Thoughts on the NEI review of the Staff analysis of SFP

1. Their conclusions on the conditions that should help reduce problems given in Chapter 5 are pretty consistent with NRC thoughts I would guess. Certainly we addressed many of them in the HRA.

2. The criticism of the initiating event frequency for loss of inventory seems justified partially at least. It is true that all these events were terminated, probably by human action. Many (maybe all) would have been self limiting. The biggest impact was probably a loss of cooling (due to NPSH problems for example) and for these it would be required to restore inventory before reestablishing cooling. The event tree in the staff analysis addresses the restoration of inventory but not reestablishing cooling.

3. The changes proposed for the loss of offsite frequency and recovery are not in themselves significant. There is some change to the grid centered recovery which would drive the sequence S13 down an order of magnitude but there is really no justification for the extrapolation of the curve to such long times. As a justification of not cutting this off too soon, remember the ice storms last year that had some houses without power for five days or more.

4. Heavy load drop. Playing games with distributions is not science. The point here is that the estimates are close enough to 1E-06 that it makes no difference.

5. The fail to start and run for a diesel fire pump in our analysis is a little high, and it's not easy to see where the INEEL number comes from, even looking back to NUREG/CR 4550. However, the pedigree of the ALWR data base needs to be checked also.

6. Inconsistencies on the tornado results need to be corrected. Also, it is true that the results are for the highest tornado susceptibility.

7. We agreed that the HRA needs to be revisited, and it is in the process of being revised.