



Entergy Operations, Inc  
Waterford 3 SES  
17265 River Road  
Killona, LA 70057  
Tel 504 739 6650

W3B0-2006-0037  
A4.06  
PR

Via-Hand Delivery to LDEQ

September 18, 2006

La. Dept. of Environmental Quality  
Environmental Services  
Water Permits Division  
Lenny Young, Administrator  
P. O. Box 4313  
Baton Rouge, LA 70821-4313

Subject: Waterford Steam Electric Station - Unit Number 3  
Agency Interest Number 35260  
LPDES Permit Number LA0007374

RE: Response to Proposal for Information Collection (PIC) Comments

Dear Mr. Young:

Entergy Louisiana, LLC's Waterford 3 nuclear facility has received comments from LDEQ dated August 17, 2006 on the Waterford 3 Proposal for Information Collection (PIC) submittal as required by the 316 (b) Phase II Rule in accordance with 40 CFR 125.95 section (b)(1). LDEQ's comments received by other Entergy Louisiana plants in the lower Mississippi River area (Waterford 1&2, Little Gypsy, Ninemile and Willow Glen) are almost identical with respect to 40 CFR 125.95 (b)(1)(ii), particularly, in relation to the use of existing historical data to characterize current conditions at the site and to demonstrate that appropriate QA/QC procedures were used to collect data. The same is true for LDEQ's comment related to 40 CFR 125.95(b)(1)(iv) regarding any new sampling plans to demonstrate current rates of impingement at all of these sites.

Entergy Louisiana understands the LDEQ comments are nearly identical due to the fact that Entergy Louisiana's compliance strategy is similar for the five utility plants based on their close proximity along the lower stem of the river as related to waterbody characterization and impingement rates.

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Entergy Louisiana believes that these comments can be adequately addressed by the early submittal of an Impingement Mortality & Entrainment Characterization Study or IMECS. The rule indicates the submittal of this type of detailed analytical information is routinely contained within the Compliance Demonstration Study required by January 7, 2008. As stated in Entergy Louisiana's August 22<sup>nd</sup> presentation to LDEQ, and in response to the LDEQ August 17, 2006 Waterford 3 comment letter, Entergy Louisiana now proposes to submit the completed Waterford 1&2 IMECS that adequately addresses the similar comments received by LDEQ for both Waterford 1 & 2 and for Waterford 3.

On August 28, 2006, Entergy Louisiana submitted to the LDEQ the draft IMECS for Waterford 1&2 that is currently in LDEQ's office under review. Waterford 3 requests that LDEQ treat this submission as also applicable to the pending Waterford 3 PIC in response to comments received by LDEQ for Waterford 3. We respectfully encourage LDEQ to consider this request and to prepare a written response as soon as possible to allow Waterford 3 sufficient time to continue with its current strategy to submit the Compliance Demonstration Study as expeditiously as practicable, but no later than January 7, 2008.

Should you have any questions or comments, please contact Mr. Mark J. Louque at (504) 464-3267.

Sincerely,



Joseph E. Venable  
Vice President, Operations-Waterford 3

JEV/MJL/mjl

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cc:	Ross Hartfield	LDEQ
	Yvonne Baker	LDEQ
	Barbra Romanowski	LDEQ
	Cheryl Lejunne	LDEQ
	J. L. Hornsby	W-MSB4-238
	M. J. Louque	W-MSB4-238
	K.T. Walsh	W-MSB4-300
	Waterford 3 Records Center	

ecc:	R. N. Buckley	M-ECH-595
	G.M. VonBodungen	L-LITG-4
	Jim Schott	T-PKWD-4
	Chuck Barlow	M-ELEC-6B
	Sandra Davidson	T-PKWD-4I