

July 7, 2006

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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:

White Pine County, Nevada has reviewed and is providing 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 designated by the Secretary of Energy as potentially affected by the Yucca Mountain Repository System, White Pine County is concerned with the potential for atmospheric exposure to radionuclides originating at the Yucca Mountain project.

The decision by NRC to approve the use of the methodology which is similar to the one outlined in ASCE 43-05 appears based upon the method's recent use in licensing of the Mixed-Oxide Fuel Fabrication Facility at the Savannah River Site. The MOX facility has a projected operating life of 20-40 years and we assume that the NRC operating license is for the same period of time. White Pine County is concerned about the ability of ASCE 43-05 to appropriately account for uncertainty over the longer timeframe for Yucca Mountain, given that the preclosure operating period for the repository project is at least 100 years. NRC should ensure 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.

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 and/or the Yucca Mountain Review Plan (YMRP) 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,

Mike Simon  
Director

Cc: Board of White Pine County Commissioners