February 20, 2012

CERTIFIED MAIL

Mr. Steve Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 S. Crystal Drive
5th Floor, N-5838
Arlington, VA 22202-2733

Re: NRG Texas Power, LLC – Limestone Electric Generating Station
Reply to Request for Action Plan

Dear Mr. Hoffman:

On February 16, 2012, NRG Texas Power, LLC received via email from your office the cover letter and engineering contractor recommendations and conclusions dated January 12, 2012 from the final assessment report to ensure the safety of the Coal Combustion Residuals (CCR) impoundments at the Limestone Electric Generating Station. There were no actions or recommendations listed in Enclosure 2 to be undertaken to ensure the structural stability of the CCR management units at the Limestone Station. In addition, the classification for continued safe and reliable operation was "satisfactory" for both CCR management units at the Station. This letter responds to EPA's request for an action plan.

Following the site visit conducted by EPA's Engineering Contractor, Dewberry Inc. on February 22, 2011, NRG contracted with a firm who specializes in geotechnical investigations to conduct a structural evaluation of the two CCR impoundments (DSDA and ST-18) at the Limestone Station. Structural stability analyses were conducted on the side-slopes for both ponds to calculate the Factors of Safety. The results of the slope stability analyses reported that both of the pond side-slopes have adequate factors of safety against a global failure. Based on the reported Factors of Safety and the fact that the facility is located in a low seismic activity region, NRG agrees with conclusions presented in Enclosure 2 that "a pseudo-static seismic analysis is not necessary to further characterize the structural soundness of the dam embankments".

NRG concurs with the conclusions and recommendations presented in Enclosure 2 that there are no apparent indications of unsafe conditions or conditions needing remedial action which could affect the structural stability of the CCR management units. Based on the fact that not a single deficiency was identified in the final report, we believe that the development of an Action Plan is not warranted at this time. NRG will continue to manage all CCR management units in a manner that is protective of human health and the environment and is committed to responsible environmental stewardship and safety at each of its facilities.

Thank you for this opportunity to review and respond to the final report. Please feel free to contact me at (713) 537-2145 should you have any questions.

Sincerely,

Jeffrey M. Davis

Jeffrey M. Davis
Environmental Manager