W/O EP

No Δ Risk Seismic + slow progression

Not true for heavy load drop

($> 5 \times 10^{-7}$ per year)

λ-level

action at set level

1. No Δ Risk slow progression events

2. No Δ risk seismic

   a. ~~[illegible]~~ ≥ 1.2 g PSA each vertical acceleration

      Well-beyond DBE (flat curves)

   b. Infrastructure greatly damaged at such a g-level

   c. Will have communication by commitment

      National guard helicopters to warn

      other?

      4-wheel drive vehicles

equivalent E.P.

λ-level handout portable radios?

   d. Most impt evacuation in 1st few miles.

      Concentrate there

   e. Latents driven by land interdiction policy

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3. Heavy load drop -
a. SFP crane (inferior)

b. load drop analysis

c. NRC inspector on-site during moves > 50 tons.
i. check load path
ii " rigging
iii " weight of cask/heavy load
iv " operators/procedures

d < 5×10^{-7}/year

Exemption

1. Not a public benefit
2. Either special exception or meets underlying purpose of rule.

EP

1) limit consequences to public from commercial nuclear power plant accidents
2) increase public confidence
3). link with state + local governments

Meets Underlying Purpose of Rule

EP

Underlying

A. Protect public H&S Limit Public Exposure (No difference)

B. Give public good feeling (No)

C. /