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RBG-47879

July 12, 2018

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: Comments on Plant-Specific Supplement 58 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding River Bend Station, Unit 1, Draft Report for Comment

References: 1) Plant-Specific Supplement 58 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants Regarding River Bend Station, Unit 1, Draft Report for Comment (Dated May 2018)

Dear Sir or Madam:

Enclosure 1 contains comments Entergy Operations, Inc. (Entergy) is providing, to the "Plant-Specific Supplement 58 to the Generic Environmental Impact Statement (GEIS) for License Renewal of Nuclear Plants Regarding River Bend Station, Unit 1, Draft Report for Comment" to facilitate Staff's efforts in finalizing Supplement 58 to the GEIS.

There are no regulatory commitments in this submittal.

If you require additional information, please contact Mr. Tim Schenk at (225)-381-4177 or tschenk@entergy.com.

In accordance with 10 CFR 50.91(b)(1), Entergy is notifying the State of Louisiana and the State of Texas by transmitting a copy of this letter to the designated State Official.

Sincerely,

A handwritten signature in cursive script that reads "W. F. Maguire".

WFM/RMC/dp

Enclosure 1: Entergy Comments on Draft Supplement 58 of the GEIS

cc: (with Enclosure)

U. S. Nuclear Regulatory Commission
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cc: (w/o Enclosure)

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RBF1-18-0139

RBG-47879

Enclosure 1

Entergy Comments on Draft Supplement 58 of the GEIS

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
1	xix	8 - 9	NA	Insert space between lines 8 and 9 to separate paragraphs.
2	1-2	13	1.3	Based on the reference list in Section 6.0, NRC 2018b should be changed to "NRC 2018a."
3	1-7	17	1.10	Change Appendix F to "Appendix B" since Appendix F deals with SAMA and not Federal statutes.
4	2-6	1	2.2.2	Based on the reference list in Section 6.0, SERC 2015 should be changed to "SERC 2016."
5	2-8	NA	Table 2.1	For the new nuclear alternative, land requirements, change EOI 2008 to "Entergy 2008a" based on the reference list in Section 6.0. In addition, there is no EOI 2008 reference listed in Section 6.0.
6	2-8	NA	Table 2.1	For the SCPC alternative, land requirements, the "Entergy 2016d" reference is incorrect since it's associated with RBS's LPDES permit renewal application based on the reference list in Section 6.0.
7	2-8	NA	Table 2.1	For the combination alternative, work force, insert a 1,000 separator for "1,161."
8	2-9	11	2.2.2.1	The NRC 2017c reference is not correct as it is associated with a request to ACHP for scoping comments. Maybe the correct reference would be "NRC 2016d."
9	2-9	17	2.2.2.1	For consistency purposes with the wording on Page 2-10, Line 20 in Section 2.2.2.2, suggest changing "also be drained and removed" to only "be removed."
10	2-14	36	2.3.2	Change "become" to "became."
11	2-19	33	2.3.13	List of references in Section 6.0 only shows "EPA 2015" but not "EPA 2015a."
12	3-4	27	3.1.3.1	The "Entergy 2016f" is incorrect here since it is associated with the RBS SPCC Plan based on the list of references in Section 6.0. The appropriate reference should be "Entergy 2016d" as it is associated with the RBS LPDES permit renewal application.
13	3-5	27	3.1.3.2	Delete "and Blowdown Discharge" since this section does not address any blowdown discharges.
14	3-6	11	3.1.3.2	Need to change "(14-cm)" to "(91-cm)" since 36

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
				inches equates to 91.4-cm.
15	3-13	11	3.1.4.5	The "Entergy 2016h" reference is the 2015 RBS AREOR based on the list of references in Section 6.0. Suggest it be changed to Entergy "2017h" since Section 3.5.2.4 of the RBS ER addressed groundwater protection at the site.
16	3-13	3	3.1.5	Delete "or hazardous chemicals" since the reason that nonradioactive wastes are classified as "hazardous wastes" is because they contain a chemical(s) that are deemed hazardous.
17	3-13	36	3.1.4.5	Suggest "restoration" be changed to "remediation" since this is the term most commonly used within the industry.
18	3-14	19 - 20	3.1.5	Change "and devices containing mercury, electronics, and antifreeze" to "antifreeze, and devices containing mercury and electronics" since there are no devices at RBS that contain antifreeze.
19	3-15	33 - 34	3.1.6.4	Change "Woodville branch" to "the Kraft Paper Mill north of RBS and Power Station Road" as the rail line to Woodville has since been abandoned. See " http://www.abandonedrails.com/Woodville_Branch. "
20	3-15	36	3.1.6.4	As a suggestion, request that the wording "no plans" be changed to "no current plans" to allow some flexibility.
21	3-27	25 - 27	3.3.2	Delete "In accordance with the minor source air permit and LAC 33:III.501.C.6, Entergy submits semiannual and annual air emissions reports for RBS to the Louisiana Department of Environmental Quality" as the RBS air permit does not require the submittal of semiannual or annual reports to the LDEQ. This appears to be something that may have inadvertently got transferred over from the Waterford 3 SEIS that is currently being drafted.
22	3-29	19	3.3.3	Change "n" to "in."
23	3-34	2 & 7	3.4.3	There is no "USDA 2017" reference listed in the Section 6.0 references. Need to specify it is a, b, c, etc.
24	3-37	11	3.5.1.1	Just for clarification, suggest changing "RBS site" to "RBS industrial area" to avoid confusion saying there are no ponds and then saying there are ponds elsewhere on the property.

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
25	3-43	34	3.5.1.3	The correct reference for the permit should be "LDEQ 2017f" and not "LDEQ 2017a" since the current reference listed here pertains to LDEQ's 305(b) and 303(d) report.
26	3-43	36	3.5.1.3	Change "October 30, 2022" to "October 31, 2022."
27	3-43	39	3.5.1.3	Suggest deleting "including 7 internal outfalls (internal monitoring points)" since it could be misunderstood that RBS has 22 outfalls based on the current wording.
28	3-49	1-2	3.5.1.3	Change "the clarifier sludge blowdown pipeline (see Section 3.1.3.1)" to "Outfall 001 via a common discharge header" since sanitary effluent is not pumped to the clarifier sludge blowdown line, and since Section 3.1.3.1 does not address Outfall 001 (cooling tower blowdown), only clarifier sludge blowdown.
29	3-50	32	3.5.2.1	Change "fresh water" to "freshwater."
30	3-50	38	3.5.2.1	Insert parenthesis open "(" in front of USGS 2014b).
31	3-53	5	3.5.2.1	Change "fresh water" to "freshwater."
32	3-59	5	3.5.2.2	There are no "USGS 2004" or "USGS 2014" references listed in the Section 6.0 reference list.
33	3-63	1	3.5.2.4	Suggest inserting "potentially" prior to "reached" since the tritium was most likely non-detectable at the point of discharge into the Mississippi River due to dilution.
34	3-64	3	3.5.2.4	Change "monitor" to "monitoring."
35	3-65	2	3.5.2.4	Insert "an equivalent program to" after "participates in" since Entergy is no longer a member of NEI.
36	3-65	41	3.5.2.4	Delete "There, water was added to reduce the concentration in the tanks," since it was discovered that this was not part of the process as initial dilution occurs at the blowdown line.
37	3-65	43 - 44	3.5.2.4	Change "(Entergy 2017h)" "(LDEQ 2013)" to "(Entergy 2017h; LDEQ 2013)."
38	3-67	1	3.5.2.4	Change "remediating" to "mitigating" since that would be more appropriate for "natural attenuation."
39	3-69	25	3.6.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
40	3-69	31	3.6.3	Suggest deleting "to permanently" since this

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
				sentence doesn't flow correctly.
41	3-83	42	3.7.2.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
42	3-84	11, 13, 19, 28, 32 & 39	3.7.2.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
43	3-84	39	3.7.2.2	Suggest changing "Entergy 2017g" to "Entergy 2017h" since Entergy 2017h is the ER in the LRA and would be more specific.
44	3-85	4	3.7.2.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
45	3-87	NA	Table 3-11	Need to specify if the "GSUC 1984" references in the footnote is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
46	3-87	3	3.7.2.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
47	3-88	8	3.7.2.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
48	3-88	30 & 33	3.7.3.1	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
49	3-88	40	3.7.3.2	Need to specify if "GSUC 1984" is "GSUC 1984a" or "GSUC 1984b" based on the Section 6.0 references.
50	3-95	45	3.9.1	Need to add "Neuman and Hawkins 2013" to the Section 6.0 reference list as it is not currently shown.
51	3-96	7	3.9.1	Need to add "Neuman and Hawkins 2013" to the Section 6.0 reference list as it is not currently shown.
52	3-96	19	3.9.1	Need to add "Neuman and Hawkins 2013" to the Section 6.0 reference list as it is not currently shown.
53	3-96	36	3.9.1	Need to add "Neuman and Hawkins 2013" to the Section 6.0 reference list as it is not currently shown.
54	3-96	43 - 44	3.9.1	Need to add "Neuman and Hawkins 2013" to the Section 6.0 reference list as it is not currently shown.
55	3-97	35	3.9.2	Need to add "DOI 2013" to the Section 6.0 reference

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
				list as it is not currently shown.
56	3-105	NA	Table 3-20	For footnote (b), it's confusing on what "Table 7" is referencing.
57	3-112	19	3.11.3	Change "CDC 2004a" to "CDC 2004" to reflect how it's shown in the Section 6.0 reference list.
58	4-4	NA	Table 4-1	For footnote (a), need to move "contained in NUREG-2157 (NRC 2014)" to the previous line. Also, need to change "NRC 2014" to "NRC 2014a" to match the list the references in Section 6.0.
59	4-7	8 - 9	4.2.3	Suggest removing "Because of their height, the cooling towers may require aircraft warning lights, which would be visible at night" since the alternative would utilize RBS's existing mechanical draft cooling towers which do not have aircraft warning lights.
60	4-19	19	4.5.1.2	Change "restoration" to "remediation" since this is the term most commonly used within the industry.
61	4-25	28	4.6.1.1	Change "SWPP" to "SWPPP" since that would be the correct acronym for stormwater pollution prevention plan used by regulatory agencies, and would be consistent with what was used in previous SEIS discussions.
62	4-32	NA	Table 4-3	Suggest removing "(a)' from Federal Status" heading as there is no footnote (a) to this table.
63	4-37	37	4.8.1.1	Need to change "proposed license renewal" to "renewal of the LPDES permit" since FWS's review was associated with the LPDES permit, not license renewal.
64	4-42	3 - 9	4.9.1.3	Need to remove as RBS does not have a separate cultural resources plan. These sentences are referring to WF3's separate cultural resources protection plan that is required by their Environmental Protection Plan. You can move the last sentence in this paragraph into the preceding paragraph.
65	4-48	NA	Table 4-4	Just as an observation, (1) new nuclear does not address transportation; (2) SCPC and natural gas only address transportation; and (3) the combination alternative only addresses DSM but not the other two components. Is there a reason it was done this way?

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Item	Page	Line	Section	Comment
66	4-50	31	4.11.1.2	The "NIEHS 1999" cited here is not listed in the Section 6.0 references.
67	4-59	36	4.12	Change "section" to "Section" (upper case).
68	4-52 & 4-56	39 & 13	4.11.1.4	NUREG-1530, Rev. 1 (Reference NRC 2015b) is cited in the text of Section 4.11.1.4, but is not listed as a reference in Section 6. (This reference is listed in Appendix F, Section F.8.)
69	4-53 & 4-57	6-8 & 3-4	4.11.1.4	<p>"Entergy did, however, enter the 10 potentially cost beneficial SAMAs into the action tracking process to further evaluate their implementation (Entergy 2017h, Entergy 2017g)..."</p> <p>Suggest adding a reference since the listed references discuss only 8 of the 10 potentially cost-beneficial SAMAs. Reference (Entergy 2017b) in Section F.8 discusses the 2 potentially cost-beneficial SAMAs identified in RAI responses.</p>
70	4-53 & 4-54	24 & Table 4-5 Total CDF (Internal Events)	4.11.1.4	<p>"The RBS core damage frequency (CDF) for internal events is approximately 2.8×10^{-5} per year."</p> <p>Table 4-5 Total CDF (Internal Events) = 2.8×10^{-5}</p> <p>These CDF values should be 2.8×10^{-6}. As stated in Entergy 2017h, Appendix D, Section D.1.1, "The RBS internal events baseline at power CDF is $2.79E-06$/Reactor-year."</p>
71	4-56	15-19	4.11.1.4	<p>"NEI 05-01A states that two sets of estimates should be developed—one using a 3 percent discount rate and one using a 7 percent discount rate (NEI 2005). Entergy provided a base set of results using a discount rate of 7 percent and a 29-year license renewal period and based its decisions regarding potentially cost-beneficial SAMAs on these values."</p> <p>This implies that Entergy did not develop estimates using a 3 percent discount rate. However, as discussed in Entergy 2017h (Section 4.15.1.3), Entergy performed a sensitivity analysis using a discount rate of 3 percent.</p> <p>In addition, Section 4.15.1.4 of Entergy 2017h shows that Entergy based its decisions regarding potentially cost-beneficial SAMAs on both the baseline and two sensitivity case results.</p>
72	4-56	44	4.11.1.4	Typo -- "alternative current" should be "alternating current."

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
73	4-76	12	4.16.1	Change "ISFI" to "ISFSI."
74	4-80	36	4.16.2.2	The "USGS 2004" reference is not listed in the Section 6.0 references.
75	4-88	44	4.16.7	Change "2017" to "2016" since the discussion is focusing on a 5-year period. In other words, 2012 – 2016 would represent a 5-year period.
76	4-91	NA	Table 4-10	The "GCP 2017" reference cited in the footnote to this table is not listed in the Section 6.0 references.
77	6-3	12	6.0	Delete "Bald and Golden Eagle Protection Act. 16 U.S.C. § 668 et seq" as it has no relation to the "Blevins" reference and content.
78	8-3	NA	Table 8-1	Just for your records, "Bruce Fielding" with the LDEQ Water Permits Division is no longer with the LDEQ and has been replaced by "Christa Clark."
79	B-1	20	Appendix B	The "LDEQ Undated" cited here is not listed in the Section 6.0 references.
80	B-4	NA	Table B-1	Shouldn't "LAC 33:Part V and LAC 33 Part:VII" state what they regulate for consistency on how the other laws and regulations are shown?
81	B-5	NA	Table B-2	Change the expiration date for the LPDES permit expiration date to "November 1, 2022" with no associated footnote since RBS received a renewed permit in September 2017. The renewed permit can be retrieved from EDMS on LDEQ's website.
82	B-6	NA	Table B-2	Change the footnote designation associated with the air permit to "(a)."
83	B-7	NA	Table B-2	Delete "footnote (a) since RBS has received a renewed LPDES permit and change "footnote (b)" to "footnote (b)."
84	B-7	NA	Table B-2	The "Source: Entergy 2017a" is incorrect as this reference is associated with the RBS 2016 ARERR. The correct reference should be "Entergy 2017h."
85	B-7	18 - 20	B-3	Delete the "Entergy 2017a" reference as this reference is associated with the RBS 2016 ARERR, and replace with "Entergy 2017h," since this is the RBS license renewal ER.
86	C-1	42 - 43	C.1.2	Need a space between lines 42 and 43 since they are separate paragraphs.

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
87	C-2	20 - 21	C.1.3	Need a space between lines 20 and 21 since they are separate paragraphs.
88	C-2	27 – 28	C.1.3	Need a space between lines 27 and 28 since they are separate paragraphs.
89	C-3	9 - 10	C.2	Need a space between lines 9 and 10 since they are separate paragraphs.
90	C-3	27	C.3	Change “RPS” to “RBS.”
91	E-1	NA	Table E-1	For the Hood Container of Louisiana, the “EIA 2017j” reference was not listed in the Section E.1 reference list. Also, need to add parenthesis close after “EPA 2017b.”
92	E-2	NA	Table E-1	For Georgia Pacific, the “EIA 2017g” reference was not listed in the Section E.1 reference list.
93	E-2	NA	Table E-1	Change ExxonMobil” to “Exxon Mobil” under the Manufacturing Facilities column. In addition, the “EIA 2017h” reference used for this facility was not listed in the Section E.1 reference list.
94	E-2	NA	Table E-1	Change ExxonMobil” to “Exxon Mobil” under the Project Name column. In addition, the “EIA 2017i” reference used for this facility was not listed in the Section E.1 reference list.
95	E-3	NA	Table E-1	For Oxbow Carbon under the location column, change “13mi” to “13 mi.”
96	E-3	NA	Table E-1	For Formosa Plastic, the “EIA 2017K” reference used for this facility was not listed in the Section E.1 reference list.
97	E-3	NA	Table E-1	Placid Refining LLC, the “EIA 2017l” reference used for this facility was not listed in the Section E.1 reference list.
98	E-5	NA	Table E-1	In the status column for Rosedown Plantation and Homochitto National Forest, insert a “closed parenthesis” after the cited references.
99	E-5	NA	Table E-1	For the Port Hudson National Cemetery, there is no “NPS Undated” listed in the Section E.1 reference list. I believe the cited reference should be “NOS 2017” based on the Section E.1 reference list.
100	E-6	NA	Table E-1	For the Mary Ann Brown Nature Preserve, there is no “ABA 2013” reference listed in the Section E.1 reference list.

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
101	E-7	NA	Table E-1	For the St. Francisville Army Corps of Engineers Mat Yard, change "(USACOE 2017)" to "(USACE 2017)" to show how it's listed in the Section E.1 reference list. Basically removing the "O."
102	E-8	10 – 12	E.1	There is no "EIA 2017f" reference cited in Appendix E.
103	E-10	25	E.1	Insert "(WM)" in front of "Waste Management."
104	F-1 & F-54	27 & 25	F.1 & F.8	The NRC email containing SAMA RAIs (ML17317A002) is dated November 8, 2017 (as shown in ADAMS and DSEIS Table D-1).
105	F-8	NA	Table F-3	Consider adding a clarifying footnote to Table F.3 that the 1.1×10^{-6} /yr CDF reported for Revision 6 does not include the Internal Flood contribution.
106	F-9	27	F.2.2.1	Clarification -- July 2011 is the date of the final RBS Peer Review report; the actual peer review occurred in April 2011. Suggest changing "July 2011" to "2011."
107	F-14	16	F.2.2.2	Clarification -- July 2011 is the date of the final RBS Peer Review report; the actual peer review occurred in April 2011. Suggest changing "July 2011" to "2011."
108	F-9	39	F.2.2.1	Consider clarifying this line by noting it refers to PRA Revision 5A; suggested phrasing: "ER Table D.1-13 lists the 18 peer review findings that remain open as of PRA Revision 5A, with their disposition...."
109	F-11	30-31	F.2.2.2	The Entergy seismic model was not developed for the purposes of incorporating the impact of a SAMA on seismic risk. Suggest rephrasing this sentence as: "Entergy previously developed a seismic CDF...."
110	F-16	12	F.2.2.2	It appears that Reference (NRC 2017) should be (NRC 2017a).
111	F-19	38	F.2.2.3	Reference (NRC 1990) is cited for NUREG/CR-4551. However, reference (NRC 1990) in Section F.8 is NUREG-1150. The reference for the probabilities of successful or unsuccessful debris cooling should be: NUREG/CR-4551, Volume 6, Rev. 1, "Evaluation of Severe Accident Risks: Grand Gulf, Unit 1," U. S. Nuclear

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
				Regulatory Commission, December 1990. ML063540025
112	F-21	41	F.2.2.4	It appears that Reference (Entergy 2016) should be (Entergy 2017a).
113	F-23	17-18	F.2.2.4	<p>“The Entergy assessment used U.S. Census 2000 and 2010 data and scaled...”</p> <p>The most recent (2010) census data was used as the starting point for the population projections to 2045. Year 2000 census data was not used.</p>
114	F-23	48	F.2.2.4	<p>“...for STCs 7 through 10 the alarm occurs prior to the initial alarm...”</p> <p>At the end of this phrase, “initial alarm” should be “initial plume.”</p>
115	F-26	Footnote	F.3.2	<p>Since the ER contains a list, but does not contain a statement that 13 BWR SAMAs were reviewed, suggest changing the beginning of the footnote to the following.</p> <p>“In response to an NRC staff RAI, Entergy indicated that the SAMA analysis for one of the 13 BWR plants listed in the ER had not been reviewed. Entergy concluded ...”</p>
116	F-28	2	F.3.2	The phrase “or adding an additional standby pump” was not included in the RAI (5.b.i) provided in reference NRC 2017a.
117	F-35 - F-43	Various	Table F-6	<p>Table F-6 has the following formatting issues.</p> <ul style="list-style-type: none"> a) Potentially cost-beneficial SAMAs should be in bold text, as stated in the body of the text. b) Some headers are appearing mid-page. (e.g., second page of Table) c) OECR Title is not above column. d) Some dollar values are scrolling to the next line. (e.g., cases 14 and 15, where dollar values do not fit on one line and scroll to the next)
118	F-35	Case 3	Table F-6	As shown in ER Table D.2-1, Analysis Case 3 is for SAMA 15, not SAMA 3. (The description of the SAMA is correct.)

ENTERGY COMMENTS ON DRAFT SUPPLEMENT 58 OF THE GEIS				
Item	Page	Line	Section	Comment
119	F-35 - F-43	Various	Table F-6	Table F-6 has the following formatting issues. <ul style="list-style-type: none">e) Potentially cost-beneficial SAMAs should be in bold text, as stated in the body of the text.f) Some headers are appearing mid-page. (e.g., second page of Table)g) OECR Title is not above column.h) Some dollar values are scrolling to the next line. (e.g., cases 14 and 15, where dollar values do not fit on one line and scroll to the next)
120	F-43	NA	Table F-6	A new SAMA was evaluated in response to NRC staff RAI 5.b.vi (Entergy 2017b) as discussed on page F-50. Should this SAMA be included in Table F-6?