

July 6, 2006

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Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20005-0001

RE: Comments to Draft Interim Staff Guidance Document HLWRS-ISG-01 Review
Methodology for Seismically Initiated Event Sequences

To Whom It May Concern:

As one of ten units of local government designated by the Secretary of Energy as potentially affected by the Yucca Mountain Repository System, Lincoln County, Nevada appreciates the opportunity to review and provide comments to NRC's Draft Interim Staff Guidance Document HLWRS-ISG-01 Review Methodology for Seismically Initiated Event Sequences, a request for said comments having been published by NRC in the Federal Register at Page 29369 on May 22, 2006. As a downwind locality, Lincoln County is concerned with the potential for atmospheric exposure to radionuclides originating at the Yucca Mountain project.

HLWRS-ISG-01 "provides an example methodology" to review seismically initiated event sequences. It is unclear if the guidance directs NRC staff to utilize the suggested methodology or merely offers same as an alternative among possible methods. To reduce uncertainty, it would be helpful if NRC provided explicit guidance as to how the selection of an appropriate methodology would be made, and when, if at all, a given methodology might be unacceptable for use. The discretion in choice of methods appears to introduce unwarranted ambiguity and uncertainty.

Lincoln County notes that the NRC decision to approve the use of the methodology which is similar to the one outlined in ASCE 43-05 appears to be based upon its recent use in licensing of the Mixed-Oxide Fuel Fabrication Facility at the Savannah River Site. We understand that the MOX facility has a projected operating life of 20-40 years and assume that the NRC operating license is for the same period of time. Given that the preclosure operating period for the Yucca Mountain site is at least 100 years, we are concerned about the ability of ASCE 43-05 to appropriately account for uncertainty over the longer timeframe for Yucca Mountain. NRC should assure itself that the methodology suggested by ASCE 43-05 can produce accurate results over the 100-year plus operating life of the Yucca Mountain project. This issue should be addressed in the final staff guidance.

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The proposed changes to the Yucca Mountain Review Plan (YMRP) may not adequately address or require consideration of the geometric consequence of closely-spaced recurring seismic events. The example provided in Appendix A raises questions as to whether NRC has adequately considered the geometric consequence of closely-spaced recurring seismic events in determining the mean seismic hazard and related failure probability of a structure, system or component (SCS) important to safety (ITS). HLWRS-ISG-01 may need to be revised to ensure that such characteristics of seismic hazard and related failure probability are appropriately considered in computing SCS ITS probability of failure during a seismic event.

Sincerely,

Lea Rasura
Coordinator

Cc: Board of Lincoln County Commissioners
Caliente City Council
Joint City/County Impact Alleviation Committee
Mike L. Baughman, Ph.D., Intertech Services Corporation