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MEMORANDUM

G consulting sctentlsts and engineers TO: FROM: DATE: **MFG PROJECT:** 180734 Dr. A. K. Ibrahim, U.S. Nuclear Regulatory Commission Roslyn Stern, Clint Strachan September 7,2004 **SUBJECT: Sequoyah Fuels Corporation Site, Seismicity Issues** COPY: Craig Harlin, Sequoyah Fuels Corporation

This memorandum has been prepared to address the seismicity issues discussed in our conference call on July 20, 2004. In this conference call, five technical issues were identified for additional clarification, as a follow-up to the June 22, 2004 response to the NRC Request for Additional Information (RAT) (SFC, 2004). These technical issues are outlined below.

1. **Lawson, 1985 Paper**

As requested, a copy of the 1985 paper by J. E. Lawson is'attached with this memorandum, entitled "Expected Earthquake Ground-Motion Parameters at the Arcadia, Oklahoma Dam Site, SP 85-1."

2. **Site Acceleration** Values **from** Random **Earthquake Analyses**

As requested, we verified the values in the table entitled Site Accelerations from Random Earthquakes Within the Ozark Uplift, using Atkinson and Boore (1995) Attenuation Relationships from Enclosure 3 of June 22, 2004 RAI response. In particular, the 0.27 g value for 10,000-year recurrence interval earthquake occurring 3.5 miles (5.7 km) from site was verified.

As shown in Table 1 below, an earthquake magnitude of 4.4 corresponds to a 1 0,000-year event occurring within a 5-mile radius of the site. As discussed below (in comment 5), a circle with a 5-mile radius has a mean radius of 3.5 miles. Attenuation relationships have been developed to predict the ground motion at a site as a function of peak ground motion and distance. One such relationship, developed by Campbell (1981), is shown in Table 2. This relationship was developed using worldwide earthquakes. Atkinson and Boore (1995) proposed a relationship based on data from southeastern Canada and northeastern United States. They provide two methods for predicting attenuation relations: 1) a "simplified" quadratic equation, and 2) a list of tabulated values. The table is considered more accurate, but a less functional form that requires interpolating between tabulated values. Using the quadratic equation approximation presented in Atkinson and Boore, the resulting peak ground acceleration is 0.27 g as shown in Table 3. In

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addition, Campbell (2003) developed a new relationship to predict ground motion in the eastern United States by using an empirical method based on western North America that has been adjusted using stochastic and theoretical methods to model ground motions in eastern North America. These values are shown in Table 4. Values from the Atkinson and Boore (1995) quadratic equation, as given in the June "22, 2004 RAI response, are considered most applicable because the range of input parameters for the \mathbb{Q} equation best fits the range of input parameters of the random earthquake study.

Table 1. Probabilistic Assessment of Random Earthquakes Within the Ozark Uplift*

*From Table 4.7 of MFG (2003a); values in fraction of gravitational acceleration (g).

Table 2. Site Accelerations from Random Earthquakes Within the Ozark Uplift, using Campbell (1981) Attenuation Relationships^{*}

*From Table 4.7 of MFG (2003a); values in fraction of gravitational acceleration (g).

Grayed values indicate values calculated using input parameters outside the intended range of input values.

Table 3. Site Accelerations from Random Earthquakes Within the Ozark Uplift, using Atkinson and Boore (1995) Attenuation Relationships (Ouadratic Equation)^{*}

*Modified from Table 4.7 of MFG (2003a); values in fraction of gravitational acceleration (g).

Grayed values indicate values calculated using input parameters outside the intended range of input values.

Table 4. Site Accelerations from Random Earthquakes Within the Ozark Uplift, using Campbell (2003) Attenuation Relationships'

'Modified from Table 4.7 of MFG (2003a); values in fraction of gravitational acceleration (g).

Gravted values indicate values calculated using input parameters outside the intended range of input values.

3. Peak Acceleration Summary Table

The table entitled Peak Accelerations Associated with Seismic Events in the June 22 2004 RAI response show peak accelerations associated with all known faults considered as active faults using the updated attenuation equation. As included in Table 5, the peak accelerations calculated from the MCE associated with all known faults considered as active faults increased by up to a factor of three when the Campbell (2003) and Atkinson and Boore (1995) attenuation relations are used.

Table **5.** Peak Accelerations Associated With Seismic Events*

*Modified from Table 5.1 of MFG (2003a) and Table in June 22,2004 RAI; values in fraction of gravitational acceleration (g).

A comparison of the peak accelerations using different attenuation relationships is shown in attached Table A.1.

In the Facility Seismicity -Evaluation' report (MFG, 2003), all known faults in the site area were conservatively considered as active faults to eliminate questions about whether or not a particular fault was potentially active (capable). When the Atkinson and Boore (1995) and Campbell (2003) relationships were used, this conservative approach results in relatively high peak accelerations at the site. These peak accelerations are not consistent with the measured seismic activity in this relatively inactive area of Oklahoma.

A more detailed literature review of potentially active (capable) faults in the area was conducted to assess the potential impact on peak site acceleration. Since it has previously been shown that the disposal cell' can withstand an acceleration of 0.27 g (June 22, 2004 RAI response, from random earthquake analysis), only faults that could produce accelerations greater than 0.27 g, if active, are considered further. The Campbell (2003) relation is used because it is the latest relationship found in the literature for eastern United States and has input parameters (magnitude and distance) that are similar to those in Table A.1. The considered faults are presented in Table 6.

In the 1970's, the Black Fox Nuclear Power Plants Units 1 and 2 were approved for construction, with the projects canceled in 1982 during construction permit review. However, extensive geology and seismic evaluations had been conducted and the Safety Evaluation Report had been submitted. The Black Fox proposed site was near Inola, Oklahoma, approximately 60 miles north of the SFC site, on the western flank of the Ozark Uplift. Therefore, there is considerable overlap in the study regions of the two sites. The majority of the faults listed in Table 6 fall within the 50-mile radius study area of the Black Fox site, and all are within the 200-mile radius study area. In fact, all of the original faults listed in Table A.1 are located within the 200-mile radius study area of the Black Fox report.

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Table 6 Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults with Potential Horizontal Accelerations Greater than 0.27 g.

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(1) OU = Ozark Uplift; AB = Arkoma Basin; CP = Cherokee Platform

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As shown in Table 6, the faults of interest fall within one of three tectonic provinces: Ozark Uplift, Cherokee Platform, or Arkoma Basin. In the Black Fox report, ages of faults were estimated using surface geological studies, reconnaissance photogeologic evaluations, published subsurface data, analyses of limited amounts of oil and gas well drilling data, and field review of selected structures. As discussed in the Black Fox Geotechnical Investigations, and paraphrased below, no faults within the study area of these provinces are considered capable. Selected sections of the Black Fox Geotechnical Investigation are included as an attachment to this memo.

Ozark Uplift. There are only a few cases in the western Ozark Uplift where there is field evidence that can closely date the fault movement. In these cases, the latest fault movements are dated as post-Mississippian and pre-middle Pennsylvanian in age. Faults in the southwestern part of the Ozark uplift that are overlain by undisturbed Quaternary terrace deposits along the Verdigris and Arkansas Rivers are estimated as older than 0.6 million years. Indirect evidence of age of the Ozark Uplift faults is seen in the relationship of topography to faulting. "While some of the faults have a strong effect on the. general alignment of stream valleys, topographic offset equivalent to the stratigraphic displacement is lacking. In fact, post-faulting erosion has, in some places, produced topographic ridges on the downthrown side of faults where the downdropped rocks are more resistant to erosion than those in the adjacent upthrown block. This type of evidence indicates that a considerable lapse of time has occurred in these locations since the latest movements on the faults." As stated in the Black Fox report, faulting within the Ozark Uplift is interpreted to have ceased by the end of Permian time (225 million years before present).

Cherokee Basin-Central Oklahoma Platform Province. Published subsurface studies of the province within Oklahoma indicate that structural relief is much greater in pre-Middle Pennsylvanian rock than it is at the surface in rocks of that age. This decrease in fold amplitude indicates that the most important period of folding and faulting may have occurred prior to late Middle Pennsylvanian time.. Photogeologic reconnaissance of a part of this province adjacent to the Black Fox site indicates that no deformation of Quaternary beds overlying Pennsylvanian rocks (along the Arkansas River) has taken place. None of the surface faults in this province are believed to be capable faults.

Arkoma Basin Province. As stated in the Black Fox report, faulting and folding in the Arkoma Basin began during deposition of Atokan and early Desmoinesian strata, as indicated by numerous. unconformities and conglomerates in this section and by the thinning of strata over growing folds. The youngest rocks within the basin, of middle Desmoinesian strata, are folded and faulted. In a general sense, the latest age of movement on faults in this province is established by the unconformable overlap of the entire province by Mesozoic and Cenozoic strata of the Mississippi Embayment in eastern Arkansas. In addition, the close relationship between the structures of the Ouachita Mountains Uplift and those of the Arkoma Basin indicates a broad similarity in age of the structures in these provinces. The deposition of Cretaceous strata over a profound erosional unconformity along the south flanks of the. Ouachita Mountains Uplift places an upper limit on the major period of deformation in southern Oklahoma. The only evident post-Cretaceous structural activity appears to have been mild uplift of the region. Within this framework of regional structural history, there is no evidence that any of the surface faults in this province have been active since before Cretaceous time (135 million years before present).

Because none of the faults listed in Table 6 are considered active, the upper limit of the peak horizontal acceleration considering all other known faults to be active can be estimated to be 0.27 g or less (equal to of less) than the peak horizontal acceleration based on the random earthquake analysis). There are no known faults that meet the minimum length-requirements (set by 10 CFR 100 Appendix A III) that are not covered by the 200-mile radius study area of the Black Fox report. The Black Fox report found no evidence of any active faults. Crone and Wheeler (2000) indicate the only active faults in the study area

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are the Meers fault and the Humboldt fault zone. As shown in Table 5, the peak horizontal acceleration due to these faults is 0.019 g.

Based on random earthquake analyses, existing faults, and recorded seismic events, the design peak horizontal acceleration is 0.27 g. This compares to a design Safe Shutdown Earthquake (SSE) of 0.12 g. acceleration for the Black Fox site (Shannon and Wilson, 1975). 'Likewise, the random earthquake analysis for the Arcadia Dam site (located approximately 130 miles west of SFC site) determined a peak ground acceleration of 0.12 g based on a 2000-year recurrence interval and a 95 % non-exceedance probability.

4. **Potential For Ground-Motion Amplification**

In order to confirm that amplification of ground motion is not anticipated as seismic waves are propagated upward through the sedimentary rocks underlying the disposal cell site, more information regarding the soil profile is provided. The disposal cell will be constructed on sandstone and siltstone units of the Pennsylvanian Atoka Formation. Geologic cross sections of the site area with these units and'their geologic descriptions are provided in MFG (2002). The SFC site is located at the top of the drainage in the area, so that unconsolidated soil-like materials on top of the Atoka Formation rocks are of limited thickness. Terrace deposits and highly weathered portions of the Atoka Formation in the site area are on the order of ten to twenty feet thick. In addition, most of these surficial soils in the disposal cell area will be excavated during subsoil cleanup operations and placed and compacted in the disposal cell during site reclamation.

The underlying Atoka Formation units are of the same geologic age and the same geophysical province as the Pennsylvanian units evaluated in the Black Fox Geotechnical Investigation. Measured shear wave velocities at Black Fox were greater than 2,000 feet per second in the upper weathered zone (20 to 30 feet thick), and were greater than 4,000 feet per second below the weathered zone.

The National Earthquake Hazard Reduction Program (FEMA, 1995) and the International Building Code (IBCO, 2000) site class definitions for these'materials are site class B in the upper 20 to 30 feet, and site class A below this depth. The corresponding ground-motion amplification through these materials is expected to be negligible.

5. Mean **Circle Radius**

The mean circle radius used in evaluating the random earthquake event roughly followed the procedure described in the Lawson (1985) paper that is included as an attachment to this memo.

As described in the Facility Seismicity Evaluation (MFG, 2003), historical earthquake events were ranked according to magnitude for each tectonic province. The spatial distribution of the earthquakes is uniform across the province. From this data, a magnitude versus frequency relationship is developed. However, because of the characteristics of a uniform distribution, a larger province area will have more data, and therefore, a larger projected magnitude for a given recurrence interval. For a uniform distribution, if the area in question were cut in half, the historical occurrence of earthquakes would also be cut in half. Also with a uniform distribution, the magnitude versus frequency relationship becomes zero at a point. For example, the probability of having a 5.0 magnitude earthquake at a finite point at the site is infinitesimally small. However, the probability of having this same earthquake within 20 miles of the site is quantifiable, and the probability of having that earthquake within 200 miles of the site is greater than the probability of the event occurring within 20 miles of the site.

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In order to correct for the bias to province area, the magnitude versus frequency relationship must be corrected for area. In the Lawson (1985) paper, frequency relationships were divided by $1,000 \text{ km}^2$ in order to normalize the data of larger provinces. Rather than normalize the data to $1,000 \text{ km}^2$, frequency relationships were normalized to 1 km^2 for this study. However, to use the attenuation relationships developed by Campbell (2003), Atkinson and Boore (1995), and others, a definable distance between the site and the epicenter of a seismic event is required. The magnitude associated with a certain recurrence interval applies to an area, not a point. Assuming the site itself is at the center of the area in question, the radius r_0 is the radius of a circle within which an earthquake of magnitude M will have a certain probability of occurring. To apply the event at the site would provide unrealistically high accelerations, while to apply it at the outer limits of the area (i.e. at r_0) would be unconservative. Therefore, the event was applied at the mean radius of the circle ($\sqrt{2}$ r₀). This mean radius represents the radius at which half the area within the circle is located closer to the site, and half the area within the circle is located farther from the site.

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Attachment 2

Table A.1 Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults

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Table A.1. Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults

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Table A.1. Maximum Credible Earthquake and Site Ground Vibratory Motion for Critical Faults (cont)

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Fault ID corresponds to numbers shown on Figures 3.3 through 3.7 of the MFG (2003) Facility Seismicity Evaluation.

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