



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

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

G3NO-2008-00024

December 4, 2008

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

DOCKET: No. 52-024

SUBJECT: Responses to NRC Requests for Additional Information, Letter No. 20
(GG3 COLA)

REFERENCE: NRC Letter to Entergy Nuclear, *Request for Additional Information
Letter No. 20 Related to the SRP Section 14.03.10 for the Grand Gulf
Combined License Application*, dated November 4, 2008 (ADAMS
Accession No. ML083080563).

Dear Sir or Madam:

In the referenced letter, the NRC requested additional information on eight items to support the review of certain portions of the Grand Gulf Unit 3 Combined License Application (GG3 COLA). The responses to the following Requests for Additional Information (RAIs) in the referenced letter are provided in Attachments 1 through 8 to this letter as follows:

1. RAI Question 14.03.10-1, ITACC-1: ITAAC
2. RAI Question 14.03.10-2, ITACC-1: ITAAC
3. RAI Question 14.03.10-3, ITACC-1: ITAAC
4. RAI Question 14.03.10-4, ITACC-1: ITAAC
5. RAI Question 14.03.10-5, ITACC-1: ITAAC
6. RAI Question 14.03.10-6, ITACC-1: ITAAC
7. RAI Question 14.03.10-7, ITACC-1: ITAAC
8. RAI Question 14.03.10-8, ITACC-1: ITAAC

DOBB
MRO

Should you have any questions, please contact me or Mr. Tom Williamson of my staff. Mr. Williamson may be reached as follows:

Telephone: (601) 368-5786

Mailing Address: 1340 Echelon Parkway
Mail Stop M-ECH-21
Jackson, MS 39213

E-Mail Address: twilli2@entergy.com

This letter contains commitments as identified in Attachment 9.

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

Executed on December 4, 2008.

Sincerely,

A handwritten signature in cursive script, appearing to read "WKH", is written in black ink.

WKH/ghd

- Attachments:
1. Response to RAI Question No. 14.03.10-1
 2. Response to RAI Question No. 14.03.10-2
 3. Response to RAI Question No. 14.03.10-3
 4. Response to RAI Question No. 14.03.10-4
 5. Response to RAI Question No. 14.03.10-5
 6. Response to RAI Question No. 14.03.10-6
 7. Response to RAI Question No. 14.03.10-7
 8. Response to RAI Question No. 14.03.10-8
 9. Regulatory Commitments

cc (e-mail unless otherwise specified):

NRC

NRC Project Manager – Grand Gulf Unit 3 COLA
NRC Project Manager – North Anna Unit 3 COLA
NRC Director – Division of Construction Projects (Region II)
NRC Regional Administrator - Region IV
NRC Resident Inspectors' Office - GGNS

Ms. B. Abeywickrama
Ms. T. Dozier
Mr. R. Foster
Mr. J. Hales
Ms. J. Jesse
Ms. A. Johnson

Entergy

Mr. T. A. Burke (ECH)
Mr. C. E. Brooks (ECH)
Mr. F. G. Burford (ECH)
Mr. G. H. Davant (ECH)
Mr. W. H. Hammett (M-ELEC)
Mr. P. D. Hinnenkamp (ECH)
Ms. D. Jacobs (ECH)
Ms. K. J. Lichtenberg (L-ENT)
Ms. D. Millar (ECH)
Ms. L. A. Patterson (ECH)
Mr. G. A. Rolfson (ECH)
Mr. J. Smith (ECH)
Mr. G. L. Sparks (ECH)
Ms. K. A. Washington (L-ENT)
Mr. T. L. Williamson (ECH)
Mr. M. D. Withrow (ECH)
Mr. G. A. Zinke (ECH)

Manager, Licensing (GGNS-1)
Site VP (GGNS-1)

Corporate File [29]

NuStart

Mr. G. Cesare
Mr. R. Grumbir
Mr. T. Hicks
Ms. M. Kray
NuStart Records (eB)

ENERCON

Mr. A. Schneider

Mr. T. Slavonic

Ms. R. Sullivan

Industry

Mr. R. Bell (NEI)

Ms. R. Borsh (Dominion)

Mr. L. F. Drbal (Black & Veatch)

Mr. S. P. Frantz (Morgan, Lewis & Bockius)

Mr. J. Hegner (Dominion)

Mr. B. R. Johnson (GE-Hitachi)

Mr. P. Smith (DTE)

ATTACHMENT 1

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-1

RAI QUESTION NO. 14.03.10-1

NRC RAI 14.03.10-1

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- A. Part 10, COL application, ITAAC Table 2.3-1, "ITAAC for Emergency Planning," does not include an ITAAC relating to the submission of detailed implementing procedures for the emergency plan no less than 180 days prior to fuel load. Such an ITAAC is identified under Planning Standard 17.0, "Implementing Procedures," in Table C.II.1-B1 of Regulatory Guide (RG) 1.206, issued June 20, 2007. Section II.P.7, "Implementing Procedures," of the Emergency Plan (Part 5) states that "Appendix 5 of this plan provides a topical listing of EPPs that support this plan." Appendix 5, "Emergency Plan Procedures—Topical List," provides a one-page list of various topics and activities that will be addressed in emergency plan implementing procedures and supporting procedures. Revise ITAAC Table 2.3-1 to include an ITAAC relating to the submission of detailed implementing procedures, consistent with RG 1.206 or justify an alternative approach.

Emergency Response

- A. Section V of Appendix E of 10 CFR Part 50 requires submittal of detailed implementing procedures for the emergency plan no later than 180 days prior to fuel loading. This requirement is documented in FSAR Chapter 13, Table 13.4-201, "Operational Programs Required by NRC Regulations," Item #14.

Proposed COLA Revision

None

ATTACHMENT 2

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-2

RAI QUESTION NO. 14.03.10-2

NRC RAI 14.03.10-2

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- B. Part 10, COL application in Table 2.3-1, "ITAAC For Emergency Planning," acceptance criterion 6.3 ends with the words "for various radiological conditions." Consistent with RG 1.206, and the corresponding EP program element in Table 2.3-1, the correct acceptance criterion wording should be "for various meteorological conditions." Please clarify.

Entergy Response

- B. The typographical error in Part 10, Table 2.3-1, Acceptance Criterion 6.3 will be reworded to read "for various meteorological conditions."

Proposed COLA Revision

COLA Part 10, Table 2.3-1, "ITAAC For Emergency Planning," Acceptance Criterion 6.3, will be revised as shown on the attached draft markup.

Markup of Grand Gulf COLA

The following markup represents Entergy's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

Table 2.3-1 ITAAC For Emergency Planning			
Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<p>B. Radiological Assessment and Control</p> <ol style="list-style-type: none"> 1. Onsite radiological surveys performed and samples collected. 2. Radiation exposure of emergency workers monitored and controlled. 3. Field monitoring teams assembled and deployed. 4. Field team data collected and disseminated. 5. Dose projections developed. 6. The decision whether to issue radioprotective drugs to GGNS emergency workers made. 7. Protective action recommendations developed and communicated to appropriate authorities.
	<p>6.2 The means exist to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. [I.3]</p> <p><u>ITAAC element addressed in:</u></p> <p>COL EP II.I.3, Appendix 2</p>	<p>6.2 An analysis of emergency plan implementing procedures will be performed.</p>	<p>6.2.1 A report exists that confirms a methodology has been established to determine source term of releases of radioactive materials within plant systems.</p>
	<p>6.3 The means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between</p>	<p>6.3 An analysis of emergency plan implementing procedures will be performed.</p>	<p>6.3 A report exists that confirms a methodology has been provided to establish the relationship between effluent monitor readings and onsite and offsite exposures and contamination for various radiological radiological <u>meteorological</u> conditions.</p>

ATTACHMENT 3

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-3

RAI QUESTION NO. 14.03.10-3

NRC RAI 14.03.10-3

ITAAC-1: ITAAC

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50
SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- C. Part 10, COL application in Table 2.3-1, "ITAAC For Emergency Planning," each acceptance criterion is prefaced with the phrase "A report exists that confirms . . ." The goal of ITAAC 'acceptance criteria' is to be objective criteria that can be demonstrated to have been 'met' prior to fuel load. The acceptance criteria must be specific and sufficiently objective, in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. In RIS 2008-05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal" (February 27, 2008), the following guidance is provided in regard to the use of such a phrase:

If applicants use the phrase, "a report exists and concludes that . . .," they should consider specifying the scope and the type of report. For example, they should explain whether the scope of the report includes the design, the as-built construction (as reconciled with the design), or any other information.

The use of the phrase "A report exists that confirms . . ." in the acceptance criteria is problematic, in that it is not clear how verification is actually conducted to confirm that the acceptance criteria are met. For example, acceptance criterion 5.1.1 states that "[a] report exists that confirms the TSC has at least 174 square meters (1875 square feet) of floor space." Is the confirmation – that the acceptance criteria has been met – through visual examination of the TSC area, or only through a review of an unidentified paper "report" that says the TSC is of the designated size; without considering the nature, accuracy, and reliability of the report?

Consistent with RIS 2008-05, please explain the type and scope of the "report" cited in ITAAC Table 2.3-1, including how the report will serve to provide accurate and reliable confirmation that the acceptance criteria have been met for the as-built facility. An area that might be appropriate for using a report to confirm that various ITAAC have been met is planning standard 8.0, "Exercises and Drills" – for which an Exercise Report could serve to verify that various exercise-related ITAAC (e.g., exercise objectives) have been met.

In the alternative, provide a revised ITAAC table without the words "A report exists that confirms" for the acceptance criteria. The removal of the reference to unidentified future reports will provide for objective ITAAC acceptance criteria, and leave open the specific method(s) that the licensee will use to confirm that the ITAAC acceptance criteria have been met.

Entergy Response

- C. Use of the phrase "A report exists that confirms..." refers to a report as defined in DCD/Tier 1 Rev. 5. The definition of report in DCD/Tier 1 Rev. 5 is: "**Report** means, as used in the Acceptance Criteria, a document created by or for the licensee that verifies that the acceptance criteria of the subject ITAAC have been met and references the supporting documentation. Reports typically include but are not limited to: results of walkdowns, results of visual inspections, field measurements, and reviews of design and construction documents."

Proposed COLA Revision

None

ATTACHMENT 4

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-4

RAI QUESTION NO. 14.03.10-4

NRC RAI 14.03.10-4

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)
SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.1 Table C.II.1-B1 (generic ITAAC) acceptance criterion 14.1.3 addresses offsite exercise objectives associated with the full participation exercise. Explain why Table 2.3-1 does not include an acceptance criterion to reflect the offsite exercise objectives associated with the full participation exercise, and how this is consistent with the intent of this generic ITAAC. Either provide the appropriate acceptance criterion, or explain why it is not required.

Entergy Response

D.1 Acceptance Criterion 8.1.1.2 in Table 2.3-1 specifically states that "exercise objectives, including specific acceptance criteria, addressed each of the following Emergency Planning (EP) Program Elements... ". This acceptance criterion is inclusive because it does not specify "onsite" or "offsite."

Entergy recognizes that a full participation exercise must be conducted prior to fuel loading and that offsite exercise objectives must be met or deficiencies addressed prior to operation above 5% power. The Federal Emergency Management Agency (FEMA) will evaluate offsite response during the full participation exercises and render their finding with respect to the adequacy of offsite response in support of Grand Gulf Unit 3 operations. FEMA's finding will be the determining factor for the NRC to authorize fuel loading and operation above 5% power. ¹

Proposed COLA Revision

None

¹ Reference 10 CFR 50.54(gg)

ATTACHMENT 5

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-5

RAI QUESTION NO. 14.03.10-5

NRC RAI 14.03.10-5

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)
SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.2 Table 2.3-1 acceptance criteria 8.1.2.1 and 8.1.2.2 appear to address Table C.II.1-B1 acceptance criterion 14.1.2. Explain why 8.1.2.2 does not include the word "successfully" in regard to emergency response personnel performing their assigned responsibilities.

Emergency Response

D.2. The term, "successfully," is a subjective term. Acceptance Criteria 8.1.2.1 and 8.1.2.2 provide objective criteria that can be met.

Proposed COLA Revision

None

ATTACHMENT 6

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-6

RAI QUESTION NO. 14.03.10-6

NRC RAI 14.03.10-6

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)

SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.3 Table C.II.1-B1 acceptance criterion 14.1.2 includes the bracketed statement that "[t]he COL applicant will identify responsibilities and associated acceptance criteria." Explain why Table 2.3-1 (acceptance criteria 8.1.2.1 and/or 8.1.2.2) does not identify any responsibilities and associated acceptance criteria, in relation to onsite emergency response personnel successfully performing their assigned responsibilities. Either provide the appropriate acceptance criterion, or explain why it is not required.

Entergy Response

D.3 The Grand Gulf Unit 3 Emergency Plan provides information regarding the onsite emergency response organization and associated responsibilities in Sections II.B.1 through II.B.7. A clarifying note will be added to Acceptance Criteria 8.1.2.1 and 8.1.2.2.

Proposed COLA Revision

COLA Part 10, Table 2.3-1, "ITAAC For Emergency Planning," Acceptance Criteria 8.1.2.1 and 8.1.2.2, will be revised as shown on the attached draft markup.

Markup of Grand Gulf COLA

The following markup represents Entergy's good faith effort to show how the COLA will be revised in a future COLA submittal in response to the subject RAI. However, the same COLA content may be impacted by revisions to the ESBWR DCD, responses to other COLA RAIs, other COLA changes, plant design changes, editorial or typographical corrections, etc. As a result, the final COLA content that appears in a future submittal may be somewhat different than as presented herein.

Table 2.3-1 ITAAC For Emergency Planning			
Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure EPZ appropriate to the locale have been developed.	<u>ITAAC element addressed in:</u> COL EP II.J.1		
8.0 Exercises and Drills			
10 CFR 50.47(b)(14) – Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.	8.1 Licensee conducts a full-participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ, and each State within the ingestion control EPZ. [N.1] <u>ITAAC element addressed in:</u> COL EP II.N.1	8.1 A full-participation exercise (test) will be conducted within the specified time periods of Appendix E to 10 CFR Part 50.	8.1.1.1 A report exists that confirms an exercise was conducted within the specified time periods of Appendix E to 10 CFR Part 50, onsite exercise objectives were met, and there were no uncorrected onsite exercise deficiencies. 8.1.1.2 A report exists that confirms exercise objectives, including specific acceptance criteria, addressed each of the following Emergency Planning (EP) Program Elements: <ul style="list-style-type: none"> • Emergency Classification • Notification and Emergency Communications • Emergency Public Information • Emergency Facilities and Equipment • Accident Assessment • Protective Response and Protective Action Recommendations • Radiological Exposure Control • Recovery and Re-Entry •

Table 2.3-1 ITAAC For Emergency Planning			
Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			8.1.2.1 A report exists that confirms onsite emergency response personnel were mobilized to fill emergency response positions. <u>(Note 1)</u> 8.1.2.2 A report exists that confirms onsite emergency response personnel performed their assigned responsibilities. <u>(Note 1)</u>

Note 1: Responsibilities are specified in COL EP II.B.1 through COL EP II.B.7.

ATTACHMENT 7

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-7

RAI QUESTION NO. 14.03.10-7

NRC RAI 14.03.10-7

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)
SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

D. Part 10, COL application Table 2.3-1, "ITAAC For Emergency Planning," provides four separate acceptance criteria for planning standard 8.0, "Exercises and Drills." Please address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory Guide (RG) 1.206, Appendix B, Table C.11.1-B1, "Emergency Planning Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)."

D.4 Table C.II.1-B1 acceptance criterion 14.1.1 includes the bracketed statement that "[t]he COL applicant will identify exercise objectives and associated acceptance criteria." Table 2.3-1 acceptance criterion 8.1.1.2 states that exercise objectives, including acceptance criteria, address each of the 8 listed emergency planning program elements. However, Table 2.3-1 does not identify (in the acceptance criteria) what the exercise objectives and associated acceptance criteria are (as called for in Table C.II.1-B1).

The goal of ITAAC acceptance criteria is to be objective criteria that can be demonstrated to have been 'met' prior to fuel load. The acceptance criteria must be specific and sufficiently objective, in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. As written, the acceptance criterion 8.1.1.2 does not provide such clear and objective criteria. For the full participation exercise acceptance criteria in Table 2.3-1, provide specific exercise objectives and associated acceptance criteria, consistent with Table C.II.1-B1. Either provide the appropriate acceptance criterion, or explain why it is not required.

Emergency Response

D.4 In order to ensure that future exercise objectives are sufficient for a comprehensive test of the Emergency Plan, Acceptance Criterion 8.1.1.2 includes a list of EP program elements that must be tested, including developing exercise objectives and specific acceptance criteria. Additionally, other acceptance criteria provide details directly related to specific objectives that must be met. Acceptance Criteria 2.1.1 and 2.2 address specific notification methods and procedures, Acceptance Criteria 3.1.1, 3.1.2, 3.1.3, 3.1.4, and 3.2 address specific emergency communication objectives, and Acceptance Criterion 6.1 speaks directly to accident assessment and classification and radiological assessment and control.

Details of exercise objectives are not provided in Acceptance Criterion 8.1.1.2 because exercise planning and conduct is a cooperative effort with the States of Mississippi and Louisiana and local jurisdictions.

Proposed COLA Revision

None

ATTACHMENT 8

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

RAI QUESTION NO. 14.03.10-8

RAI QUESTION NO. 14.03.10-8

NRC RAI 14.03.10-8

Regulatory Basis: 10 CFR 50.47(b)(8); 10 CFR 50.47(b)(14); 10 CFR 52.79(a)(21); 10 CFR 52.80; 10 CFR 52.80(a); Section IV.E of Appendix E to 10 CFR Part 50)
SRP ACCEPTANCE CRITERIA: Requirements A, B, and E; Acceptance Criteria 1, 2, 18, and 21

- E. COL application Table 2.3-1, "ITAAC for Emergency Planning," addresses the emergency classification system in ITAAC 1.1, but does not reflect the completion of a fully developed set of EALs that are consistent with Section IV.B of Appendix E to 10 CFR Part 50; including reflecting the current status of NEI 07-01. Revise ITAAC 1.1 to reflect the requirements for a standard emergency classification and action level scheme, with clear and objective acceptance criteria. An example of such an ITAAC, that would address the ongoing endorsement of NEI 07-01 by the NRC, is as follows:

Inspections, Tests, Analyses: An analysis of the EAL technical bases will be performed to verify as-built, site-specific implementation of the EAL scheme.

Acceptance Criteria: The EAL scheme is developed consistent with Regulatory Guide 1.101, *Emergency Planning and Preparedness for Nuclear Power Reactors*.

Entergy Response

- E. As indicated in Part 5 of the COL Application, Grand Gulf Unit 3 Emergency Plan, Section II.D.2, NEI 07-01, Rev 0, "Methodology for Development of Emergency Action Levels, Advanced Passive Light Water Reactors," was under NRC review at the time of COL application submittal. Entergy Operations, Inc. is cooperating with industry efforts supporting NRC endorsement of NEI 07-01. Once the NRC has endorsed NEI 07-01, Entergy will revise Part 10, ITAAC 1.1, as required.

Proposed COLA Revision

None

ATTACHMENT 9

G3NO-2008-00024

RESPONSE TO NRC RAI LETTER NO. 20

REGULATORY COMMITMENTS

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy 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	
Revise Part 10, ITAAC, Table 2.3-1, "ITAAC For Emergency Planning," Acceptance Criterion 6.3 to read, "A report exists that confirms a methodology has been provided to establish the relationship between effluent monitor readings and onsite and offsite exposures and contamination for various meteorological conditions".	✓		Future COLA submittal.
Revise Part 10, ITAAC Table 2.3-1, "ITAAC For Emergency Planning," Acceptance Criteria 8.1.2.1 and 8.1.2.2 to include the following clarifying note: Note 1: Responsibilities are specified in COL EP II.B.1 through COL EP II.B.7	✓		Future COLA submittal.
Once the NRC has endorsed NEI 07-01, Entergy will revise Part 10, ITAAC 1.1, as required.	✓		Future COLA submittal.