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From: Goutam Bagchi NRR
To: David Diec, Diane Jackson, George Hubbard, Glenn Kelly, Joseph Staudenmeier, NRR
Robert Palla, Tanya Eaton
Date: 10/4/00 3:47PM
Subject: Re: TWG Conclusions

George,
I have excerpted below the conclusions that I have comments on. My comments are redline strikeout version. For WNP 2 site there is a seismic hazard curve submitted under IPEEE and I do not believe that using this site specific hazard curve the spent fuel pool failure frequency, if it passes the seismic check list, would be greater than 1XE-5 per year. Absent this kind of result, we should not put this one west coast site into the outlier group.

1. They meet the industry design commitments (IDCs), the staff design assumptions (SDAs), the seismic checklist, and have a zirconium fire frequency less than1X10-5 per year (PPG).

2. This is based on the discussion in the report that the risk at the PPG is sufficiently low that a small change in risk is acceptable consistent with the guidance in RG 1.174. The report finds that a reduction in off-site EP is a "small change". By passing the seismic checklist, we are concluding that all **currently operating** CEUS sites would have a frequency of **a** zirconium fire equal to or less than **1X10E-5 per year** using the **frequencies of the** LLNL hazard estimates. **All but one CEUS site would meet the PPG if it passed the seismic checklist.** For **that** one **CEUS** plant and the **3 2** West coast plants they would have to demonstrate a SFP capacity that would reduce the fire frequency to less than **or equal to** the PPG before it could reduce off-site EP.

Thank you,
Goutam
301-415-3305

>>> George Hubbard 10/04 3:06 PM >>>
Please review the attached conclusions and provide your feedback to Tim or myself. We need feedback ASAP.

Thanks,

George Hubbard
2870

CC: Timothy Collins

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