions of these documents.

take a future action, such as providing testimony, is not a finding of fact or a conclusion of law.⁹

96. Footnote 7 to finding 96 states: “While the information in ¶ 96 is not explicitly stated in the SER, the Staff intends to provide testimony to this effect with its prefiled written testimony answering Board questions.” An intention to take a future action, such as providing testimony, is not a finding of fact or a conclusion of law.

97. Footnote 8 to finding 97 states: “While the information in ¶ 97 is not explicitly stated in the SER, the Staff intends to provide testimony to this effect with its prefiled written testimony answering Board questions.” An intention to take a future action, such as providing testimony, is not a finding of fact or a conclusion of law.

98. The citation to SER at 2-81, regarding historical flooding data for streams A and B, in finding 98 appears to be incorrect. The correct citation appears to be SER at 2-82. Also, the citation to SER at 2-88 in finding 98 appears to be incorrect. The correct citation appears to be SER at 2-90.

99. The citation to SER at 2-85 in finding 99 appears to be incorrect. The correct citation appears to be SER at 2-87. Also

100. The reference to SER at 2-88 in finding 100 appears to be incorrect. The correct citation appears to be SER at 2-90. Also, Table 2.4.14-1 is on page 2-144 of the SER, not page 2-141 as stated in finding 100. Further, footnote 10 states:

⁹ See April 19 Order, at 4, requiring Staff proposed findings of fact and conclusions of law to include “*explicit references to the record* which support the preliminary proposed findings of fact, and such citations as the NRC Staff concludes support the preliminary proposed conclusions of law” (emphasis added).

“While this is not explicitly stated in the SER, the Staff intends to provide testimony to this effect with its prefiled written testimony answering Board questions.” An intention to take a future action, such as providing testimony, is not a finding of fact or a conclusion of law.

101. Footnote 11 in finding 101 states: “While the information in ¶ 101 is not explicitly stated in the SER, the Staff intends to provide testimony to this effect with its prefiled written testimony answering Board questions.” An intention to take a future action, such as providing testimony, is not a finding of fact or a conclusion of law.

102. COL Action Item 2.4-3 is discussed on SER at 2-81, not SER at 2-80 as referenced in finding 102. Also, COL Action Item 2.4-5 is discussed on SER at 2-92, not SER at 2-89 as referenced in finding 102.

105. Citations in finding 105 do not appear to be accurate. Information referenced to SER at 2-81 appears to be from SER at 2-82; information referenced to SER at 2-84 appears to be from SER at 2-85; and, information referenced to SER at 2-89 appears to be from SER at 2-91. Also, finding 105 indicates the elevation of 103 ft MSL is the design project flood elevation; the correct design project flood elevation is 102.1 ft. MSL. SER at 2-64. The elevation of 103 ft MSL is the top of the levees to the west of the site, and is the maximum river level/elevation that would be experienced before the levees are over-topped; thus producing the cited 29 ft clearance to the proposed site grade of 132.5 ft MSL.

106. Citations in finding 106 do not appear to be accurate. The information regarding maximum wave height is referenced to SER at 2-96, but appears to be

from SER at 2-98. Also, information referenced to SER at 2-87 appears to be from SER at 2-89.

107. Citations in finding 107 do not appear to be accurate. The information regarding the Kentucky Dam is referenced to SER at 2-98, but appears to be from SER at 2-100.

108. Citations in finding 108 do not appear to be accurate. Information referenced to SER at 2-100 and 2-101 appears to be from SER at 2-103.

109. Citations in finding 109 do not appear to be accurate. The statement regarding seiche flooding referenced to SER at 2-103 appears to be from SER at 2-104.

110. Finding 110 accurately reflects the text referenced in the SER; but the SER statement is not correct. The normal river surface elevation is below 55 ft MSL; the floodplain portion of the ESP/GGNS site (the eastern portion of the site) is at elevations from 55 ft to 75 ft MSL. Average flood stage is about 76.5 ft MSL at the GGNS site as noted in SSAR 2.4.1.1. Low water reference plane is 37.5 ft MSL.

111. Citations in finding 111 do not appear to be accurate. The information regarding probable maximum tsunami flooding is referenced to SER at 2-105, but appears to be from SER at 2-107.

113. Finding 113 is consistent with the SER. However, SSAR Section 2.4.1.1 provides a mean annual flood elevation of 76.5 ft MSL, not 75 feet. SERI, however, believes that no substantive impact to the conclusion results from these minor differences.

114. Citations in finding 114 do not appear to be accurate. Information regarding the ten most destructive tsunamis is referenced to SER at 2-108, but appears to be from SER at 2-110.
116. Citations in finding 116 do not appear to be accurate. Information regarding the ice jams is referenced to SER at 2-109, but appears to be from SER at 2-110.
119. Citations in finding 119 do not appear to be accurate. Information regarding protection against channel diversions is referenced to SER at 2-116, but appears to be from SER at 2-118. Also, information referenced to SER at 2-89 appears to be from SER at 2-90.
123. Citations in finding 123 do not appear to be accurate. Information regarding COL Action Item 2.4-5 is referenced to SER at 2-120, but appears to be from SER at 2-122.
128. Finding 128 should include a reference to COL Action Item 2.4-7 at SER A-6. Also, finding 128 should include the statement, "The COL or CP applicant should design the ESP facility with a maximum withdrawal of 85,000 gpm from the Mississippi River to meet the makeup water requirement for the ESP facility, as identified by the Staff in COL Action Item 2.4-4. SER at A-5." Further, citations in finding 128 do not appear to be accurate. The discussion regarding the intake structure is referenced to SER at 1-114, but appears to be from SER at 2-116.
129. Finding 129 should include a reference to COL Action Item 2.4-1 at SER A-5. Also, citations in finding 129 do not appear to be accurate. The discussion

regarding a visual inspection of the site is referenced to SER at 2-115, but appears to be from SER at 2-117. Similarly, COL Action Item 2.4-6 is referenced to SER at 2-115, but appears to be from SER at 2-117.

132. Citations in finding 132 do not appear to be accurate. The discussion regarding makeup water is referenced to SER at 2-63, but appears to be from SER at 2-65. Also, information referenced to SER at 2-121 appears to be from SER at 2-123.

133. Citations in finding 133 do not appear to be accurate. The discussion regarding an intake structure on the east bank of the Mississippi is referenced to SER at 2-121, but appears to be from SER at 2-124. Also, information referenced to SER at 2-122 appears to be from SER at 2-124.

134. Citations in finding 134 do not appear to be accurate. The discussion regarding historical low-flow surface elevation is referenced to SER at 2-124, but appears to be from SER at 2-128.

136. Citations in finding 136 do not appear to be accurate. The discussion regarding groundwater is referenced to SER at 2-126, but appears to be from SER at 2-128.

137. Citations in finding 137 do not appear to be accurate. The discussion regarding maximum consumption of groundwater is referenced to SER at 2-127, but appears to be from SER at 2-129.

138. Citations in finding 138 do not appear to be accurate. The discussion regarding "Groundwater Atlas of the United States" is referenced to SER at

2-130, but appears to be from SER at 2-132. Also, information referenced to SER at 2-131 appears to be from SER at 2-134.

139. Citations in finding 139 do not appear to be accurate. The discussion of COL Action Item 2.4-8 is referenced to SER at 2-131, but appears to be from SER at 2-133.

140. Finding 140 should include a reference to COL Action Item 2.4-9 at SER A-6. Also, citations in finding 140 do not appear to be accurate. The discussion of “perched water zones” is referenced to SER at 2-132 and the discussion of “dewatering well system” is referenced to SER at 2-131, but the correct citation for both references appears to be SER at 2-134.

142. Citations in finding 142 do not appear to be accurate. The discussion regarding radioactive material releases to ground water is referenced to SER at 2-140, but appears to be from SER at 2-142.

171. Finding 171 states “In order to evaluate the Applicant’s surface faulting investigations, the Staff sought the assistance of a contractor from the Brookhaven National Laboratory. SER at 2-231.” SERI believes that this statement would be more accurate with the following wording: “In order to evaluate the Applicant’s *geotechnical investigations*, the Staff sought the assistance of a contractor from the Brookhaven National Laboratory. SER at 2-231” (emphasis added).

205. Finding 205 should include a reference to COL Action Item 11.1-1 at SER A-8. Also, finding 205 states “In addition, the Staff determined that a COL applicant will need to provide detailed information on the solid waste management system used to process the radioactive gaseous and liquid effluents.”

While this statement accurately reflects the wording in the SER, its substantive content is incorrect. The solid waste management system is not used for processing waste from the gaseous or liquid waste management systems. The solid waste management system controls, collects, handles, processes, packages, and temporarily stores solid waste generated by the plant prior to shipping the waste offsite.

257. Finding 257 should include a reference to COL Action Item 13.6-1 at SER A-8.

282. Finding 282 references "Enercon," but does not define Enercon's role with respect to the ESP. Suggest adding a statement that describes Enercon's role as the primary contractor for development of the ESP application. SER at 1-6.

329. Finding 329 states: "no other industrial, commercial, institutional, or residential structures are on the Grand Gulf site other than a private hunting lodge on the extreme southwest corner." However, the FEIS lists a 2-acre residential property within the site boundary. *See* FEIS at 2-5.

360. Finding 360 contains the following statement: "(Environmental justice refers to a Federal policy under which each executive agency identifies and addresses, as appropriate, disproportionately high and adverse impacts on human health or environmental effects of its programs, policies, and activities on minority or low-income populations.)" SERI suggests that a citation be provided for this statement.

413. Finding 413 states: "all major construction activities are expected to occur outside of the GGNS Unit 1 protected area boundary but inside the restricted site

boundary (exclusion area).” The “restricted site boundary” and the “exclusion area” are two different areas; the restricted site boundary being the boundary for the entire site (site boundary), and the exclusion area being that area within an approximate 0.5 mi radius of the power block center point. Not “all” construction areas are within the exclusion area boundary; for example, the intake at the river's edge. SERI suggests changing “all” to “most.”

419. Finding 419 states “Accordingly, we find the Staff’s review of these matters was adequate.” SERI suggests that this statement reference the matters to which the finding relates.

472. No citation is provided for finding 472. SERI suggests adding a citation to FEIS at 6-1.

514. No citation is provided for finding 514. SERI suggests adding a citation to FEIS at 7-10.

524. No citation is provided for finding 524. SERI suggests adding a citation to FEIS at 8-1.

527. No citation is provided for finding 527. SERI suggests adding a citation to FEIS at 8-3.

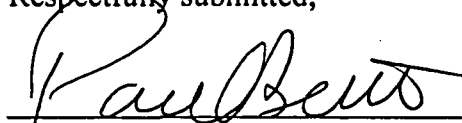
544. No citation is provided for the concluding sentence for finding 544. SERI suggests adding a citation to FEIS at 8-17.

640. Finding 640 refers to “reactor or reactors having characteristics that fall within the parameters for the site.” SERI suggests rewording this statement to “reactor or reactors having characteristics that fall within the *PPE parameters used for evaluation of the ESP site*” (emphasis added).

III. CONCLUSION

Subject to the above exceptions, additions, or objections, SERI believes that the Staff's proposed findings of fact and conclusions of law accurately describe the procedural background and legal standards for this proceeding, and identify factual findings and legal conclusions with regard to safety and environmental matters that are supported by the record of this proceeding and that are relevant to the findings which the Board must make in the Mandatory Hearing.

Respectfully submitted,



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Dated at Washington, District of Columbia,
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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of)	
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SYSTEM ENERGY RESOURCES, INC.)	Docket No. 52-009-ESP
)	
(Early Site Permit for Grand Gulf ESP Site))	ASLBP No. 04-823-03-ESP

CERTIFICATE OF SERVICE

I hereby certify that copies of "System Energy Resources Inc. Comments on NRC Staff's Proposed Findings of Fact and Conclusions of Law in the Mandatory Hearing" in the captioned proceeding have been served as shown below by deposit in the United States Mail, first class, this 25th day of August, 2006. Additional service has also been made this same day by electronic mail as shown below.

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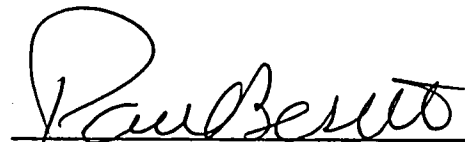
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