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**REFERENCE:** Request for Comments on Draft Regulatory Guide DG-3021, "Site Evaluations and Determination of Design Earthquake Ground Motion for Seismic Design of Independent Spent Fuel Storage Installations and Monitored Retrievable Storage Installations"

Ladies and Gentlemen:

Carolina Power & Light (CP&L) Company and Florida Power Corporation (FPC) submit the following comments on the Draft Regulatory Guide DG-3021, "Site Evaluations and Determination of Design Earthquake Ground Motion for Seismic Design of Independent Spent Fuel Storage Installations and Monitored Retrievable Storage Installations".

Comment 1

Lines 91-95 of Draft DG-3021 states, "To determine the DE in the CEUS, an accepted PSHA methodology with a range of credible alternative input interpretations should be used. For sites in the CEUS, the seismic hazard methods, the data developed, and seismic sources identified by Lawrence Livermore National Laboratory and the Electric Power Research Institute (EPRI) have been reviewed and are acceptable to the staff."

However, lines 159-163 and lines 211-215 indicate that new investigations should be used to determine whether there are "any new data or interpretations" not included in the current PSHA databases. This is inconsistent the statement made in lines 91-95. Revise lines 159-163 and lines 211-215 to state the conclusion of lines 91-95.

Comment 2

Lines 84-88 of Draft DG-3021 states, "For ISFSI sites that are co-located with existing nuclear power generating stations, the level of effort will depend on the availability and quality of existing evaluations. In performing this evaluation, the applicant should evaluate whether new data require re-evaluation of previously accepted seismic sources and potential adverse impact on the existing seismic design bases of the nuclear power plant." Lines 152-154 also imply the same message.


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F-RIDS = ADM-03  
Cdd = T. Clark (TLC1)  
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These sections of DG-3021 should be modified to reflect the fact that the licensee maintains the option of using the existing seismic design bases for these co-located situations. It may also be beneficial to define "co-located".

Thank you for the opportunity to provide comments on this issue. Please contact me at (919) 546-6901 should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Terry C. Morton". The signature is written in a cursive style with a prominent horizontal line above the "M" and "o" in "Morton".

Terry C. Morton  
Manager - Performance  
Evaluation & Regulatory Affairs

DSL