



Entergy Operations, Inc.  
1340 Echelon Parkway  
Jackson, MS 39213  
Tel 601-368-5573

**Mandy K. Halter**  
Director, Nuclear Licensing

10 CFR 50.80  
10 CFR 50.90

CNRO 2018-00048

November 15, 2018

U.S. Nuclear Regulatory Commission  
Director of the Office of Nuclear Reactor Regulation  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Subject: Transfer of Control of License – Order Response

Arkansas Nuclear One, Units 1 & 2 and ISFSI  
Docket Nos. 50-313, 50-368 & 72-13  
River Bend Station Unit 1 & ISFSI  
Docket Nos. 50-458 & 72-49  
Waterford 3 Steam Electric Station & ISFSI  
Docket Nos. 50-382 & 72-75  
Grand Gulf Nuclear Station & ISFSI  
Docket Nos. 50-416 & 72-50

- References:
- 1) Entergy Operations, Inc. (EOI) letter to U. S. Nuclear Regulatory Commission (NRC), "Arkansas Nuclear One, Units 1 & 2 and ISFSI, River Bend Station Unit 1 & ISFSI, Waterford 3 Steam Electric Station & ISFSI, Grand Gulf Nuclear Station & ISFSI, Application for Order Approving Transfers of Licenses and Conforming License Amendments," dated September 21, 2017 (ADAMS Accession No. ML17268A213)
  - 2) NRC letter to EOI, "Arkansas Nuclear One, Units 1 and 2; Grand Gulf Nuclear Station, Unit 1; River Bend Station, Unit 1; and Waterford Steam Electric Station, Unit 3 – Orders Approving Direct and Indirect Transfers of Facility Operating Licenses," dated August 1, 2018 (ADAMS Accession No. ML18177A236, ML18177A237, ML18177A235, ML18177A234)

Entergy Operations, Inc. (EOI) requested in a letter dated September 21, 2017 (Reference 1), pursuant to Section 184 of the Atomic Energy Act of 1954, as amended (the Act), 10 CFR 50.80, and 10 CFR 50.90, acting on behalf of the subject licensees, as well as their parent companies and itself (the Applicants), that the NRC issue an Order and conforming license

amendments approving the transfers of control of the Facility Operating and Independent Spent Fuel Storage Installation Licenses for Arkansas Nuclear One, Units 1 & 2 (ANO) and Grand Gulf Nuclear Station (GGNS), and if required, the Facility Operating and Independent Spent Fuel Storage Installation Licenses for River Bend Station (RBS) and Waterford 3 Steam Electric Station (Waterford). This request was approved in NRC letter dated August 1, 2018, (Reference 2).

Reference 2, Enclosure 1, "ANO, Units 1 and 2, Order," contained the following condition:

Before completion of the proposed transaction, EOI shall provide the Director of the Office of Nuclear Reactor Regulation satisfactory documentary evidence that EAL [Entergy Arkansas, LLC] has obtained the appropriate amount of insurance required of the licensees under 10 CFR Part 140 and 10 CFR Part 50.

The Enclosure of this letter contains a letter from American Nuclear Insurers (ANI) dated October 11, 2018 covering the 10 CFR Part 140 requirements and a letter from Nuclear Electric Insurance Limited (NEIL) dated November 15, 2018 covering the 10 CFR Part 50 requirements. These letters provide evidence that EAL has obtained the appropriate insurance for ANO.

Reference 2, Enclosure 1, "ANO, Units 1 and 2, Order," Enclosure 4, "RBS Order," and Enclosure 5, "Waterford Order," each contained the following order:

IT IS FURTHER ORDERED that, after receipt of all required regulatory approvals of the proposed transfer actions, EOI shall inform the Director of the Office of Nuclear Reactor Regulation in writing of such receipt, and of the date of closing of the transfers, no later than 5 business days before the date of the closing of the transfers....

EOI is hereby informing the Director of the Office of Nuclear Reactor Regulation that the date of closing will be on or about November 30, 2018.

EOI has reviewed the Draft Conforming Amendments for ANO Unit 1, ANO Unit 2 and Grand Gulf Nuclear Station (Grand Gulf) that were provided in Reference 2. ENO finds these are acceptable and request the amendments be issued with an effective date of November 30, 2018.

This letter contains no new regulatory commitments.

Should you have any questions or require additional information, please contact Bryan Ford, Senior Manager Regulatory Assurance, at (601) 368-5516.

Respectfully,

A handwritten signature in cursive script that reads "Mandy K. Halter".

Mandy K. Halter

MKH/chm

Enclosure: Proof of Insurance Letters for ANO

cc: NRC Region IV Regional Administrator  
NRC Project Manager – ANO  
NRC Project Manager – RBS  
NRC Project Manager – Waterford  
NRC Project Manager – Grand Gulf  
NRR Project Manager – EOI  
NRC Senior Resident Inspector – ANO  
NRC Senior Resident Inspector –RBS  
NRC Senior Resident Inspector –Waterford  
NRC Senior Resident Inspector –Grand Gulf

bcc w/o attachments:

C. Bakken (ECH)

Applicable COO(s)

John Ventosa – COO (GGN, WF3, RBS)

Lawrence Coyle – COO (ANO)

Applicable Site Vice President(s)

ANO

GGN

RBS

WF3

K. Jury (ECH)

R. Gaston (ECH)

M. Halter (ECH)

J. Giddens (ECH)

B. Ford (ECH)

L. J. Smith (ECH)

bcc w/ attachments:

Applicable Regulatory Assurance Manager(s)

ANO

GGN

RBS

WF3

**ENCLOSURE**

**CNRO 2018-00048**

**Proof of Insurance Letters for ANO**

(4 Pages Follow)



Jason Martinez, CPCU, ARM, ARe  
Director, Underwriting

October 11, 2018

Attn: Document Control  
Director, Office of Nuclear Regulatory Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Re: Entergy Arkansas, LLC  
NRC Operating License Transfer for Arkansas Nuclear One (ANO)  
Entergy Mississippi, LLC  
NRC Operating License Transfer for Grand Gulf Nuclear Station**

To Whom It May Concern,

This letter confirms that American Nuclear Insurers will write nuclear liability insurance for Entergy Arkansas, LLC for Arkansas Nuclear One (ANO), Units 1 & 2 and Entergy Mississippi, LLC for the Grand Gulf Nuclear Station.

As of the date of the license amendment, which is expected to be on or before November 30, 2018, we will amend the policy and certificates for the Arkansas Nuclear One (ANO) as follows:

- a. **Facility Form Policy No. NF -0210:** ANI will amend the named insured to "Entergy Arkansas, LLC and Entergy Operations, Inc." in lieu of "Entergy Arkansas, Inc. and Entergy Operations, Inc."
- b. **Master Worker Certificate No. NW -0590:** ANI will amend the named insureds to Entergy Arkansas, LLC and Entergy Operations, Inc." in lieu of "Entergy Arkansas, Inc. and Entergy Operations, Inc."
- c. **SFP Certificate No. N -0048:** ANI will amend the named insureds to "Entergy Arkansas, LLC and Entergy Operations, Inc." in lieu of "Entergy Arkansas, Inc. and Entergy Operations, Inc."
- d. **SFP Certificate No. N -0048:** ANI will add Entergy Arkansas, LLC to the Bond for payment of retrospective premiums. Entergy Arkansas, LLC is assuming all past and future liabilities of Entergy Arkansas, Inc. for the payment of retrospective premiums.

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October 11, 2018  
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- e. **SFP Certificate No. N -0068:** ANI will amend the named insureds to “Entergy Arkansas, LLC and Entergy Operations, Inc.” in lieu of “Entergy Arkansas, Inc. and Entergy Operations, Inc.”
- f. **SFP Certificate No. N -0068:** ANI will add Entergy Arkansas, LLC to the Bond for payment of retrospective premiums. Entergy Arkansas, LLC is assuming all past and future liabilities of Entergy Arkansas, Inc. for the payment of retrospective premiums.

We will also amend the policy and certificates for the Grand Gulf Nuclear Station as follows:

- a. **Facility Form Policy No. NF -0257:** ANI will amend the named insured to “Entergy Mississippi, LLC, Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative” in lieu of “Entergy Mississippi, Inc., Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative”.
- b. **Master Worker Certificate No. NW -0619:** ANI will amend the named insureds to “Entergy Mississippi, LLC, Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative” in lieu of “Entergy Mississippi, Inc., Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative”.
- c. **SFP Certificate No. N -0079:** ANI will amend the named insureds to “Entergy Mississippi, LLC, Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative” in lieu of “Entergy Mississippi, Inc., Entergy Operations, Inc., System Energy Resources, Inc. and Cooperative Energy, a Mississippi electric cooperative”.
- d. **SFP Certificate No. N -0079:** ANI will add Entergy Mississippi, LLC to the Bond for payment of retrospective premiums. Entergy Mississippi, LLC is assuming all past and future liabilities of Entergy Mississippi, Inc. for the payment of retrospective premiums.

The commitment to write insurance for Arkansas Nuclear One (ANO) and Grand Gulf Nuclear Station remains valid thru December 31, 2018. In the event the license transfers occurs after this date, ANI will review the existing circumstances prior to reinstating our commitment to provide insurance.

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October 11, 2018  
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Please feel free to contact me with any questions or concerns.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JM', with a horizontal line extending to the right.

Jason Martinez, CPCU, ARM, Are  
Director, Underwriting

C: Entergy – Rispoli, Ron & Murphy, Megin  
Stephens – Wilson, Mike





**MICHAEL W. KOLODNER, CPCU, ARM, ARE**  
*Vice President - Underwriting*

Nuclear Electric Insurance Limited  
1201 N Market St, Suite 1100  
Wilmington, DE 19801

November 15, 2018

*office* +1 302 573 2263 *mobile* +1 302 588 5654  
mkolodner@myneil.com

Eric Olvera  
Indemnity Specialist  
U.S. Nuclear Regulatory Commission  
Mail Stop 12D3  
1 White Flint North  
Rockville, MD 20852

**Re: Entergy Arkansas, LLC**

Dear Mr. Olvera:

This letter confirms that Nuclear Electric Insurance Limited will write nuclear property insurance for Entergy Arkansas, LLC as the owner of 100% of Arkansas Nuclear One. The insurance will be effective on the date of the transfer of the licensed plant from Entergy Arkansas, Inc. to Entergy Arkansas, LLC.

Effective on the closing date of the asset transfer, the following Primary Property and Decontamination Liability Policies, and Decontamination Liability, Decommissioning Liability and Excess Property Insurance Policies, for Arkansas Nuclear One will be amended to delete Entergy Arkansas, Inc. and add Entergy Arkansas, LLC:

Arkansas Nuclear One – P18-045 and BX18-001

The combined limits on the above policies will satisfy the NRC required minimum property insurance limit of \$1.06 billion in accordance with 10 CFR 50.54(w).

This commitment to write nuclear property insurance for Arkansas Nuclear One remains valid through December 31, 2018. If the asset transfer takes place after that date, we will review the circumstances before re-stating our commitment.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Kolodner", followed by a long horizontal line.

Michael W. Kolodner, CPCU, ARM, ARE  
Vice President – Underwriting

cc: Ronald Rispoli, Megin Murphy, Jager Smith, Bryan Ford, Howard Mahan,  
Katelyn Fowler, Scott Lauchlan, Peter Cavanaugh