

NRR-PMDAPEm Resource

From: Grange, Briana
Sent: Tuesday, May 24, 2016 2:40 PM
To: 'David.Dale@noaa.gov'
Subject: EFH for the Waterford Steam Electric Station, Unit 3, proposed license renewal
Attachments: 2015-05-28_Entergy to NMFS.pdf; 2015-06-24_NMFS to Entergy.pdf

Good morning David,

I am reaching out to you today regarding the Waterford Steam Electric Station, Unit 3 (WF 3) proposed license renewal. In March, my agency, the U.S. Nuclear Regulatory Commission (NRC), received an application from Entergy Louisiana, LLC and Entergy Operations, Inc. ("Entergy") for renewal of WF3 in St. Charles Parish, Louisiana. I am the staff person responsible for conducting the Essential Fish Habitat (EFH) consultation, if one is required. In its application, Entergy included letters to and from the NMFS Protected Resources Division but it doesn't appear that they contacted NMFS Habitat Conservation Division. I have attached those letters for your reference. I found your name within the NMFS's [Essential Fish Habitat – Gulf of Mexico](#) guidance and thought you might be a good person to reach out to first.

I'd like to touch base with you about 3 things today: (1) the potential for the proposed license renewal to affect EFH, (2) the opportunity for NMFS to participate in the NRC's National Environmental Policy Act (NEPA) scoping process, and (3) the NRC staff's environmental site visit in July.

EFH

I have used NMFS's EFH Mapper and determined that no EFH exists within the immediate project area. However, in the guidance document referenced above, p. 10 states that St. Charles Parish, LA, where WF3 is located, includes inland EFH. I am also aware that even if EFH is not present in the project area, NRC may need to assess the effects to EFH prey species or other indirect effects. **Would you be able to help me determine if I should prepare an EFH Assessment, and if so, which species I should consider in such an assessment? Alternately, would you be able to refer me to someone in your office that could help me with this?**

The details of the proposed action and a description of the location and operation of WF3 can be found in the Federal Register Notice (FRN) described below as well as in Entergy's Environmental Report, which you can access through the NRC's [Waterford License Renewal webpage](#).

NEPA Scoping Participation

NRC is conducting its NEPA scoping period for the proposed WF3 license renewal beginning in June. NRC will also be holding a scoping meeting June 8, 2016 from 7:00 p.m. to 9 p.m. at the St. Charles Parish Emergency Operation Center, 15026 River Road, Hahnville, Louisiana, 70057. You or a representative from your office is welcome to attend that meeting. You can also submit written comments through Regulations.gov. I included the draft FRN, which provides details on how to view Entergy's application and how to submit NEPA comments. **If you think you would like to attend the meeting, let me know, and I can put you in touch with the license renewal project manager, who can give you more details.**

NRC Environmental Site Visit

Finally, NRC staff will be visiting the WF3 site during the week of July 18, 2016. **If you or a representative from your office would like to attend all or a portion of that site visit, please let me know.** The site visit can be a good time for us to speak face-to-face with Entergy about any concerns NMFS has with the proposed license renewal, and it is also a good opportunity to tour the intake and discharge structures and generally gain

a better understanding of plant operations, which can facilitate a smoother EFH consultation process down the road.

Thanks so much for taking the time to read this long email! Please don't hesitate to reach out with any questions. My contact information is in my email signature. Thank you,

Briana

Briana A. Grange

Biologist

Division of License Renewal

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

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Hearing Identifier: NRR_PMDA
Email Number: 2865

Mail Envelope Properties (f9aa81cac83742d5bb1e7ac59eae10df)

Subject: EFH for the Waterford Steam Electric Station, Unit 3, proposed license renewal
Sent Date: 5/24/2016 2:40:10 PM
Received Date: 5/24/2016 2:40:00 PM
From: Grange, Briana

Created By: Briana.Grange@nrc.gov

Recipients:
"David.Dale@noaa.gov" <David.Dale@noaa.gov>
Tracking Status: None

Post Office: HQPWMSMRS03.nrc.gov

Files	Size	Date & Time
MESSAGE	3989	5/24/2016 2:40:00 PM
2015-05-28_Entergy to NMFS.pdf		726874
2015-06-24_NMFS to Entergy.pdf		469091

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:



Entergy Services, Inc
1340 Echelon Parkway
Jackson, Mississippi 39213

May 28, 2015

Mr. David Bernhart
Assistant Regional Administrator
NOAA Fisheries Service
Southeast Regional Office
Protected Resources Division
263 13th Avenue South
Saint Petersburg, Florida 33701

SUBJECT: Waterford 3 Steam Electric Station Unit 3
License Renewal Application

CEO 2015-00051

Dear Mr. Bernhart,

In 2016, Entergy Louisiana, LLC and Entergy Operations, Inc. (collectively referred to as "Entergy") plans to apply to the Nuclear Regulatory Commission (NRC) for renewal of the operating license for the Waterford Steam Electric Station Unit 3 (WF3), which is located in St. Charles Parish, Louisiana on the west (right descending) bank of the Mississippi River at River Mile 129.6, approximately 25 miles west of New Orleans, Louisiana and 50 miles southeast of Baton Rouge, Louisiana. The existing operating license for WF3 was issued for a 40-year term that expires in 2024. If the NRC approves the application, Entergy will then have the option to continue operating WF3 for an additional 20 years until 2044. In conjunction with this effort, Entergy is gathering information relative to this license renewal project to assist with the preparation of the application.

The NRC requires that the license renewal application for WF3 include an environmental report that assesses the potential environmental impacts from operation during the license renewal term. One of these potential environmental impacts would be

the effect of license renewal on designated essential fish habitat (EFH) or protected marine mammals within the immediate environs of the WF3 site (Figure 1). Accordingly, the NRC requires that the environmental report for each license renewal application assess such a potential effect (10 CFR 51.53). Later, during its review of the license renewal environmental report pursuant to the National Environmental Policy Act, the NRC may request information from your office to ensure compliance with the Magnuson-Stevens Fishery Conservation and Management Act, and the Marine Mammal Protection Act.

Entergy is contacting you now in order to obtain input regarding issues that may need to be addressed in the WF3 license renewal environmental report, and to assist in identifying any information your staff believes would be helpful to expedite NRC's review.

During Entergy's review, it was determined that no designated EFH exists for the Federally-listed threatened gulf sturgeon, *Acipenser oxyrinchus desotoi*, which may pass the WF3 site during the spawning season. Although the West Indian manatee, *Trichechus manatus*, is known to inhabit Lakes Pontchartrain and Maurepas and associated coastal waters and streams during summer months, the last known sighting of this species in the Mississippi River was 1975. We do not believe that suitable habitat exists at the ELL site for manatees either.

However, even with designated EFH for the gulf sturgeon or the presence of the West Indian manatee in the immediate environs of WF3 (Figure 1), Entergy does not expect WF3 operations during the license renewal term to adversely affect either species since there are no plans to alter current operations during the 20-year license renewal period, and the fact that license renewal will not involve any offsite activities. Although administrative procedural controls are in place to comply with applicable state and federal laws to preserve biological resources when facility changes do occur, no changes are planned or needed in support of license renewal.

After your review of the information provided in this letter, I would appreciate you sending a letter detailing any concerns you may have about potential impacts to designated EFH for the gulf sturgeon or protection of the West Indian manatee within the immediate environs of WF3, or alternatively, confirming our conclusion that there is no designated EFH for the gulf sturgeon within the immediate environs and that the likelihood of the West Indian manatee being adversely affected as a result of continued operations of WF3 for an additional 20 years would be minimal. Entergy will include copies of this letter and your response in the environmental report submitted to the NRC as part of the WF3 license renewal application.

If you have any questions, please contact me at (601) 368-5823 or through my email address, rbuckle@entergy.com.

A handwritten signature in black ink that reads "Rick Buckley". The script is cursive and fluid, with the first name "Rick" and last name "Buckley" clearly legible.

Rick Buckley, CHMM, REM
Sr. Project Manager, Environmental

Figure 1
Location of Entergy Property, 6-Mile Radius Map



Legend

- | | | | |
|--|---------------|--|-------------------|
| | Airport | | Property Boundary |
| | Helipoint | | Interstate |
| | Surface Water | | U.S. Route |
| | 6-Mile Radius | | State Route |
| | Census Place | | Local Roads |
| | Parish | | Railroad |



0 2 4 Miles

BUCKLEY, RICKY N

From: Kelly Shotts - NOAA Federal <kelly.shotts@noaa.gov>
Sent: Wednesday, June 24, 2015 2:32 PM
To: BUCKLEY, RICKY N
Subject: Re: Waterford 3 Steam Electric Station Unit 3 - Gulf sturgeon

EXTERNAL SENDER. DO NOT click links if sender is unknown. DO NOT provide your user ID or password.

Hi Rick,

Thank you for speaking with me earlier today. As we discussed, under the Magnuson-Stevens Fishery Conservation and Management Act, EFH is designated for federally managed fishery species (e.g., shrimp, reef fish, and red drum). There is no Essential Fish Habitat (EFH) designated for Gulf sturgeon. More information on EFH can be found at the following website:

http://sero.nmfs.noaa.gov/habitat_conservation/efh/index.html

Gulf sturgeon is not a fishery species, rather it is listed as threatened under the Endangered Species Act. Critical habitat for Gulf sturgeon has been designated in the Gulf of Mexico, including in Lake Pontchartrain (Unit 8). Gulf sturgeon information and maps of Gulf sturgeon critical habitat can be found at the following websites:

Species Information
<http://www.nmfs.noaa.gov/pr/species/fish/gulfsturgeon.htm>

Critical Habitat Maps and GIS files
http://sero.nmfs.noaa.gov/maps_gis_data/protected_resources/critical_habitat/index.html

Based on the shortest distance between the project location you provided in your letter and the closest area designated as Gulf sturgeon critical habitat, your project appears to be at least 19 miles away from critical habitat. However, please confirm this yourself using the information provided above.

If you have any other questions, please feel free to contact me.

Kelly

On Wed, Jun 24, 2015 at 9:37 AM, Kelly Shotts - NOAA Federal <kelly.shotts@noaa.gov> wrote:
Hi Rick,

I just left you a voicemail pertaining to your May 28, 2015, letter regarding the subject project. Please give me a call at your earliest convenience to discuss issues related to Gulf sturgeon and their habitat. My direct line is [727-551-5603](tel:727-551-5603).

Thanks for coordinating with us!
Kelly

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Kelly Shotts
Section 7 Coordinator
Protected Resources Division
NOAA Southeast Regional Office
National Marine Fisheries Service
263 13th Ave S
St. Petersburg, FL 33701

Ph: [727-824-5312](tel:727-824-5312)
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