

CNRO2025-00025

10 CFR 170.11
10 CFR 52.7

August 14, 2025

ATTN: Document Control Desk
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Letter-of-Intent to Submit a Request for Renewal of ESP-002 and Request
for NRC Fee Waiver

Grand Gulf ESP Site
Early Site Permit No. ESP-002
NRC Docket Nos. 52-009

The purpose of this letter is to inform the U.S. Nuclear Regulatory Commission (NRC) that Entergy Operations Inc. (Entergy), on behalf of System Energy Resources, Inc. (SERI), intends to submit a request for exemption from 10 CFR 52.29(a) and renewal of ESP-002 for the Grand Gulf Nuclear Station (GGNS) Early Site Permit (ESP) site.

In Reference 1, the NRC issued ESP-002 to SERI, a subsidiary of the Entergy Corporation, for additional nuclear power plants at a site located approximately 25 miles south of the city of Vicksburg, Mississippi and adjacent to the existing Grand Gulf Nuclear Station. The ESP became effective on April 5, 2007, and expires on April 5, 2027.

In Reference 2, Nuclear Energy Institute (NEI) submitted NEI 25-06, "Guidance for Implementing the Requirements of 10 CFR Part 52 for Early Site Permit Renewals," for NRC review and endorsement. Appendix A of NEI 25-06 describes a streamlined approach to ESP renewal in which an exemption from the requirement in 10 CFR 52.29(a) to bring all of the information and data from the previous application up to date is requested and the ESP is renewed for a specified period without update. In Reference 3, the NRC acknowledged receipt of NEI's letter and agreed with the high-level concepts outlined within it. In Reference 3, the NRC also agreed that an industry pilot of the Appendix A approach would be an effective next step for timely engagement on this topic.

Entergy requests that the NRC review fees associated with the NRC evaluation of ESP-002 renewal application and associated exemption request be waived in accordance with 10 CFR 170.11(b), on the basis that the fee waiver is authorized by law and is otherwise in the public interest.

Entergy anticipates being the first licensee to request a review and approval of an ESP renewal (i.e., as a "lead" or "pilot" plant) under the proposed NEI 25-06 Appendix A approach. This approach is expected to eliminate the unnecessary expenditure of millions of dollars and thousands of hours for studies and reviews at a time when such efforts are not required to protect public health and safety. Further, exemption from the requirements of 10 CFR 52.29(a) may facilitate increased deployment of new advanced reactor technologies by deferring significant costs until there is greater project certainty. Therefore, Entergy believes that the planned submittal satisfies the standard for an NRC review fee waiver described in 10 CFR 170.11(b) on the basis that the review of the request will assist the NRC in implementing generic regulatory improvements or efforts. This request is consistent with the precedent noted in References 4, 5, and 6.

Entergy respectfully requests a decision on the request for NRC fee waiver as soon as practicable to support timely and efficient scheduling of ESP renewal activities.

There are no regulatory commitments contained in this letter.

Should you have any questions or require additional information, please contact me at 601-368-5102.

Respectfully,

Phil Couture

PC/gn

- References:
1. NRC letter to SERI, "Issuance of Early Site Permit (ESP) for System Energy Resources, Inc. – Grand Gulf ESP Site (ESP-002)," (ML070780457) dated April 5, 2007
 2. NEI letter to NRC, "NEI Guidance for Implementing the Requirements of 10 CFR Part 52 for Early Site Permit Renewal," (ML25171A132) dated June 9, 2025
 3. NRC letter to NEI, "U.S. Nuclear Regulatory Commission Response to Nuclear Energy Institute 25-06 Guidance for Implementing the Requirements of 10 CFR Part 52 for Early Site Permit Renewal," (ML25209A488) dated July 28, 2025
 4. Entergy letter to NRC, "Letter-of-Intent to Submit License Amendment Requesting Using Digital Instrumentation and Control Interim Staff Guidance-(ISG)-06, Revision 2 and Request for NRC Fee Waiver," (ML19137A082) dated May 16, 2019
 5. Entergy letter to NRC, "Supplemental Information – Request for NRC Fee Waiver," (ML19255K330) dated September 12, 2019
 6. NRC letter to Entergy, In Response to Waterford Steam Electric Station, Unit 3 - Request for Fee Waiver Regarding Pilot Review of Digital Instrumentation and Control Interim Staff Guidance-06, Revision 2, (ML19280C270) dated October 30, 2019

cc: NRC Region IV Regional Administrator
NRC Senior Resident Inspector – GGNS
NRC Project Manager - GGNS