



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 22, 2018

Mr. William F. Maguire
Site Vice President
Entergy Operations, Inc.
River Bend Station, Unit 1
5485 U.S. Highway 61
St. Francisville, LA 70775

SUBJECT: RESPONSE TO COMMENTS ON THE DRAFT PLANT-SPECIFIC
SUPPLEMENT 58 TO THE GENERIC ENVIRONMENTAL IMPACT
STATEMENT FOR LICENSE RENEWAL OF NUCLEAR PLANTS
REGARDING RIVER BEND STATION, UNIT 1
(EPID NO. L-2017-LNE-0027)

Dear Mr. Maguire:

This letter is in response to the Entergy Operations, Inc., letter dated July 12, 2018 (Agencywide Documents Access and Management Systems (ADAMS) Accession No. ML18193B141), that provided comments on draft plant-specific Supplement 58 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants (GEIS)," regarding the renewal of operating license NPF-47 for an additional 20 years of operation for River Bend Station, Unit 1 (RBS). Our responses to your comments are provided in the enclosure to this letter.

The final Supplement 58 is planned to be published in November 2018.

If you have any questions regarding this matter, please contact Mr. David Drucker, Project Manager, for the environmental review of the RBS license renewal application, by telephone at 301-415-6223 or by e-mail at david.drucker@nrc.gov.

Sincerely,

/RA/

Eric R. Oesterle, Chief
License Renewal Projects Branch
Division of Materials and License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-458

Enclosure:
As stated

cc w/encl: Listserv

SUBJECT: RESPONSE TO COMMENTS ON THE DRAFT PLANT-SPECIFIC SUPPLEMENT 58 TO THE GENERIC ENVIRONMENTAL IMPACT STATEMENT FOR LICENSE RENEWAL OF NUCLEAR PLANTS REGARDING RIVER BEND STATION, UNIT 1 (EPID L-2017-LNE-0027)

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Entergy Comments on RBS Draft SEIS and NRC responses

Item	Page	Line	Section	Comment
1	xix	8 - 9	NA	<p>Insert space between lines 8 and 9 to separate paragraphs.</p> <p>RESPONSE: <i>Incorporated into the Supplemental Environmental Impact Statement (SEIS).</i></p>
2	1-2	13	1.3	<p>Based on the reference list in Section 6.0, NRC 2018b should be changed to “NRC 2018a.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
3	1-7	17	1.10	<p>Change Appendix F to “Appendix B” since Appendix F deals with SAMA and not Federal statutes.</p> <p>RESPONSE: <i>No change - the sentence refers to Appendix F of the Generic Environmental Impact Statement (GEIS).</i></p>
4	2-6	1	2.2.2	<p>Based on the reference list in Section 6.0, SERC 2015 should be changed to “SERC 2016.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
5	2-8	NA	Table 2.1	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
6	2-8	NA	Table 2.1	<p>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.</p> <p>RESPONSE: <i>Reference corrected to Entergy 2016a.</i></p>
7	2-8	NA	Table 2.1	<p>For the combination alternative, work force, insert a 1,000 separator for “1,161.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
8	2-9	11	2.2.2.1	<p>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.”</p> <p>RESPONSE: <i>Reference corrected to NRC 2017m.</i></p>

Entergy Comments on RBS Draft SEIS and NRC responses

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.” RESPONSE: <i>Incorporated into SEIS.</i>
10	2-14	36	2.3.2	Change “become” to “became.” RESPONSE: <i>Incorporated into SEIS.</i>
11	2-19	33	2.3.13	List of references in Section 6.0 only shows “EPA 2015” but not “EPA 2015a.” RESPONSE: <i>No change - The DSEIS at page 2-19, line 33 shows EPA 2015 so no change here – Entergy reviewer may have confused EIA 2015a with EPA 2015a because they are right next to each other on line 33.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
13	3-6	27	3.1.3.2	Delete “and Blowdown Discharge” since this section does not address any blowdown discharges. RESPONSE: <i>Incorporated into SEIS.</i>
14	3-6	11	3.1.3.2	Need to change “(14-cm)” to “(91-cm)” since 36 inches equates to 91.4-cm. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Edit not accepted. Instead changed the subject sentence to:</i> <i>“Nuclear power plants generate some wastes that are not contaminated with radionuclides, and may or may not contain hazardous chemicals.”</i>

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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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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 . RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
22	3-29	19	3.3.3	Change “n” to “in.” RESPONSE: <i>Proposed change not accepted. The “n” is referring to an unspecified percentage value and the sentence following this statement provides an example. However, for clarity quotes have been added.</i>
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. RESPONSE: <i>No change - there is a USDA 2017 in the references in Section 6.</i>

Entergy Comments on RBS Draft SEIS and NRC responses

24	3-37	11	3.5.1.1	<p>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.</p> <p>RESPONSE: <i>Changed “RBS site” to “RBS plant complex” for consistency with usage elsewhere.</i></p>
25	3-43	34	3.5.1.3	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
26	3-43	36	3.5.1.3	<p>Change “October 30, 2022” to “October 31, 2022.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
27	3-43	39	3.5.1.3	<p>Suggest deleting “including 7 internal outfalls (internal monitoring points)” since it could be misunderstood that RBS has 22 outfalls based on the current wording.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
28	3-49	1-2	3.5.1.3	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
29	3-50	32	3.5.2.1	<p>Change “fresh water” to “freshwater.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
30	3-50	38	3.5.2.1	<p>Insert parenthesis open (“ in front of USGS 2014b).</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
31	3-53	5	3.5.2.1	<p>Change “fresh water” to “freshwater.”</p> <p>RESPONSE: <i>No change – only use freshwater when used as an adjective.</i></p>
32	3-59	5	3.5.2.2	<p>There are no “USGS 2004” or “USGS 2014” references listed in the Section 6.0 reference list.</p> <p>RESPONSE: <i>A reference was added for “USGS 2004” and the citation “USGS 2014” on page 3-59 was changed to “USGS 2014b”.</i></p>

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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. RESPONSE: <i>Incorporated into SEIS.</i>
34	3-64	3	3.5.2.4	Change “monitor” to “monitoring.” RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
37	3-65	43 - 44	3.5.2.4	Change “(Entergy 2017h)” “(LDEQ 2013)” to “(Entergy 2017h; LDEQ 2013).” RESPONSE: <i>Incorporated into SEIS.</i>
38	3-67	1	3.5.2.4	Change “remediating” to “mitigating” since that would be more appropriate for “natural attenuation.” RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
40	3-69	31	3.6.3	Suggest deleting “to permanently” since this sentence doesn’t flow correctly. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>

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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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Changed “GSUC 1984” to “GSUC 1984a”.</i>
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. RESPONSE: <i>Reference added and corrected to “Neuman and Hawkins 1993”.</i>
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. RESPONSE: <i>Reference added and corrected to “Neuman and Hawkins 1993”.</i>
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. RESPONSE: <i>Reference added and corrected to “Neuman and Hawkins 1993”.</i>

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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. RESPONSE: <i>Reference added and corrected to “Neuman and Hawkins 1993”.</i>
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. RESPONSE: <i>Reference added and corrected to “Neuman and Hawkins 1993”.</i>
55	3-97	35	3.9.2	Need to add “DOI 2013” to the Section 6.0 reference list as it is not currently shown. RESPONSE: <i>Reference added and corrected to “DOI 2017”.</i>
56	3-105	NA	Table 3-20	For footnote (b), it’s confusing on what “Table 7” is referencing. RESPONSE: <i>Table 7 is in the 2012 Census of Agriculture (NASS 2014).</i>
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. RESPONSE: <i>No change - Entergy misread the reference. The reference on page 3-112 line 119 is CDC 2014a (not CDC 2004a as noted in the comment). The stated reference is correct.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
60	4-19	19	4.5.1.2	Change “restoration” to “remediation” since this is the term most commonly used within the industry. RESPONSE: <i>Incorporated into SEIS.</i>

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61	4-25	28	4.6.1.1	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
62	4-32	NA	Table 4-3	<p>Suggest removing “(a)’ from Federal Status” heading as there is no footnote (a) to this table.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
63	4-37	37	4.8.1.1	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
64	4-42	3 - 9	4.9.1.3	<p>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.</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
65	4-48	NA	Table 4-4	<p>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?</p> <p>RESPONSE: <i>Only distinguishing information representing the differences between the alternatives was provided in the discussion. All repetitive information was excluded.</i></p>
66	4-50	31	4.11.1.2	<p>The “NIEHS 1999” cited here is not listed in the Section 6.0 references.</p> <p>RESPONSE: <i>“NIEHS 1999” added to Section 6.0.</i></p>
67	4-59	36	4.12	<p>Change “section” to “Section” (upper case).</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
68	4-52 & 4-56	39 &13	4.11.1.4	<p>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.)</p> <p>RESPONSE: <i>“NRC 2015b” added to Section 6.0.</i></p>

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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> <p>RESPONSE: <i>Incorporated into SEIS.</i></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> <p>RESPONSE: <i>Incorporated into SEIS.</i></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> <p>RESPONSE: <i>The sentence of concern above was modified as follows: “Entergy provided a base set of results for a 29-year license renewal period with a 3 percent and 7 percent discount rate sensitivity and based its decisions regarding potentially cost-beneficial SAMAs on these values.”</i></p>
72	4-56	44	4.11.1.4	<p>Typo -- “alternative current” should be “alternating current.”</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>

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73	4-76	12	4.16.1	Change "ISFI" to "ISFSI." RESPONSE: <i>Incorporated into SEIS.</i>
74	4-80	36	4.16.2.2	The "USGS 2004" reference is not listed in the Section 6.0 references. RESPONSE: <i>"USGS 2004" added to Section 6.0.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>"GCP 2017" added to Section 6.0.</i>
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. RESPONSE: <i>In the Draft SEIS the "Bald and Golden Eagle Act" reference and the "Blevins 2011" reference were inadvertently merged. A line was added between them in the Final SEIS.</i>
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." RESPONSE: <i>Incorporated into SEIS.</i>
79	B-1	20	Appendix B	The "LDEQ Undated" cited here is not listed in the Section 6.0 references. RESPONSE: <i>References for each appendix are placed at the end of each appendix and not in Section 6.0. The reference for "LDEQ Undated" was added to the end of Appendix B.</i>
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? RESPONSE: <i>No change - Titles of LAC Part V and Part VII are self-explanatory.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>

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82	B-6	NA	Table B-2	Change the footnote designation associated with the air permit to “(a).” RESPONSE: <i>Incorporated into SEIS.</i>
83	B-7	NA	Table B-2	Delete “footnote (a) since RBS has received a renewed LPDES permit and change “footnote (b)” to “footnote (a).” RESPONSE: <i>Incorporated into SEIS.</i>
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.” RESPONSE: <i>No change – references for each appendix appear at the end of the appendix and are not related to the references in Section 6.0.</i>
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. RESPONSE: <i>No change – references for each appendix appear at the end of the appendix and are not related to the references in Section 6.0.</i>
86	C-1	42 - 43	C.1.2	Need a space between lines 42 and 43 since they are separate paragraphs. RESPONSE: <i>Incorporated into SEIS.</i>
87	C-2	20 - 21	C.1.3	Need a space between lines 20 and 21 since they are separate paragraphs. RESPONSE: <i>Incorporated into SEIS.</i>
88	C-2	27 – 28	C.1.3	Need a space between lines 27 and 28 since they are separate paragraphs. RESPONSE: <i>Incorporated into SEIS.</i>
89	C-3	9 - 10	C.2	Need a space between lines 9 and 10 since they are separate paragraphs. RESPONSE: <i>Incorporated into SEIS.</i>
90	C-3	27	C.3	Change “RPS” to “RBS.” RESPONSE: <i>Incorporated into SEIS.</i>
91	E-2	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.” RESPONSE: <i>“EIA 2017j” added to references in Appendix E and parenthesis added.</i>

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92	E-2	NA	Table E-1	For Georgia Pacific, the “EIA 2017g” reference was not listed in the Section E.1 reference list. RESPONSE: <i>“EIA 2017g” added to reference list and parenthesis added.</i>
93	E-2	NA	Table E-1	Change ExxonMobil” to “Exxon Mobil” under the Manufacturing Facilities column. RESPONSE: <i>No change – reference material does not have space between Exxon and Mobil.</i> In addition, the “EIA 2017h” reference used for this facility was not listed in the Section E.1 reference list. RESPONSE: <i>“EIA 2017h” added to reference list.</i>
94	E-2	NA	Table E-1	Change ExxonMobil” to “Exxon Mobil” under the Project Name column. RESPONSE: <i>No change – reference material does not have space between Exxon and Mobil.</i> In addition, the “EIA 2017i” reference used for this facility was not listed in the Section E.1 reference list. RESPONSE: <i>“EIA 2017i” added to reference list.</i>
95	E-3	NA	Table E-1	For Oxbow Carbon under the location column, change “13mi” to “13 mi.” RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>“EIA 2017k” added to reference list.</i>
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. RESPONSE: <i>“EIA 2017l” added to reference list.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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 “NPS 2017” based on the Section E.1 reference list. RESPONSE: <i>Incorporated into SEIS.</i>

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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. RESPONSE: <i>Replaced “ABA 2013” with “TNC 2018”, and added “TNC 2018” to the reference list.</i>
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.” RESPONSE: <i>Incorporated into SEIS.</i>
102	E-8	10 – 12	E.1	There is no “EIA 2017f” reference cited in Appendix E. RESPONSE: <i>“EIA 2017f” added to reference list.</i>
103	E-10	25	E.1	Insert “(WM)” in front of “Waste Management.” RESPONSE: <i>Incorporated into SEIS.</i>
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). RESPONSE: <i>Incorporated into SEIS.</i>
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. RESPONSE: <i>Incorporated into SEIS.</i>
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.” RESPONSE: <i>Incorporated into SEIS.</i>
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.” RESPONSE: <i>Incorporated into SEIS.</i>

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108	F-9	39	F.2.2.1	<p>Consider clarifying this line by noting it refers to PRA Revision 5A; suggested phrasing:</p> <p>"ER Table D.1-13 lists the 18 peer review findings that remain open as of PRA Revision 5A, with their disposition...."</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
109	F-11	30-31	F.2.2.2	<p>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..."</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
110	F-16	12	F.2.2.2	<p>It appears that Reference (NRC 2017) should be (NRC 2017a).</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
111	F-19	38	F.2.2.3	<p>Reference (NRC 1990) is cited for NUREG/CR-4551. However, reference (NRC 1990) in Section F.8 is NUREG-1150.</p> <p>RESPONSE: <i>Changed "NRC 1990" in the reference list to refer to NUREG/CR-4551.</i></p>
112	F-21	41	F.2.2.4	<p>It appears that Reference (Entergy 2016) should be (Entergy 2017a).</p> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
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> <p>RESPONSE: <i>Incorporated into SEIS.</i></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> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>

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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> <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
116	F-28	2	F.3.2	<p>The phrase “or adding an additional standby pump” was not included in the RAI (5.b.i) provided in reference NRC 2017a.</p> <p>RESPONSE: <i>The phrase “or adding an additional standby pump” was deleted.</i></p>
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 don’t fit on one line and scroll to next) <p>RESPONSE: <i>Incorporated into SEIS.</i></p>
118	F-35	Case 3	Table F-6	<p>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.)</p> <p>RESPONSE: <i>Changed SAMA 3 to SAMA 15.</i></p>
119	F-35 - F-43	Various	Table F-6	<p>Table F-6 has the following formatting issues.</p> <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 don’t fit on one line and scroll to next) <p>RESPONSE: <i>This is a duplicate of #117 above.</i></p>
120	F-43	NA	Table F-6	<p>A new SAMA was evaluated in response to RAI 5.b.vi (Entergy 2017b) as discussed on p. F-50. Should this SAMA be included in Table F-6?</p> <p>RESPONSE: This SAMA was added to Table F-6.</p>