

**Comments Concerning Seismic Screening
And Seismic Risk of Spent Fuel Pools for
Decommissioning Plants**

by
Robert P. Kennedy
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1. Introduction

I have been requested by Brookhaven National Laboratory, in support of the Engineering Research Applications Branch of the Nuclear Regulatory Commission, to review and comment on certain seismic related aspects of References 1 through 4. Specifically, I was requested to comment on the applicability of using seismic walkdowns and drawing reviews conducted following the guidance provided by seismic screening tables (seismic check lists) to assess that the risk of seismic-induced spent fuel pool accidents is adequately low. The desire is to use these seismic walkdowns and drawing reviews in lieu of more rigorous and much more costly seismic fragility evaluations. It is my understanding that the primary concern is with a sufficiently gross failure of the spent fuel pool so that water is rapidly drained resulting in the fuel becoming uncovered. However, there may also be a concern that the spent fuel racks maintain an acceptable geometry. It is also my understanding that any seismic walkdown assessment should be capable of providing reasonable assurance that seismic risk of a gross failure of the spent fuel pool to contain water is less than the low 10^{-6} mean annual frequency range. My review comments are based upon these understandings.

2. Background Information

The NRC Draft Technical Study of Spent Fuel Pool Accidents (Ref. 1) assumes that spent fuel pools are seismically robust. Furthermore, it is assumed that High-Confidence-Low-Probability-of Failure (HCLPF) seismic capacity of these pools is in the range of 0.4 to 0.5g peak ground acceleration (PGA). This HCLPF capacity (C_{HCLPF}) corresponds to approximately a 1% mean conditional probability of failure capacity ($C_{1\%}$), i.e.:

$$C_{HCLPF} \gg C_{1\%} \quad (1)$$

as shown in Ref. 10.

In Ref. 5, detailed seismic fragility assessments have been conducted on the gross

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RPK

Structural Mechanics Consulting
18971 Villa Terrace, Yorba Linda, CA 92886
714 777-2163 · 714 777-8299 (Fax)

structural failure of spent fuel pools for two plants: Vermont Yankee (BWR), and Robinson (PWR). The following HCLPF seismic capacities are obtained from the fragility information in Ref. 5:

$$\begin{aligned} \text{Vermont Yankee (BWR):} & \quad C_{\text{HCLPF}} = 0.48g \text{ PGA} \\ \text{Robinson (PWR):} & \quad C_{\text{HCLPF}} = 0.65g \text{ PGA} \end{aligned} \tag{2}$$

These two fragility estimates provide some verification of the HCLPF capacity assumption of 0.4 to 0.5g PGA used in Ref. 1.

I am confident that a set of seismic screening tables (seismic check lists) can be developed to be used with seismic walkdowns and drawing reviews to provide reasonable assurance that the HCLPF capacity of spent fuel pools is at least in the range of 0.4 to 0.5g PGA for spent fuel pools that pass such a review. However, in order to justify a HCLPF capacity in the range of 0.4 to 0.5g PGA, these screening tables will have rather stringent criteria so that I am not so confident that the vast majority of spent fuel pools will pass the screening criteria. The screening criteria (seismic check lists) summarized in Ref. 4 provides an excellent start. The subject of screening criteria is discussed more thoroughly in Section 3.

Once the HCLPF seismic capacity (C_{HCLPF}) has been estimated, the seismic risk of failure of the spent fuel pool can be estimated by either rigorous convolution of the seismic fragility (conditional probability of failure as a function of ground motion level) and the seismic hazard (annual frequency of exceedance of various ground motion levels), or by a simplified approximate method. This subject is discussed more thoroughly in Ref. 10.

A simplified approximate method is used in Ref. 1 to estimate the annual seismic risk of failure (P_F) of the spent fuel pool given its HCLPF capacity (C_{HCLPF}). The approach used in Ref. 1 is that:

$$P_F = 0.05 H_{\text{HCLPF}} \tag{3}$$

where H_{HCLPF} is the annual frequency of exceedance of the HCLPF capacity. Ref. 1 goes on to state that for most Central and Eastern U.S. (CEUS) plants, the mean annual frequency of exceeding 0.4 to 0.5g PGA is on the order of or less than 2×10^{-5} based on the Ref. 8 hazard curves. Thus, from Eqn. (3), the annual frequency of seismic-induced gross failure (P_F) of the spent fuel pool is on the order of 1×10^{-6} or less for most CEUS plants.

Unfortunately, the approximation of Eqn. (3) is unconservative for CEUS hazard curves that have shallow slopes. By shallow slopes, I mean that it requires more than a factor of 2 increase in ground motion to correspond to a 10-fold reduction in the annual frequency of exceedance. For most CEUS sites, Ref. 8 indicates that a factor of 2 to 3 increase in ground motion is required to reduce the hazard exceedance frequency from 1×10^{-5} to 1×10^{-6} . Over this range of hazard curve slopes, Eqn. (3) is always unconservative and will be unconservative by a factor of 2 to 4. Therefore, a HCLPF capacity in the range of 0.4 to 0.5g PGA is not sufficiently high to achieve a spent fuel pool seismic risk of failure on the order of 1×10^{-6} or less for most CEUS plants.

However, HCLPF capacities this high are sufficiently high to achieve seismic risk estimates less than 3×10^{-6} for most CEUS plants based upon the Ref. 8 hazard curves. This subject is further discussed in Section 4.

In lieu of using a simplified approximate method, Ref. 2 has estimated the seismic risk of spent fuel pool failure by rigorous convolution of the seismic fragility and seismic hazard estimates for the 69 CEUS sites for which seismic hazard curves are given in Ref. 8. Ref. 2 has divided the sites into 26 BWR sites and 43 PWR sites.

For the 26 BWR sites, Ref. 2 used the fragility curve defined in Ref. 5 for Vermont Yankee with the following properties:

<u>BWR Sites</u>			
Median Capacity	$C_{50} = 1.4$	PGA	
HCLPF Capacity	$C_{HCLPF} = 0.48g$	PGA	(4)

Using the Ref. 8 seismic hazard estimates and the Eqn. (4) fragility, Ref. 2 obtained spent fuel pool mean annual failure probabilities ranging from 12.0×10^{-6} to 0.11×10^{-6} and averaging 1.6×10^{-6} for the 26 BWR sites. In my judgment, seismic screening criteria (seismic check lists) can be developed which are sufficiently stringent so as to provide reasonable assurance that the seismic capacity of spent fuel pools which pass the seismic screening roughly equals or exceeds that defined by Eqn. (4). With such a fragility estimate, based on the Ref. 8 seismic hazard estimates, for most CEUS sites, the estimated spent fuel pool seismic-induced failure probability will be less than 3×10^{-6} as further discussed in Section 4.

For the 43 PWR sites, Ref. 2 used the fragility curve defined in Ref. 5 for Robinson with the following properties:

<u>PWR Sites</u>			
Median Capacity	$C_{50} = 2.0$	PGA	
HCLPF Capacity	$C_{HCLPF} = 0.65g$	PGA	(5)

Using the Ref. 8 seismic hazard estimates and the Eqn. (5) fragility, Ref. 2 obtained spent fuel pool mean annual failure probabilities ranging from 2.5×10^{-6} to 0.03×10^{-6} and averaging 0.48×10^{-6} for the 43 PWR sites. A fragility curve as high as that defined by Eqn. (5) is necessary to achieve an estimated spent fuel pool seismic-induced failure probability as low as 1×10^{-6} for nearly all CEUS sites. However, I don't believe realistic seismic screening criteria can be developed which are sufficiently stringent to provide reasonable assurance that the Eqn. (5) seismic fragility is achieved. In my judgment, a more rigorous seismic margin evaluation performed in accordance with the CDFM method described in Refs. 6 or 7 would be required to justify a HCLPF capacity as high as that defined by Eqn. (5).

3. Development and Use of Seismic Screening Criteria

Screening criteria are very useful to reduce the number of structure, system, and component (SSC) failure modes for which either seismic fragilities or seismic margin HCLPF capacities need to be developed. Screening criteria are presented in Ref. 6 for SSCs for which failures might lead to core damage. These screening criteria were established by an NRC sponsored "Expert Panel" based upon their review of seismic fragilities and seismic margin HCLPF capacities computed for these SSCs at more than a dozen nuclear power plants, and their review of earthquake experience data. These screening criteria were further refined in Ref. 7.

The screening criteria of Refs. 6 and 7 are defined for two seismic margin HCLPF capacity levels which will be herein called Level 1 and Level 2. Refs. 6 defines these two HCLPF capacity levels in terms of the PGA of the ground motion. However, damage to critical SSCs does not correlate very well to PGA of the ground motion. Damage correlates much better with the spectral acceleration of the ground motion over the natural frequency range of interest which is generally between 2.5 and 10 Hz for nuclear power plant SSCs. For this reason, Ref. 7 defines these same two HCLPF capacity levels in terms of the peak 5% damped spectral acceleration (PSA) of the ground motion. The two HCLPF capacity screening levels defined in Refs 6 and 7 are:

	HCLPF Screening Levels	
	Level 1	Level 2
PGA (Ref. 6)	0.3g	0.5g
PSA (Ref. 7)	0.8g	1.2g

These two definitions (PGA and PSA) are consistent with each other based upon the data upon which these screening levels are based. However, in my judgment, it is far superior to use the Ref. 7 PSA definition for the two screening levels when convolving a fragility estimate with CEUS seismic hazard estimates. For these CEUS seismic hazard estimates from Ref. 8, the ratio PSA/PGA generally lies in the range of 1.8 to 2.4 which is lower than the PSA/PGA ratio of the data from which the screening tables were developed. A more realistic and generally lower estimate of the annual probability of failure will result when the seismic fragility is defined in terms of PSA and convolved with a PSA hazard estimate in which the PSA hazard estimate is defined in the 2.5 to 10 Hz range.

In the past, a practical difficulty existed with defining the seismic fragility in terms of PSA instead of PGA. The Ref. 8 PSA hazard estimates are only carried down to 10^{-4} annual frequency of exceedance whereas the PGA hazard estimates are extended down to about 10^{-6} . Since it is necessary for the hazard estimate to be extended to at least a factor of 10 below the annual failure frequency being predicted, it has not been practical to use the PSA seismic fragility definition with the Ref. 8 hazard estimates. However, this difficulty has been overcome by Ref. 9 prepared by the Engineering Research Applications Branch of the Nuclear Regulatory Commission which extends the PSA seismic hazard estimates also down to 10^{-6} . Ref. 9 is attached herein as Appendix A.

In order to achieve a seismic induced annual failure probability P_f in the low 10^{-6} range for nearly all of the CEUS spent fuel pools with the Ref. 8 hazard estimates, it is necessary to apply the Level 2 screening criteria of Refs. 6 or 7, i.e., screen at a HCLPF seismic capacity of 1.2g PSA (equivalent to 0.5g PGA). The seismic screening criteria presented in Ref. 4 is properly based upon screening to Level 2. Furthermore, Ref. 4 appropriately summarizes the guidance presented in Ref. 7 for screening to Level 2. In general, I support the screening criteria defined in Ref. 4. However, I do have three concerns which are discussed in the following subsections.

3.1 Out-of-Plane Flexural and Shear Failure Modes for Spent Fuel Pool Concrete Walls and Floor

The screening criteria for concrete walls and floor diaphragms were developed to provide seismic margin HCLPF capacities based upon in-plane flexural and shear failures of these walls and diaphragms. For typical auxiliary buildings, reactor buildings, diesel generator buildings, etc., it is these in-plane failure modes which are of concern. For normal building situations, seismic loads are applied predominately in the plane of the wall or floor diaphragm. Out-of-plane flexure and shear are not of significant concern. As one the primary authors of the screening criteria in both Refs. 6 and 7, I am certain that these screening criteria do not address out-of-plane flexure and shear failure modes.

For an aboveground spent fuel pool in which the pool walls (and floor in some cases) are not supported by soil backfill, it is likely that either out-of-plane flexure or shear will be the expected seismic failure mode. These walls and floor slab must carry the seismic-induced hydrodynamic pressure from the water in the pool to their supports by out-of-plane flexure and shear. It is true that these walls and floor are robust (high strength), but they may not be as ductile for out-of-plane behavior as they are for in-plane behavior. For an out-of-plane shear failure to be ductile requires shear reinforcement in regions of high shear. Furthermore, if large plastic rotations are required to occur, the tensile and compression steel needs to be tied together by closely spaced stirrups. I question whether such shear reinforcement and stirrups exist at locations of high shear and flexure in the spent fuel pool walls and floor. As a result, I suspect that only limited credit for ductility can be taken.

Without taking credit for significant ductility, it is not clear to me that spent fuel pool walls and floors not supported by soil can be screened at a seismic HCLPF capacity level as high as 1.2g PSA (equivalent to 0.5g PGA). I am aware of only one seismic fragility analysis having been performed on such unsupported spent fuel pool walls. That analysis was the Vermont Yankee spent fuel pool analysis reported in Ref. 5 for which the reported seismic HCLPF capacity was 0.48g PGA. A single analysis case does not provide an adequate basis for establishing a screening level for all other cases, particularly when the computed result is right at the desired screening level. The screening criteria in Refs 6 and 7 are based upon the review of many cases at more than a dozen plants.

In my judgement, it will be necessary to have either seismic fragility or seismic margin HCLPF computations performed on at least six different aboveground spent fuel pools with walls not supported by soil before out-of-plane flexure and shear HCLPF capacity screening levels can be established for such spent fuel pools.

3.2 Spent Fuel Pool Racks

I don't know whether a gross structural failure of the spent fuel racks is of major concern. This is a topic outside of my area of expertise. However, if such a failure is of concern, no seismic HCLPF capacity screening criteria is available for such a failure. The screening criteria of Refs. 6 and 7 were never intended to be applied to spent fuel pool racks. Since I have never seen a seismic fragility or seismic margin HCLPF capacity evaluation of a spent fuel pool rack, I have no basis for deciding whether these racks can be screened at a seismic HCLPF capacity as high as 1.2g PSA (equivalent to 0.5g PGA).

3.3 Seismic Level 2 Screening Requirements

In order to screen at a seismic HCLPF capacity of 1.2g PSA (0.5g PGA), the Level 2 screening criteria for concrete walls and diaphragms requires that such walls and diaphragms essentially comply with the ductile detailing and rebar development length requirements of either ACI 318.71 or ACI 349.76 or later editions. It is not clear to me how many CEUS spent fuel pool walls and floors essentially comply with such requirements since earlier editions of these codes had less stringent requirements. Therefore, it is not clear to me how many spent fuel pool walls and floors can actually be screened at Seismic Level 2 even for in-plane flexure and shear failure mode.

4. Seismic Risk Associated With Screening Level 2

4.1 Simplified Approaches for Estimating Seismic Risk Given the HCLPF Capacity

As mentioned in Section 2, the seismic risk of failure of the spent fuel pool can be estimated by either rigorous convolution of the seismic fragility and the seismic hazard, or by a simplified approximate method. The simplified approximate method defined by Eqn. (3) was used in Ref. 1. However, as also mentioned in Section 2, this approximate method understates the seismic risk by a factor of 2 to 4 for typical CEUS hazard estimates.

Ref. 10 presents an equally simple approach for estimating the seismic risk of failure of any component given its HCLPF capacity C_{HCLPF} and a hazard estimate. This approach tends to introduce from 0% to 25% conservative bias to the computed seismic risk when compared with rigorous convolution. Given the HCLPF capacity C_{HCLPF} this approach consists of the following steps:

Step 1: Estimate the 10% conditional probability of failure capacity $C_{10\%}$ from:

(6)

where β is the logarithmic standard deviation of the fragility estimate and 1.044 is the difference between the 10% non-exceedance probability (NEP) standard normal variable (-1.282) and the 1% NEP standardized normal variable (-2.326). F_β is tabulated below for various fragility logarithmic standard deviation β values.

β	Median/CDFM Capacity ($C_{50\%}/C_{CDEM}$)	$F_\beta=(C_{10\%}/C_{HCLPF})$
0.3	2.01	1.37
0.4	2.54	1.52
0.5	3.20	1.69
0.6	4.04	1.87

For structures such as the spent fuel pool, β typically ranges from 0.3 to 0.5. Ref. 10 shows that over this range of β , the computed seismic risk is not very sensitive to β . Therefore, I recommend using a midpoint value for β of 0.4.

Step 2: Determine hazard exceedance frequency $H_{10\%}$, that corresponds to $C_{10\%}$ from the hazard curve.

Step 3: Determine seismic risk P_F from:

$$P_F = 0.5 H_{10\%} (7)$$

Table 1 presents the Peak Spectral Acceleration PSA seismic hazard estimates from Ref. 8 and 9 (LLNL93 results) for the Vermont Yankee and Robinson sites. In order to accurately estimate the seismic risk for a seismic HCLPF capacity C_{HCLPF} of:

$$C_{HCLPF} = 1.2g \text{ PSA} = 1176 \text{ cm/sec}^2 \text{ PSA} (8)$$

associated with Screening Level 2 for the Vermont Yankee site by rigorous convolution, it is necessary to extrapolate the Ref. 9 hazard estimates down to the 2×10^{-8} exceedance frequency. Also, intermediate values in Table 1 have been obtained by interpolation.

Table 2 compares the seismic risk of spent fuel pool failure for these two sites as estimated by the following three methods:

1. Ref. 1 simplified approach, i.e., Eqn. (3).

2. Ref. 10 simplified approach, i.e., Steps 1 through 3 above.
3. Rigorous convolution of the hazard and fragility estimates.

For all three approaches the Screening Level 2 HCLPF capacity defined by Eqn. (8) was used. In addition, for both the Ref. 10 and rigorous convolution approaches, a fragility logarithmic standard deviation β of 0.4 was used.

From Table 2, it can be seen that the Ref. 1 method (Eqn. (3)) underestimates the seismic risk by factors of 2.3 and 3.5 for Vermont Yankee and Robinson, respectively. The simplified approach recommended in Ref. 10 and described herein overestimates the seismic risk by 20% and 5% respectively for these two cases. These results are consistent with the results I have obtained for many other cases.

4.2 Estimated Seismic Risk of Spent Fuel Pools Screened at Screening Level 2 Using Mean LL93 Hazard Estimates from Ref. 8 and 9

Using the Ref. 10 simplified approach described in the previous subsection, I have estimated the spent fuel pool seismic risk of failure corresponding to Screening Level 2 for all 69 CEUS sites with LLNL93 seismic hazard estimates defined in Refs. 8 and 9. These sites are defined in terms of an NRC site number code (OCSP_) used in Ref. 9. For each site, I assumed that the HCLPF capacity C_{HCLPF} was defined by Eqn. (8). A total of 35 of the 69 sites had estimated seismic risks of spent fuel pool failure associated with Screening Level 2 of greater than 1×10^{-6} . The estimated seismic risk of 26 of these sites exceeded 1.25×10^{-6} . These 26 sites with their estimated seismic risk corresponding to Screening Level 2 are listed in Table 3. As can be seen in Table 3, only 8 of the 69 sites had estimated seismic risks of spent fuel pool failure exceeding 3×10^{-6} . One of these sites is Shoreham at which no fuel exists.

It should be noted that the seismic risks of spent fuel pool failure tabulated in Table 3 are based on the assumption that the HCLPF capacity of the spent fuel pool exactly equals the Screening Level 2 HCLPF capacity of 1.2g PSA (equivalent to 0.5g PGA). In actuality, spent fuel pools which pass the appropriately defined screening criteria are likely to have capacities higher than the screening level capacity. Therefore these are upper bound seismic risk estimates for spent fuel pools that pass the to-be established screening criteria. Furthermore, the simplified approach used to estimate the seismic risks in Table 3 overestimates these risks by 0% to 25%.

4.3 Estimated Seismic Risk of Spent Fuel Pools Screened at Screening Level 2 Using Mean EPRI89 Hazard Estimates

Following the exact same Ref. 10 simplified approach which I followed for the LLNL93 hazard estimates, Ref. 11 provides the corresponding seismic risk of spent fuel pool failure estimates based upon EPRI89 hazard estimates for 60 of the 69 CEUS sites. Table 3 shows the corresponding seismic risk computed in Ref. 11 for the EPRI89 hazard estimates.

From Table 3, it can be seen that the EPRI89 hazard estimates produce generally

much lower seismic risk estimates corresponding to Screening Level 2 than do the LLNL93 hazard estimates. Based on the EPRI89 hazard estimates, only one site has a seismic risk exceeding 1×10^{-6} . Only three other sites have seismic risks exceeding 0.5×10^{-6} . Table 3 includes all sites for which the computed seismic risk exceeds 0.5×10^{-6} based on the mean EPRI89 hazard estimates.

5. Conclusions

If based on the mean LLNL93 hazard estimates (Ref. 8 and 9) it is acceptable to have up to a mean 3×10^{-6} annual seismic risk of spent fuel pool failure at the screening level, then Screening Level 2 defined in Section 3 represents a practical screening level. Only 8 of the 69 sites have computed seismic risks greater than 3×10^{-6} at this screening level. Screening Level 2 is set at a peak 5% damped spectral acceleration (PSA) level of 1.2g (equivalent to a PGA level of 0.5g).

Based on the mean EPRI89 hazard estimates (Ref. 11), Screening Level 2 would generally result in seismic risk of spent fuel pool failure estimates less than 0.5×10^{-6} for spent fuel pools which passed the screening criteria. Only 4 out of 60 sites have computed seismic risks greater than 0.5×10^{-6} at this screening level.

The screening criteria given in Refs. 4 and 7 represent a good start on developing screening criteria for spent fuel pools at Screening Level 2. However, I have three significant concerns which are discussed in Sections 3.1 through 3.3. In my judgment, a detailed fragility review of a few spent fuel pools will be necessary in order to address my concerns. These reviews should concentrate on aboveground spent fuel pools with walls not backed by soil backfill. I believe these reviews need to be performed before a set of screening criteria can be finalized at Screening Level 2.

References

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9. *Extension to Longer Return Periods of LLNL Spectral Acceleration Seismic Hazard Curves for 69 Sites*, provided by Engineering Research Applications Branch, Nuclear Regulatory Commission, September, 1999
10. Kennedy, R.P., *Overview of Methods for Seismic PRA and Margin Assessments Including Recent Innovations*, CSNI Seismic Risk Workshop, Tokyo, Japan, August 1999
11. Personal Communication from Tom O'Hara, Duke Engineering and Services to Robert Kennedy, October 19, 1999

Table 1
Seismic Hazard Estimates for Peak Spectral Acceleration for PSA
From Refs. 8 and 9 (LLNL 93 Results)

Exceedance Frequency H	Peak Spectral Acceleration PSA (cm/sec. ²)		
	Vermont Yankee	Robinson	
1x10 ⁻³	93	232	
5x10 ⁻⁴	151	369	
2x10 ⁻⁴	246	676	
1x10 ⁻⁴	354	991	
5x10 ⁻⁵	501	1349	*
2x10 ⁻⁵	759	2054	*
1x10 ⁻⁵	1058	2801	
5x10 ⁻⁶	1396	3915	*
2x10 ⁻⁶	1884	6096	*
1x10 ⁻⁶	2308	8522	
5x10 ⁻⁷	2661	--	**
2x10 ⁻⁷	3330	--	**
1x10 ⁻⁷	3802	--	**
5x10 ⁻⁸	4266	--	**
2x10 ⁻⁸	5248	--	**

* By Interpolation

** By Extrapolation

Table 2
Comparison of Seismic Risk Estimated by Various Approaches

$$C_{HCLPF} = 1.2g \text{ PSA}, \quad \beta = 0.4$$

Site	Computed Seismic Risk P _F (to be multiplied by 10 ⁻⁶)		
	Ref. 1 Method Eqn. (3)	Ref. 10 Method Steps 1 through 3	Rigorous Convolution
Vermont Yankee	0.38	1.07	0.89
Robinson	3.7	13.6	13.0

Table 3
Seismic Risk Associated With Screening Level 2

$C_{HCLPF} = 1.2g$ Peak Spectral Acceleration

Site Number	Annual Seismic-Induced Probability of Failure P_F (to be multiplied by 10^{-6})	
	LLNL93 Hazard	EPRI89 Hazard
36	13.6	0.14
18	8.3	1.9
25	6.6	0.57
8	5.5	0.21
43	4.5	0.12
59	4.4	*
21	4.2	*
62	4.1	*
27	2.9	0.38
49	2.8	0.27
40	2.5	0.10
16	2.5	0.14
38	2.3	0.21
63	2.2	0.06
54	2.2	0.26
19	1.8	0.17
32	1.8	0.17
28	1.7	0.04
4	1.6	*
50	1.5	0.20
44	1.5	*
20	1.5	0.55
31	1.4	0.06
39	1.4	0.14
14	1.3	0.60
13	1.3	0.33

Not Available

Appendix A

**Extension to Longer Return Periods of LLNL Spectral Acceleration
Seismic Hazard Curves for 69 Sites**

Site Number Key

**Spectral Acceleration Hazard Estimates
For 69 Sites Listed by Site
Number (OCSP_)**

*spectral accelerations are given in cm/sec^2 units