

PUBLIC SUBMISSION

JAN -6 PM 2: 21

As of: January 06, 2015
Received: January 02, 2015
Status: Pending Post
Tracking No. 1jz-8geh-zf38
Comments Due: January 02, 2015
Submission Type: Web

Docket: NRC-2014-0258

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Consideration of Approval of Transfer of License and Conforming Amendment; River Bend Station, Unit 1, and Waterford Steam Electric Station, Unit 3

Comment On: NRC-2014-0258-0001

River Bend Station, Unit 1, and Waterford Steam Electric Station, Unit 3; Consideration of Approval of Transfer of License and Conforming Amendment

Document: NRC-2014-0258-DRAFT-0001

Comment on FR Doc # 2014-28422

79 FR 71803
12/3/2014

Submitter Information

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General Comment

River Bend Station, Unit 1, and Waterford Steam Electric Station, Unit 3; Consideration of Approval of Transfer of License and Conforming Amendment

Docket ID: NRC-2014-0258 Agency: Nuclear Regulatory Commission (NRC)

You have inaccurately stated the name of the final licensee, as well as the holding company above it, for these two reactors in the Federal Register. As such, you need to reprint and extend the comment period. It is not serious that you cannot even bother to write out the names of the reactor licensees when it is so clearly written repeatedly in the Entergy application documents - even highlighted in red. The name of the Final Licensee is NOT Entergy Louisiana, LLC, as written in the Federal Register, but rather Entergy Louisiana Power, LLC: when the transactions are complete at the end of the day of closing, each owner licensee will have transferred its assets and liabilities to a new entity, Entergy Louisiana Power, LLC (ELP), that will hold as the owner the respective NRC licenses for RBS and Waterford. This new entity will be owned by a new intermediary holding company named Entergy Utility Holding Company, LLC. Thus, approval of the license transfers is required pursuant to 10 CFR 50.80..

Upon consummation of the proposed transaction, the former assets and liabilities of ELL and EGSL will be owned by a single operating company, ELP. From CNR0-20 14-00007, June 10, 2014, which is the cover letter to Application for Order Approving License Transfers and Conforming License Amendments, Entergy Operations, Inc. (All Dockets) River Bend Station Docket Nos. 50-458 & 72-49 Waterford 3 Steam Electric Station Docket Nos. 50-382 & 72-75

In contrast, according to the Federal Register regarding transfer of the two nuclear power stations: Following

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Add= A. Wang (ABW)

approval of the proposed direct and indirect transfers of control of the licenses, Entergy Louisiana, LLC would acquire ownership of Waterford and River Bend..

71804 Federal Register / Vol. 79, No. 232 / Wednesday, December 3, 2014 / Notices

THIS IS INCORRECT-FALSE ACCORDING TO ENTERGY'S APPLICATION!

Of even greater concern is the Federal Register-Alan Wang-NRCs conclusion that ELP becomes a subsidiary of LP&L: resulting in ELP becoming a subsidiary of LP&L. 71804 Federal Register / Vol. 79, No. 232 / Wednesday, December 3, 2014 / Notices While ELP does become a subsidiary of the OLD LP&L COMPANY, the OLD LP&L COMPANY changes its name to Entergy Utility Holding Company, LLC, which the Federal Register fails to state. AND, Entergy Energy Company appears nowhere except to take the name of the new entity named Louisiana Power & Light Company, LLC, according to the documents filed by Entergy: the membership interests of Louisiana Power & Light Company, LLC (LP&L LLC) and liabilities to a newly-formed subsidiary, Entergy Louisiana Power, LLC (ELP). (p. 1) EGSP LLC will merge with and into ELP, with ELP surviving the merger. Immediately after that merger, LP&L LLC will change its name to Entergy Utility Holding Company, LLC, and Entergy Energy Company LLC will change its name to Louisiana Power & Light Company, LLC. (p. 2) (Application for Order Approving License Transfers and Conforming License Amendments, Entergy Operations, Inc. (All Dockets) River Bend Station Docket Nos. 50-458 & 72-49 Waterford 3 Steam Electric Station Docket Nos. 50-382 & 72-75 That is the only place in the application that Entergy Energy Company, soon to be the NEW Louisiana Power & Light Company LLC appears. Thus we have no idea what this company does, but it seems to have nothing to do with these two reactors. Thus, to say that it does is misleading and a potential problem. No record of Entergy Energy Co. is found online. Is it somewhere in the 14 pages of Entergy subsidiaries found online?

Furthermore, if the NRC cannot even accurately state the licensee for the reactors, it is clear that they have not properly examined what the liability repercussions are of the switch from corporations lying between Entergy and the reactors vs. Limited Liability Companies lying between Entergy and the two reactors. How does the new 21% voting rights play in? The fact that LLCs do not keep minutes-records is a serious concern. As well, I must raise concerns of how having two reactors in a state following the rather unique Napoleonic Code (Louisiana), an entirely different legal system from the rest of the US, will work out with ownership in Texas when a nuclear accident occurs and for decommissioning and waste liability.

WATCH YOUR STEP!