



Entergy Operations, Inc.
1340 Echelon Parkway
Jackson, MS 39213

William K. Hughey
Director, Licensing – New Plant
(601) 368-5327
whughey@entergy.com

CNRO-2008-00015

April 11, 2008

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

5200024

DOCKET: NRC Project No. 744

SUBJECT: Grand Gulf Unit 3 COL Application
Response to NRC Request for Additional Information – FEMA COL
Application Review

- REFERENCE:
1. Entergy Operations, Inc. letter CNRO-2008-00008 to the NRC, *Application for Combined License for Grand Gulf Unit 3*, dated February 27, 2008.
 2. Letter from FEMA to the NRC, *FEMA Acceptance Review of the Offsite Emergency Response Plans for the Combined License (COL) Application – Entergy for the Grand Gulf Site*, dated March 27, 2008

Entergy Operations, Inc. (Entergy) submitted to the NRC a combined license application (COLA) for Grand Gulf Nuclear Station, Unit 3, on February 27, 2008 (Reference 1).

In a telephone conversation on March 31, 2008, the NRC staff informed Entergy that they had received a letter (Reference 2) from the Federal Emergency Management Agency (FEMA) regarding their review of the Grand Gulf Unit 3 Emergency Plan, which is Part 5 of the Grand Gulf COLA. Specific to Part 5, FEMA identified the need for additional information and/or clarifications in order to support their review of the application. Entergy's responses to FEMA's requests are contained in Attachment 1.

This letter contains commitments identified in Attachment 2.

Should you have any questions, please contact me or Tom Williamson at (601) 368-5786.

Sincerely,

WKH/ghd

- Attachments:
1. Response to FEMA COL Application Review
 2. List of Regulatory Commitments

D079
NRO

cc:

Mr. T. A. Burke (ECH)
Mr. S. P. Frantz (Morgan, Lewis & Bockius)
Mr. P. D. Hinnenkamp (ECH)
Mr. B. R. Johnson (GE-Hitachi)
Ms. M. Kray (NuStart)

NRC Project Manager – GGNS COLA
NRC Director – Division of Construction Projects (Region II)
NRC Regional Administrator – Region IV
NRC Resident Inspectors' Office: GGNS

RESPONSE TO FEMA COL APPLICATION REVIEW

FEMA Item #1

FEMA has requested the following supporting plans/procedures referenced in the Mississippi Radiological Emergency Preparedness Plan (Annex N).

1. Natchez/Adams County Radiological Emergency Preparedness Plan
2. Copiah County Radiological Emergency Preparedness Plan
3. Hinds County Radiological Emergency Preparedness Plan
4. Warren County Radiological Emergency Preparedness Plan
5. MEMA Fixed Nuclear Facility emergency Public Information Standard Operating Procedures
6. MEMA TCP/ACP Handbook for Radiological Emergencies
7. MEMA Monitoring and Decontamination Operations Handbook
8. MSDH/DRH Manual of Radiological emergency Response Team Procedures
9. Southern Mutual Radiological Assistance Plan

Entergy Response

In accordance with 10 CFR 52.79(a)(21), the COL application (Reference 1) included copies of the state and local plans referenced in the Grand Gulf Nuclear Station Unit 3 Emergency Plan, which is Part 5 of the application; the Mississippi Radiological Emergency Preparedness Plan (MREPP) was included in Part 5. Annex N of the MREPP, *Supporting Plans and Procedures*, provides a listing of supporting plans/procedures, both county and state that either augment or complement the MREPP. This listing contains the above items 1 - 9.

To facilitate the FEMA offsite technical review, Entergy is working with the Mississippi Emergency Management Agency (MEMA) to obtain copies of Items 1 – 4. It is our understanding that FEMA may already have copies of these items; additionally, we note that 10 CFR 50.47(a)(2) states in part, "Any other information already available to FEMA may be considered in assessing whether there is reasonable assurance that the plans can be implemented."

Entergy has obtained copies of Items 5 – 8 from MEMA, which are considered implementing procedures and, thus, available for inspection if needed for the FEMA review. 10 CFR 52.79(a)(21) does not require emergency plan implementing procedures to be submitted with the application.

The Southern Mutual Radiological Assistance Plan (SMRAP) referenced in the MREPP (Item 9) provides a mechanism for coordinating radiological emergency assistance capabilities among participating states. The SMRAP is not an emergency plan in the context of 10 CFR 52(a)(21), 10 CFR 50.47, or 10 CFR 50 Appendix E. The current revision of the SMRAP (December 2007) is publicly available via the internet at the Southern States Energy Board website www.sseb.org/publications/smrap2006.pdf.

FEMA Item #2

FEMA identified, "In regards to the review for the Louisiana REP plans, the cross-reference to P.8 criterion in the Tensas Parish plan includes a reference to '**Attachment 3 pp iii and v**' which was not included in the application materials."

Energy Response

The Tensas Parish Radiological Emergency Response Plan (TPRERP) is Enclosure 1 to Attachment 2, *Grand Gulf Nuclear Station*, of the Louisiana Peacetime Radiation Response Plan (LPRRP) Revision 10, October 2005. No reference to the P.8 criterion could be located in the TPRERP. However, such a reference is contained on page viii of Attachment 2.

Criterion P.8 of NUREG-0654 states, "Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these [NUREG-0654] criteria." The Table of Contents and the Cross-Reference for Attachment 2 are located on page iv and on pages vi – viii, respectively. Attachment 2 was included in the application materials.

Given that Attachment 3 pertains to River Bend Station located in St. Francisville, Louisiana (see page iii of the LPRRP), it is Entergy's assessment that the reference to Attachment 3 is an administrative error, and the correct reference should be "Attachment 2 pp iv – viii."

FEMA Item #3

FEMA stated, "The reference '*Implementing Procedures*' is stated as a cross-reference to the following criteria listed below. This is a vague cross-reference and needs to be plan/procedure specific.

1. Basic Plan, Sections IV and VI attachments: *Implementing Procedures*
2. Chapter 6, Section III.B attachments: *Implementing Procedures*
3. Basic Plan, Section VI.A.5 attachments: *Implementing Procedures*
4. Chapter 4; Chapter 5, Sections IV.B attachments: *Implementing Procedures*
5. *Implementing Procedures*
6. *Implementing Procedures*
7. Chapter 7, Section III.E.3: *Implementing Procedures*
8. *Implementing Procedures*

9. Basic Plan, Section VI.A: *Implementing Procedures*

10. *Implementing Procedures*"

Entergy Response

Entergy understands that the Louisiana Department of Environmental Quality (LDEQ) operates from the Louisiana Peacetime Radiological Response Plan (LPRRP) itself and does not utilize implementing procedures. As such, LDEQ is currently revising the LPRRP to remove the references to implementing procedures. Once approved by LDEQ and provided to Entergy, Entergy will submit the revised LPRRP to the NRC.

LIST OF REGULATORY COMMITMENTS

The following table identifies an action to which Entergy has committed in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Obtain county plans from MEMA.	X		When available from MEMA
Submit revised LPRRP to the NRC.	X		When provided by LDEQ