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May 1, 2001
IPN-01-041
JPN-01-008
ENG C Ltr.-1.2.01.037
CNRO-2001-00023 *
(* Corrected May 9, 2001)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station PI-137
Washington, DC 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Pilgrim Nuclear Power Station
Docket No. 50-293
Arkansas Nuclear One, Units 1 & 2
Docket Nos. 50-313 & 50-368
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Waterford 3 Steam Electric Station
Docket No. 50-382
Grand Gulf Nuclear Station
Docket No. 50-416
River Bend Station
Docket No. 50-458
**Request for Exemption from 10 CFR 20.1003 Definition
of "Deep-Dose Equivalent" and Permission to Use
External Whole Body "Weighting Factors" Other than 1.0**

Dear Sir:

Pursuant to 10 CFR 20.2301, Entergy Operations, Inc. (EOI), Entergy Nuclear Operations, Inc. (ENOI) and Entergy Nuclear Generating Company (ENG C) [Entergy] request an exemption from the requirements of 10 CFR 20.1003, Definitions, for "*deep-dose equivalent*" and permission to use external whole body "*weighting factors*" other than 1.0 in calculating the "*effective dose equivalent*" for external exposures within the scope of 10 CFR 20.1202 and other applicable sections.

Entergy is proposing to use an alternate method for "weighting factors" based on Electric Power Research Institute (EPRI) research methodology that is also supported by the National Council on Radiation Protection and Measurements (NCRP). This methodology provides occupational

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dose results that more accurately reflect the effective exposure received by plant personnel. The proposed methodology for calculating occupational exposure does not impact the public or the worker's health and safety.

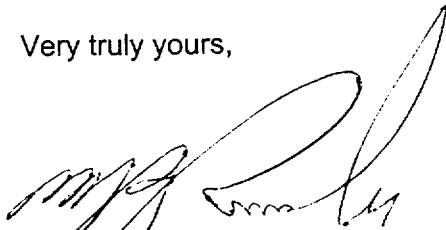
Attachments to this letter summarize the bases for this exemption request and permission to use other weighting factors.

Entergy plans to implement this exemption within sixty (60) days after receipt of NRC approval. No changes to the Technical Specifications are required; instead the licensees will continue compliance with 10 CFR 20 and the approved exemption by revising the applicable plant-specific radiation protection program and procedures. Entergy would like to arrange a meeting with the NRC staff to discuss this request. If you agree with this request, Entergy would be pleased to meet with you at your convenience.

Entergy requests NRC review and approval of this exemption request by December 2001.


If you have any questions, please contact Mr. J. Kelly at (914) 272-3370.

Very truly yours,



Michael R. Kansler
Senior Vice President and
Chief Operating Officer
ENOI, ENGC

Very truly yours,



Gary Taylor
Senior Vice President &
Chief Operating Officer
EOI

Attachment: Request for Exemption from 10 CFR 20.1203, "Deep-Dose Equivalent" and Permission to Use External Whole Body "Weighting Factors" Other Than 1.0

cc: Next Page

cc:

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ATTACHMENT to
IPN-01-041
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**REQUEST FOR EXEMPTION FROM 10 CFR 20.1003
DEFINITION OF "DEEP-DOSE EQUIVALENT" AND
PERMISSION TO USE EXTERNAL WHOLE BODY
"WEIGHTING FACTORS" OTHER THAN 1.0**

ENTERGY OPERATIONS, INC.
ENTERGY NUCLEAR OPERATIONS, INC.
ENTERGY NUCLEAR GENERATING COMPANY

May 1, 2001