



Entergy Operations, Inc.  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, New York  
10601

PRM-50-83  
(72FR14713)

John F. McCann  
Director  
Nuclear Safety & Licensing

4

ENOC-07-00019

DOCKETED  
USNRC

June 12, 2007

June 12, 2007 (12:39pm)

Ms. Annette L. Vietti-Cook  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

ATTN: Rulemakings and Adjudications Staff

SUBJECT: Comments on PRM-50-83, the Petition for Rulemaking Submitted by the  
Project on Government Oversight and Union of Concerned Scientists  
(72 Fed. Reg. 14713)

Dear Ms. Vietti-Cook:

Entergy is pleased to offer its comments in the above captioned petition.

In PRM-50-83, the petitioners requested that 10 CFR 50 be amended in a way similar to current Appendix E to require periodic exercises involving licensees and applicable local, state and federal entities to demonstrate their capabilities to protect from radiological sabotage greater than the design basis threat (DBT) level. Since the Department of Homeland Security (DHS), through Homeland Security Presidential Directive HSPD-7, "*Critical Infrastructure Identification, Prioritization, and Protection*" and HSPD-8, "*National Preparedness*," is responsible for the oversight and coordination of local, state, and federal entities for all terrorist threats including those above the DBT, Entergy argues an amendment to 10 CFR 50 is not appropriate.

On June 12, 2007 the Nuclear Energy Institute (NEI) submitted comments in the above captioned matter arguing the subject petition should be denied because the NRC and DHS have been and are working together to develop and improve emergency preparedness for a terrorist attack through federal initiatives such as comprehensive review programs and integrated response planning efforts.

Entergy concurs with the NEI position. Since these actions are already underway, there is no need to initiate new, redundant actions to address this issue.

For the foregoing reasons, the subject petition for rulemaking should be denied.

Template = SECY-067

SECY-02

If you should have any questions or require additional information, please contact Jerry Burford at 601-368-5755.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Burford', written in a cursive style.

JFM/lae/bal

cc: Mr. Douglas J. Walters  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

**From:** Carol Gallagher  
**To:** SECY  
**Date:** Tue, Jun 12, 2007 11:18 AM  
**Subject:** Comment letter on PRM-50-83

Attached for docketing is a comment letter on PRM-50-83 from John F. McCann, Entergy, that I received via the rulemaking website on 6/12/07.

Carol

**Mail Envelope Properties** (466EB920.449 : 5 : 35764)

**Subject:** Comment letter on PRM-50-83  
**Creation Date** Tue, Jun 12, 2007 11:17 AM  
**From:** Carol Gallagher  
  
**Created By:** CAG@nrc.gov

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MESSAGE	527	Tuesday, June 12, 2007 11:17 AM
1848-0003.pdf	126092	Tuesday, June 12, 2007 11:13 AM

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