



NUCLEAR ENERGY INSTITUTE

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September 12, 2007

Mr. Nilesh C. Chokshi
Deputy Director
Division of Site and Environmental Review
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments on Proposed Seismic Interim Staff Guidance

Project Number: 689

Dear Mr. Chokshi:

The industry appreciates the opportunity to comment on the staff's proposed interim staff guidance (ISG) in support of seismic evaluations. This document represents years of work from the industry and NRC staff to update the seismic methodologies and prepare for new plant licensing.

We commend the work of the staff in supporting these evaluations and appreciate the comprehensive and thorough nature of the document. The industry has brought in top experts on seismology to study this issue. As the staff has noted, these individuals tend to follow a more academic timeline than any of us would like, but their work is world renowned. We appreciate the staff's patience in working with them to review technical reports focusing solely on seismic considerations for nuclear power plant sites that were prepared in support of our efforts.

Our comments provided in this letter are largely requests for clarification to ensure consistent interpretation of the guidance over time. This will be critical to our mutual success in closing out these issues since we believe the purpose of this ISG is to provide a single regulatory position on each issue that can be referenced by reviewers and industry alike without question.

There are is one area from enclosure 4 where we feel additional dialogue is warranted:

- In enclosure 4, item 3.1 regarding SSI and Structural Models the guidance states justification should be provided that the SSI and structural models adequately transmit the high frequency ground motion to obtain IRS needed to evaluate high frequency components. Practical analytical modeling limitations will dictate what is achievable. Specifically the text states, "SSI and structural models are of adequate refinement". The industry proposes further interaction with NRC to arrive at a consensus as to what defines "adequate refinement".

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We would appreciate the opportunity to discuss this item and any questions you may have regarding our comments on the ISG document at your earliest convenience.

Again, we thank you for the efforts to provide this ISG and your willingness to work with us on this complex technical issue. We look forward to a continued dialogue on these topics. If you have any questions on this letter or its enclosure, please contact me or Leslie Kass at (202) 739-8115; lck@nei.org.

Sincerely,



Leslie C. Kass on behalf of Adrian P. Heymer

Enclosure

c: Mr. Goutam Bagchi, NRC
Dr. Andrew J. Murphy, NRC
NRC Document Control Desk