From: Gareth Parry / NRR
To: George Hubbard, Goutam Bagchi, Nilesh Chokshi
Date: Mon, Aug 14, 2000 4:24 PM
Subject: Re: Spent Fuel Pool Decommissioning: Seismic Screening

Goutam:

You may notice that these are the same points I made last week.

1. Do we really want to quote the 1.3E-06 number in this first paragraph since it's an arbitrary choice? Furthermore, don't we want to get away from the 3XSSE and 2XSSE discussion, because it really doesn't have any relevance.

2. Second paragraph in the Current approach section, sentences beginning, "These large uncertainties make it difficult to compare, etc. " I don't think it's necessary to discuss the differences between the seismic risk and the other sources of risk vis a vis uncertainty. If we looked at the internal events we could put a tremendous uncertainty there too, based on the HRA alone. It's enough to say that we need to consider the uncertainties when making a decision. Besides the comparison is somewhat moot given the dominance of the seismic contribution.

3. Sources of Conservatism, item no.2. The hazard issue is an uncertainty issue, not a conservatism. Sure the LLNL curves are more conservative than the EPRI curves, but who's to say that they are not actually optimistic even? The point is, unless the LLNL hazard curves were deliberately chosen to be based on conservative assumptions related to the inputs it is not correct to characterize them as being conservative.

4. In the section entitled Quantification of Uncertainty, isn't what you are talking about conservatism rather than uncertainty?

Gareth

CC: David Diec, Diane Jackson, Glenn Kelly, John Ha...

4/253