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Date: 4/4/2007 3:08:18 PM
Subject: Southern Nuclear Operating Company (SNC) Early Site Permit (ESP) Application for the Vogtle

ESP Site Summary of Telephone Call Held on March 9, 2007 to Discuss Site Safety Analysis Report (SSAR) Section 2.5

To: Stephanie Coffin
From: Stephen R. Monarque
Date: April 4, 2007
Accession No.: ML070720622

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Subject: Southern Nuclear Operating Company (SNC) Early Site Permit (ESP) Application for the Vogtle
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Security:	Standard

March 30, 2007

MEMORANDUM TO: Stephanie M. Coffin, Branch Chief
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

FROM: Stephen R. Monarque, Project Manager **/RA/**
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: SOUTHERN NUCLEAR OPERATING COMPANY (SNC) EARLY SITE PERMIT (ESP) APPLICATION FOR THE VOGTLE ESP SITE-SUMMARY OF TELEPHONE CALL HELD ON MARCH 9, 2007 TO DISCUSS SITE SAFETY ANALYSIS REPORT (SSAR) SECTION 2.5

This memorandum documents a telephone conference call between the U.S. Nuclear Regulatory Commission (NRC) staff and Southern Nuclear Operating Company on March 9, 2007. The purpose of this call was to discuss the NRC staff's request for additional information pertaining to Section 2.5 of the Vogtle early site permit application. A summary of this call held is enclosed.

Docket No. 52-011

Enclosure:
As stated

MEMORANDUM TO: Stephanie M. Coffin, Branch Chief
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

FROM: Stephen R. Monarque, Project Manager **/RA/**
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Office of New Reactors

SUBJECT: SOUTHERN NUCLEAR OPERATING COMPANY (SNC) EARLY SITE PERMIT (ESP) APPLICATION FOR THE VOGTLE ESP SITE-SUMMARY OF TELEPHONE CALL HELD ON MARCH 9, 2007 TO DISCUSS SITE SAFETY ANALYSIS REPORT (SSAR) SECTION 2.5

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Docket No. 52-011

Enclosure:
As stated

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DATE	03/29/07	03/29/07	03/30/07

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Telephone Call Summary

Subject: Request for Additional Information (RAI) Letter on Section 2.5, "Geology"

Date of Call: March 9, 2007

Participants

NRC	Applicant	Betchel	WLA	USGS
Stephen Monarque	Jim Davis	John Prebula	Scott Lindvall	Tony Carlos
Cliff Munson	Don Moore	Greg Kasel	Bill Lettis	Russ Wheeler
Christian Araguas		Bob Prunty		
Yong Li		Joe Litehiser		
G. Stirewalt		Dave Fenster		
Laura Bauer		John Davie		
Sara Gonzalez		Jose Clemente		
T. Terry				
Tom Chang				
W. Wang				

Referenced documents

Title
NRC staff's Draft RAI on Vogtle Early Site Permit Site Safety Analysis Report (SSAR) Section 2.5.

Actions

Topic	NRC	Applicant
RAI Letter on Geology	Revise several questions and issue RAI to SNC.	Upon receipt of NRC staff's RAI, provide timely response to NRC staff's RAI.

Other Discussion

On March 9, 2007, the U.S. Nuclear Regulatory Commission (NRC) staff and Southern Nuclear Operating Company (SNC) conducted a conference call to discuss the NRC's request for additional information (RAI) on the geology at Vogtle. SNC requested this conference call in order to clearly define the specific information the NRC staff needed to complete its geology review. Refer to Enclosure 2 for draft RAI on Section 2.5. As a result of this call, the NRC staff agreed to make the following changes to the RAI: Revised 2.5.1-11 to request figures that distinguish the liquefaction features related to the 1886 Charleston earthquake from each of the proposed paleoliquefaction events A, B C', E', and F'; revised 2.5.2-1 to specify the request for a comparison with the Charleston seismic source zone and to include a reference to Regulatory

Guide 1.165; revised 2.5.2-3 b. to specify a weight value of 0.5 or larger; revised 2.5.2-7 to specify a unit of measurement for the extent of liquefaction; revised 2.5.2-8 to clarify the NRC staff's request for justification from a large single event C' from a single source; and revised 2.5.2-14 to add a question regarding the applicability of an M_{max} value of M_w 7.5 for the Eastern Tennessee Seismic Zone. In addition, the NRC staff agreed to delete questions 2.5.2-20 d. and 2.5.4-7 as this information was already contained in the Site Safety Analysis Report. Renumbered questions 2.5.2-1 through 2.5.2-21 as 2.5.2-4 through 2.5.2-24.

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(Revised 3/28/07)

DRAFT REQUEST FOR ADDITIONAL INFORMATION FOR VOGTLE EARLY SITE PERMIT (ESP)

SITE SAFETY ANALYSIS REPORT (SSAR), SECTION 2.5

RAI Number	Reviewer	Full Text
2.5.1-1	G. Stirewalt	Section 2.5.1.1.3.5 of the site safety analysis report (SSAR), under "Quaternary Surfaces and Deposits", identifies a series of four abandoned fluvial terrace levels (i.e., Qty, Qtb, Qte, and Qto from youngest to oldest) that occur in the site area above Quaternary alluvium of the present-day flood plain of the Savannah River (SSAR Figure 2.5.1-29), and acknowledges that such features ideally can be used to evaluate Quaternary deformation. a. Please indicate whether these terraces are regional in extent, or whether they only occur locally and mainly in the vicinity of the Pen Branch Fault. b. Please provide information on proposed origin of these fluvial terraces.
2.5.1-2	G. Stirewalt	Section 2.5.1.1.3.5 of the SSAR, under "Quaternary Surfaces and Deposits", states that terrace Qtb ranges from 8-13 m (26-43 ft) above the Savannah River surface at the Savannah River Site, and also indicates that terrace Qte shows a range in surface elevation from 17-25m (56-82 ft) above the Savannah River surface. Section 2.5.1.2.4.3 of the SSAR indicates a detectable resolution limit for observable deformation of terrace Qte of about 3 ft (pg 2.5.1-79), suggesting that less than 3 ft of warping or tilting of this terrace surface would not be detected. a. Please provide information to address whether the elevation ranges noted above suggest tilting of terrace surfaces. b. Please discuss implications of a deformation detection limit of about 3 ft (1 m) for these fluvial terraces.

2.5.1-3	G. Stirewalt	Section 2.5.1.1.3.5 of the SSAR describes terrace Qty, positioned between the modern-day flood plain of the Savannah River and the next oldest overlying terrace (Qtb) as “minor and not laterally continuous”. Terrace Qty occurs along a stretch of the Savannah River that is relatively straight (SSAR Figure 2.5.1-29) where the river is incised, and appears to be mainly located southeast of the postulated surface trace of the Pen Branch Fault. Section 2.5.1.1.3.5 reports that terrace Qtb, immediately overlying Qty, is about 90,000 years old (Pleistocene) based on correlation, relative position, and morphology. Brooks and Sassaman (1990) suggested an age of 4,000 years for the modern-day flood plain. This information suggests that Qty, the lowest and youngest terrace, could be between 4,000 - 90,000 years old and therefore possibly Holocene in age. Considering origin, location, and approximate age of terrace Qty, please discuss the implications for possible Quaternary displacement on the Pen Branch Fault.
2.5.1-4	G. Stirewalt	SSAR Figure 2.5.1-29 shows the Savannah River to be relatively straight in the site area in the vicinity of (i.e., southeast of) the proposed surface trace of the Pen Branch Fault. Section 2.5.1.2.1 of the SSAR describes the Savannah as incised at that location. Please provide information to address why the Savannah River is straight and incised at a position that appears to correspond with the location of the Pen Branch Fault “block” on the southeastern side of the fault.
2.5.1-5	G. Stirewalt USGS	In Section 2.5.1.1.4.3, rocks of the Augusta and Modoc fault zones are described as containing both mylonitic (i.e., ductile) and brittle deformation fabrics. While the mylonitic fabric is clearly of Alleghanian age, there is no explanation of whether the brittle fabric is the result of late-stage Alleghanian deformation along these zones, either at shallower depths or lower slip rates; cross-cuts the mylonitic fabric and the product of later-stage folding or unloading rather than fault movement; or the result of a much younger, more recent episode of fault movement along the mylonitic zones. For both faults, please provide information on characteristics of the mylonitic and brittle fabrics (including textural, petrologic, structural, and orientation data or other evidence that may constrain age of the brittle deformation) which demonstrates that the brittle fabric likely did not form during a post-Alleghanian deformation event, e.g., during the Quaternary, or at least during the present-day stress regime.

2.5.1-6	G. Stirewalt	For faults listed under “Other Paleozoic Faults” in SSAR Section 2.5.1.1.4.3, the Central Piedmont Suture and the Eastern Piedmont Fault System are not shown in Figure 2.5.1-14. Please correct Figure 2.5.1-14 to include these two faults since others listed are shown therein.
2.5.1-7	G. Stirewalt USGS	In Section 2.5.1.1.4.3, the Grenville Front is not described under “Regional Geophysical Anomalies and Lineations”, although it is listed among the features occurring within 200 mi of the Vogtle Electric Generating Station (VEGP) site and shown in SSAR Figure 2.5.1-12. Please describe this regional feature, including whether or not is considered to be a potential seismic source and the basis for the conclusion.
2.5.1-8	G. Stirewalt USGS	Of the six regional geophysical anomalies and lineaments listed in SSAR Section 2.5.1.1.4.3, information is presented to explain why only the East Coast and Blake Spur magnetic anomalies are not considered as potential seismic sources. Discussions of the New York-Alabama, Clingman, and Ocoee lineaments do not indicate whether or not they could be potential seismic sources. Also, locations of the Clingman and Ocoee Lineaments and the Ocoee Block are not illustrated in Figure 2.5.1-12, and earthquakes interpreted by Wheeler (1996) as occurring within the Ocoee block in the “modern” tectonic setting were not quantified in regard to age of faulting with which these earthquakes were associated. (SSAR Section 2.5.1.1.4.6 includes a discussion of the Eastern Tennessee Seismic Zone in which seismic events are related to the Ocoee block.) a. Please correct Figure 2.5.1-12 to include the Clingman and Ocoee Lineaments and the Ocoee Block. b. Please indicate age of the ”modern” tectonic setting in regard to whether faults in that setting are potential seismically capable structures to be considered for the VEGP site, and explain whether or not these three lineaments are specifically considered to be potential seismic sources and the basis for the conclusion.

2.5.1-9	USGS	Section 2.5.1.1.4.3, S.C. describes Regional Mesozoic Tectonic Structures and states that normal faults which "bound Triassic basins may be listric into the Paleozoic detachments faults (Dennis et al., 2004) or may penetrate through the crust as high-angle faults." The distinction between these basin-bounding faults being listric or penetrating through the crust as high-angle faults is crucial to their potential for generating large-magnitude earthquakes. a. Please discuss the evidence related to whether or not these structures could extend through the crust to depths where large-magnitude earthquakes commonly nucleate. b. Please explain how the distinction between listric and high-angle fault geometries is treated in the probabilistic seismic hazard assessment (PSHA), and explain how the difference between the two geometries would affect hazard at the site. Alternatively, cross-reference an SSAR section that provides the explanation.
2.5.1-10	USGS	Section 2.5.1.1.4.3 discusses the Belair Fault and indicates that this structure is likely a tear fault or lateral ramp in the hanging wall of the Augusta fault zone. Age constraints on last movement of the Belair Fault are sometime between post-late Eocene and pre-26,000 years ago (Prowell, 2005). Thus, the Belair Fault is one of the few structures in the region with interpreted evidence of late Cenozoic movement (SSAR Figures 2.5.1-3 and 2.5.1-13). If the Belair is a tear fault or lateral ramp associated with the Augusta fault zone, then movement on the Belair may be related to movement on the larger, regional-scale Augusta fault. Please explain how inference of possible Cenozoic movement on the Belair Fault and its possible association with the Augusta fault zone might affect seismic hazard at the Vogtle site.
2.5.1-11	L. Bauer	Figure 2.5.1-19 of SSAR Section 2.5.1.1.4.4 is important for illustrating what is known or inferred about which liquefaction features may be related to the 1886 Charleston earthquake vs other past earthquake events, and for evaluating proximity of individual features to proposed sources. Please develop a new figure, or revise Figure 2.5.1-19, to clearly distinguish liquefaction features related to the 1886 Charleston earthquake vs other past events to enable evaluation of proximity of individual features to proposed sources.

2.5.1-12	USGS	SSAR Section 2.5.1.1.4.4 discusses Charleston Tectonic Features and cites Figure 2.5.1-18. The isoseismal contour lines for the 1886 Charleston earthquake in this figure are attributed to Bollinger (1977), but this reference is not included in the list of references for Section 2.5.1. Please include Bollinger (1977) in the list of references cited.
2.5.1-13	G. Stirewalt	SSAR Section 2.5.1.1.4.4 describes all faults that occur within the meizoseismal area for the 1886 Charleston earthquake, except the Gants and Drayton Faults. Please provide a description of these two faults since they are shown in SSAR Figures 2.5.1-19 and 2.5.1-20.
2.5.1-14	G. Stirewalt	SSAR Section 2.5.1.1.4.5 discusses faults postulated for the Savannah River Site (SRS) by Cumbest et al (1998) which are illustrated in SSAR Figure 2.5.1-22. Density of faults shown in this figure suggests there may be faults at the VEGP site which have not yet been identified. Please address the issue of why density of faults on the eastern side of the Savannah River around the SRS is much greater than that currently shown for the VEGP site on the western side of the river, and the implication for seismic hazard at the early site permit (ESP) site.
2.5.1-15	G. Stirewalt	SSAR Section 2.5.1.1.4.5 on SRS Tectonic Features does not summarize pertinent information collected from the SRS that was used to define fault traces at the SRS and draw the conclusion, presented in SSAR Sections 2.5.1.2.4 and 2.5.3.1.3, that no faults, in particular the Pen Branch, are capable features at the VEGP site. a. Please provide a concise summary of definitive data collected at the SRS, including direct evidence from borings and seismic profiles, which demonstrate that the Pen Branch Fault is not a capable structure at the SRS. b. Please compare data collected and analyses performed for the SRS to demonstrate most recent movement on the Pen Branch fault with data and analyses employed to make this determination for the VEGP site, leading to the conclusion that the Pen Branch Fault is not a capable structure at the VEGP site.

2.5.1-16	USGS	Section 2.5.1.2.4 discusses faults in the site area that involve deformation of basement rocks. The Steel Creek fault is not considered to be a capable tectonic source, but this conclusion is not substantiated. Please provide information and references that support the conclusion that the Steel Creek Fault is not a capable source.
2.5.1-17	G. Stirewalt	In the brief history of the Pen Branch Fault presented in SSAR Section 2.5.1.2.4.1, there is no reference to the suggestion of Hanson et al (1993) that possible rejuvenation of drainage along traces of the Pen Branch and Steel Creek Faults on the SRS may suggest either local tectonic uplift along these faults or non-tectonic geologic or geomorphic processes. Please discuss this suggestion of possible displacement along the Pen Branch Fault in relation to potential implications for the VEGP site.
2.5.1-18	G. Stirewalt	SSAR Section 2.5.1.2.4.2 states that the Pen Branch Fault at the VEGP site is made up of two specific fault segments trending N45E and N34E with a dip of 45SE. Cumbest et al (2000) reported a N46-66E range in strike of the Pen Branch Fault at the SRS. Please discuss whether or not either fault segment at the VEGP site is favorably oriented to experience slip in response to the existing regional stress field defined by Moos and Zobach (2001).

2.5.2-1	S. Gonzalez/ Y. Li	SSAR Section 2.5.2.2.2.4 describes the updated Charleston seismic source model (UCSS). Please justify your rationale for using the Senior Seismic Hazard Analysis Committee (SSHAC) Level 2 methodology for the UCSS update. In addition, please describe the implementation of the SSHAC Level 2 methodology. Specifically, how were the expert's opinions integrated into the development of the final UCSS model, how were any conflicting opinions between the experts dealt with, and how does the final source model represent the informed consensus of the community beyond those selected for the UCSS update? In addition, please provide a comparison of your SSHAC Level 2 UCSS update with Level 3 and 4 SSHAC updates. What additional benefit would have been gained by Level 3 or 4 updates?
2.5.2-2	USGS	SSAR Sections 2.5.1.1.4.6 and 2.5.2.2.1 the range of M_{max} values developed by each Earth Science Team (EST) are given as m_b. Please provide a table for converting values of m_b to M_w by the equations used for the SSAR.
2.5.2-3	USGS	SSAR Section 2.5.2.2.1 summarizes the Electric Power Research Institute (EPRI) source zones that include the site, and the M_{max} values and weights that each EPRI EST assigned to these source zones. M_{max} values of the zones have a weighted mean of about M_w 6.0. M_{max} values of M_w 7.5 and larger were assigned low probabilities that average 0.08. In contrast, the USGS national seismic-hazard maps utilize an M_{max} that is based on (1) A.C. Johnston's (1994, EPRI) survey of large earthquakes worldwide in areas that are tectonically similar to the U.S. east of the Rockies,and on (2) L. Kanter's (1994, EPRI) final assessments of the tectonic setting of each earthquake. The 1996, 2002, and 2007 USGS national hazard maps use M_{max} of M_w 7.5 with high weights for the area that includes the site. a. Please explain whether or not the Johnston (1994) findings, the final versions of the Kanter (1994) assessments, and USGS's use of them as support for high M_{max}, constitute new information that requires an update of the 1989 EPRI PSHA, and why. b. Please demonstrate the effect that using an M_{max} of M_w 7.5 would have on the hazard at the Vogtle site.

2.5.2-4	USGS	SSAR Section 2.5.2.2.2.3 (page 2.5.2-16) states that the results of the Lawrence Livermore National Laboratory Trial Implementation Project (TIP) study are not explicitly included in the SSAR because the study was as much "a test of the methodology as a real estimate of seismic hazard". Please provide more detail explaining why the TIP results were not used.
2.5.2-5	USGS	SSAR Section 2.5.2.2.2.4.1 states that the characteristics of the 1886 Charleston earthquake, and the greatest density of prehistoric liquefaction features, taken together "show that future earthquakes having magnitudes comparable to the Charleston earthquake of 1886 most likely will occur within the area defined by Geometry A. A weight of 0.7 is assigned to Geometry A …" (page 2.5.2-18). Additionally, Figure 2.5.2-9 indicates no likelihood that an 1886-sized earthquake has occurred inland from the coastal region, except along Geometry C, and then only with a probability of 0.1. a. Please summarize the age, liquefaction susceptibility, and geographic distribution of liquefiable deposits in the zone 50-150 km inland from the coast, and explain whether this information supports a negligible probability of large inland earthquakes. b. Please reconcile a negligible probability of large inland earthquakes, as indicated in Figure 2.5.2-9, with the discovery of prehistoric liquefaction features as much as 100 km inland in fluvial deposits of the Edisto River (Obermeier, 1996, *in* McCalpin, J., ed., "Paleoseismology", Fig. 7.6; same figure is Fig. 11 in Engineering Geology, 1996, v. 44, p. 1-76).
2.5.2-6	USGS	SSAR Section 2.5.2.2.2.4.3 suggests that the liquefaction features attributed to a single large, prehistoric earthquake might actually have been produced by several moderate-magnitude earthquakes that are closely spaced in time (page 2.5.2-26). Please determine whether Talwani or Obermeier have data on sizes of prehistoric liquefaction craters, and whether these or any related data might constrain the possible magnitudes of the prehistoric earthquakes.

2.5.2-7	L. Bauer	SSAR Section 2.5.2.2.2.4.3 states that liquefaction from the 1886 Charleston earthquake is preserved in geologic deposits at numerous locations and that liquefaction deposits from earlier earthquakes are preserved in the region. For each of the pre-1886 events please summarize the number of liquefaction features and sites that have been documented, the areal extent of liquefaction, how many dates have been collected, and how well the features correlate from one site to the next.
2.5.2-8	L. Bauer	SSAR Section 2.5.2.2.2.4.3 states that paleo-liquefaction Event C is defined by features north of Charleston while Event D is defined by sites south of Charleston. Events C and D are combined as a single large event C'. Please provide any information on liquefaction features, geographically located between these two area, that have similar radiocarbon ages. Provide justification that although the 2-sigma calibrated dates overlap, there is enough paleoliquefaction data to support a single large event C' form a single source, or if it is more likely to reflect smaller, moderate-magnitude earthquakes closely spaced in time?
2.5.2-9	S. Gonzalez/ USGS	SSAR Section 2.5.2.2.2.4.3 describes the calculation of two average recurrence intervals covering two different time intervals, which are used as two recurrence branches on the logic tree. Please justify in greater detail your rationale for the weighting of the two recurrence branches on the logic tree. In addition, please discuss the possibility of a third scenario that the geologic record is incomplete and that that 550-year recurrence interval for the past 2,000 years does apply to the entire 5,000-yr-long geologic record of paleoearthquakes. In this scenario, 10 large-magnitude earthquakes would have occurred at approximately regular intervals during the past 5,000 years. Please also discuss the potential impacts of this scenario on the hazard calculation for the Vogtle ESP site.
2.5.2-10	C. Munson/ Y. Li	SSAR Section 2.5.2.4.4 states that "the new interpretation of the Charleston source indicates that a source of the large earthquakes in the Charleston area exists with weight 1.0..." Although the UCSS update of the Charleston source zone covers a fairly large area, the weighting and source geometries give the largest hazard only inside Zone A (either 0.9 (A, B, B') or 1.0 (A, B, B', C)), which is a relatively small zone. In view of this result, provide justification for the UCSS source geometries and weighting scheme and define what is meant by the "Charleston area".

2.5.2-11	Y. Li	SSAR Section 2.5.2.2.2.4.1 states that the width of Geometry B is 80 km. However, SSAR Figure 2.5.2-9 shows the width of Geometry B to be approximately 100 km. Please provide the actual dimensions of Geometry B used for the updated Charleston seismic source model (UCSS).
2.5.2-12	Y. Li	As stated in SSAR Section 2.5.2.2.2.4.1 the offshore Helena Banks fault zone was detected by multiple seismic reflection profiles. Please explain why the two seismic events (mb 3.5 and 4.4) in 2002, which occurred in the vicinity of the Helena Bank fault system, cannot be positively correlated with the fault zone, and did not demonstrate recent activity for the fault zone. Can the seismicity symbolize the reactivation of the Helena Bank fault zone?
2.5.2-13	S. Gonzalez	SSAR Section 2.5.2.2.2.5 discusses the Eastern Tennessee Seismic Zone (ETSZ). Please provide, electronically, the geographic coordinates defining the geometry of the ETSZ seismic source zones and associated seismicity parameters (including M_{max} magnitude distributions) for each EPRI-SOG EST.
2.5.2-14	S. Gonzalez/ USGS	SSAR Section 2.5.2.2.2.5 discusses the ETSZ. Please justify in greater detail your rationale for not updating the ETSZ as characterized by the EPRI ESTs. In addition, please discuss how the M_{max} magnitude distributions developed by each EST compare with more recent M_{max} estimates by the USGS hazard model (Frankel et al 2002) and Bollinger (1992). SSAR Section 2.5.2.2.2.5 states that the ETSZ does not contribute significantly to the hazard at the VEGP site. Please explain whether and how this would change if the EST's source zones representing the ETSZ were assigned a single M_{max} of M_w 7.5.
2.5.2-15	S. Gonzalez	SSAR Section 2.5.2.4.2 describes the effects of the new regional earthquake catalog. Figure 2.5.2-16 shows the two areas used to examine the effect of the new seismicity information. Please provide a justification for the geometries of the two areas.

2.5.2-16	S. Gonzalez	SSAR Section 2.5.2.5.1 describes the development of the site amplification functions and the soil uniform hazard response spectra (UHRS) for the 10^{-4} and 10^{-5} hazard levels. Please provide a detailed step-by step discussion of the methodology used to develop the site amplification functions (i.e. Steps 1 to 6 in SSAR Section 2.5.2.5.1.1) and the 10^{-4} and 10^{-5} soil UHRS. If possible, please illustrate each step with relevant data. In addition, please discuss the following: a. In Step 5 of SSAR Section 2.5.2.5.1.1, what does the "envelope motion" refer to? b. In Step 6, please explain why either the high- or low-frequency mean amplification factor was used instead of their envelope? c. Step 6 states that "at some intermediate frequencies between 2 and 8 Hz, the high frequency (HF) and low frequency (LF) soil amplification factors (AF) are weighted in order to achieve a smooth transition between HF and LF spectra". Please provide more information regarding this weighting procedure.
2.5.2-17	S. Gonzalez	SSAR Section 2.5.2.5.1.3 describes the development of low- and high- frequency target spectra using the average of the single and double corner source models from NUREG/CR-6728. Please explain why the 2004 EPRI (EPRI 1009684 2004) ground motion models were not used instead.
2.5.2-18	S. Gonzalez	SSAR Table 2.5.2-17 provides the computed and recommended Mbar and Dbar values used for the development of the high- and low-frequency target response spectra. Please explain how the "recommended" Dbar and Mbar values were calculated.

2.5.2-19	S. Gonzalez	SSAR Section 2.5.2.5.1.4 describes the spectral matching of the selected seed time histories to the target response spectra and states that the "spectral matching criteria given in NUREG/CR-6728 (McGuire et al. 2001) were used to check the average spectrum from the 30 time histories for a given frequency range (high- or low-frequency) and annual probability level. This is the recommended procedure in NUREG/CR-6728 (McGuire et al. 2001) when multiple time histories are being generated and used." In addition, Section 2.5.2.5.1.5 states that "Each of the 60 randomized soil profiles were paired with 30 seed time histories (each time history was applied to two of the randomized soil profiles)". Please provide a justification for not using the criteria provided NUREG/CR-6728 to check each individual time history against the target spectrum.
2.5.2-20	S. Gonzalez	SSAR Section 2.5.2.5.1.5 describes the results of the site response calculations for the ESP site. Please discuss the results of site response calculations in terms of the following: a. The effects of the six alternative site response profiles in terms of the different depths to the top of the Paleozoic crystalline rocks. b. The possible effects of the Pen Branch fault zone (i.e. as a low velocity zone or weak zone). c. The effects of the low velocity zones within the Blue Bluff Marl and Lower Sand Stratum. d. The observed differences between the SRS and EPRI shear modulus reduction and damping curves. In addition, please justify the adequacy of using an equivalent-linear approach rather than a nonlinear approach to model site response at the ESP site.

2.5.2-21	S. Gonzalez	SSAR Sections 2.5.2.7.1.1 to 2.5.2.7.1.3 describe the development of vertical-to-horizontal response spectral (V/H) ratios based on the results of NUREG/CR-6728 and Lee (2001). a. Please justify your rationale for assigning the approximate weights of 1:3 to the respective "near" and "far" estimates of $V/H_{CEUS,Soil}$. b. Please discuss the similarities and differences between the site-specific soil profile used by Lee (2001) and the Vogtle ESP site response profile. c. Please justify in greater detail your rationale for the relative weights assigned to the NUREG/CR-6728 and Lee (2001) results and the final smoothing. In addition, SSAR Section 2.5.2.7.1.3 states that "both results give minimum V/H values, particularly in the lower frequencies, which appear lower than engineering judgment may suggest acceptable in the current state-of-knowledge". Please explain the meaning of this statement in more detail and it's implication for the final ESP site V/H ratios.
2.5.3-1	G. Stirewalt	SSAR Sections 2.5.3.1.2 and 2.5.3.1.7 refer to features mapped by McDowell and Houser (1933) and Bartholomew et al (2002), including "clastic dikes", that these authors interpreted as possibly related to tectonism during late Eocene to late Miocene. These features are attributed to a non-tectonic origin in SSAR Sections 2.5.3.1.2, 2.5.3.1.7, and 2.5.3.8.2.2 without any discussion of the field evidence for this conclusion. Please discuss criteria used to determine that these features are non-tectonic in origin and related to pedogenic soil-forming processes, including a comparison with characteristics of clastic dikes mapped in trenches in the site area which are also described as non-tectonic features in the SSAR.

2.5.3-2	G. Stirewalt & USGS	SSAR Sections 2.5.3.8.2.1 and 2.5.3.8.2.2 discuss features interpreted to be non-tectonic in origin that include warped bedding, fractures, small-scale faults, injected sand dikes, and clastic dikes. Warped bedding, fractures, small-scale faults, and injected sand dikes are interpreted to indicate local dissolution of the underlying Utley Limestone and resultant plastic and brittle collapse of overlying Tertiary sediments which occurred more than 10,000 years ago. No formation mechanism is described for the injected sand dikes. The clastic dikes are interpreted to result from weathering and pedogenic soil-forming processes that were enhanced along older fractures initially produced by dissolution of the underlying Utley Limestone. a. Please describe where these non-tectonic features are located relative to the proposed trace of the Pen Branch Fault at the VEGP site. b. Please discuss field data, observations, and reasoning which resulted in the conclusion about a dissolution origin for the warped bedding, fractures, small-scale faults, and injected sand dikes, including a specific explanation of the formation mechanism for the injected dikes. c. Please discuss field data, observations, and reasoning which resulted in the conclusion that the injected sand and clastic dikes do not represent a response to Quaternary or Holocene earthquakes.
2.5.4-1	T. Cheng	SSAR Section 2.5.4.2.2 states that information has been taken from the 14 borings and 10 cone penetrometer tests (CPTs) performed during the ESP subsurface investigation. However, Section 2.2.1 of Appendix 2.5A, “Geotechnical and Laboratory Testing Data Report,” to SSAR Section 2.5 states that twelve borings, designated B-1001 through B-1011 and B-1013, were drilled at the site. Please clarify this inconsistency and also describe how the other two borings were taken.

2.5.4-2	T. Cheng	SSAR Section 2.5.4.2.1 states that the Upper Sand Stratum (Group 1 soils) will be completely removed and replaced with compacted structural fill prior to the construction of VEGP Units 3 and 4. SSAR Section 2.5.4.5.3 describes the sources and quality control of the structural fill. 1. Please explain whether the excavation and backfill will cover only the foot-print of the power block or extend to certain distance from the foundation footprint. 2. If the site excavations will not extend to significant distances to the side of the plant, shouldn't the seismic hazard calculations be also carried to the free-ground surface including the Barnwell Group in the base-case site soil columns? What is basis for this column analysis which presumes that the fill extends uniformly in all horizontal directions, while the actual excavation and backfill will extend only in the immediate vicinity of the plant? (Page 2.5.2-39) 3. SSAR Section 2.5.4.5.3 states that backfill will be placed with as much as 25% fines. This is significantly higher fines content than used for building foundations. How will compaction controls be implemented for such materials?

2.5.4-3	T. Cheng	According to Table 2 of Appendix A to Appendix 2.5A of the SSAR, only four borings (B-1002, B1003, B1004 and B-1005) went through the Blue Bluff Marl material (Group 2 Zone) and reached the Lower sand Stratum (Group 3 Zone - coarse-to fine sand with interbedded thin seams of silt and/or clay). Since the top layer of soil (Group 1 soil) will be removed and backfilled with compacted structural fill prior to the construction of VEGP Units 3 and 4, only the information collected from these four borings can be used for the investigation of Group 2 and Group 3 soil which are supposed to be the primary load-bearing component of safety-related facilities. Please provide justification for the following: a. With the data from four borings and no significant samples taken in Group 3 zone, what is the basis for the development of geotechnical parameters of Groups 2 and 3 layers? b. SSAR Section 2.5.2.5.1.2 indicates that base case soil velocity profiles together with their uncertainty were developed from the available data. If only 12 borings were taken at the site, and most of these borings did not extend to depths below 300 ft, how were these parameters developed? c. Are there any indications of soft zones in the upper soils of the profile above the Blue Bluff Marl which may be collapsible under a seismic event, as encountered at the Savannah site? Even though soils under the foundation footprint are to be removed, how far to the side of the plant does collapsibility become unimportant? d. Soft soils were indicated in the lower soils below the Blue Bluff Marl. Standard Penetration Test (SPT) blow counts for the lower sands in B-1002 are indicated to be as low as 10 bpf (Page “4 of 6" of Soil Test Boring Record of Appendix A to Mactec’s report). Please explain what is the implication of such low values even though the average blow count through this material is indicated to be about 60 bpf?

2.5.4-4	T. Cheng	SSAR Section 2.5.2.5.1.2 states that the backfill shear wave velocities were determined from measurements made on the existing backfill at the site under Units 1 and 2 as summarized in Tables 2.5.4-10 and 2.5.4-11. As indicated in these tables, the shear velocities in the top layers of backfill are well below 1,000 fps. How were shear wave velocity values generated at depths of 50 ft or more below the top of the backfill? Were effects of confinement considered?
2.5.4-5	T. Cheng	SSAR Section 2.5.4.7.2.1 (Page 2.5.4-27) indicates that the EPRI 1993 soil degradation relationships were used to perform SHAKE analyses and derive the shear modulus reduction factors. It is the staff's understanding that the appropriateness of using the EPRI 1993 curves for fine-grained soils is not obvious since they were generally developed for sands and but not fine grained silts or clays. (The degradation models at the Savannah River site were generated from laboratory testing of in-situ soils.) The staff requests the applicant to explain what would be the significance of using such models for fine-grained soils on the computed results?
2.5.4-6	T. Cheng	Regarding the ground water control, SSAR Sections 2.5.4.5 and 2.5.4.6 states that (1) the total depth of construction excavation to the Blue Bluff Marl bearing stratum will range from approximately 80 to 90 ft below ground surface (SSAR Section 2.5.4.5.1), (2) the groundwater generally occurs at a depth of about 60 ft below the existing ground surface (SSAR Section 2.5.4.6.1), and (3) due to the relatively impermeable nature of the Upper Sand Stratum, sump-pumping of ditches will be adequate to dewater the soil. Please explain what dewatering procedures and what criteria will be developed to "minimize effects on the surrounding area and the existing power block"? (The impact of the simple use of sumps and pumps on any existing area of the site will depend on the extent of time during which drawdown will occur.)
2.5.4-7	T. Cheng	As stated in Section 3.7.1 of the SRP, the maximum hysteretic damping of supporting soil should not be higher than 15 percent. SSAR Figures 2.5.4-11 and 2.5.4-12 indicate that hysteretic damping values at high strain exceed 15 percent. The applicant should provide a justification if hysteretic damping values higher than 15 percent will be used in the analysis.
2.5.4-8	Z. Cruz	SSAR Section 2.5.4.2.2.2 states that 15 UU tests were performed on Blue Bluff Marl samples and that the measured undrained shear strength ranged from 150 to 4,300 psf. Both of these values are significantly lower than the 10,000 psf design value. Please justify the wide range of values and why they differ substantially from the values measured previously for Units 1 and 2. In addition, elaborate on how the SPT N-values measured during the ESP investigations support the use of the 10,000 psf design value.

2.5.4-9	Z. Cruz	SSAR Section 2.5.4.2.2.2 states, “Previous laboratory test results indicate the Blue Bluff Marl to be highly preconsolidated ... the preconsolidation pressure of the Blue Bluff Marl stratum was estimated to be 80,000 psf. Settlements due to loadings from new structures would be small due to this preconsolidation pressure.” a) Provide a description of the “previous” laboratory testing methods and results. b) Justify the assumption of an undrained shear strength of 16,000 psf as UU Test results range from 150 to 4,300 psf. Were consolidation tests performed to verify this assumption? c) The preconsolidation pressure for the Blue Bluff Marl is given as 80,000 psf and is based on the plasticity index values (which ranged from 2 to 70 with an average value of 25) and a PI of 25, which results in a su/p (undrained shear strength / effective preconsolidation pressure) ratio of 0.2. Provide a complete description of the Skempton (1957) method used to determine the ratio of 0.2. Also, justify the use of 0.2 for the ratio in view of the wide range of PI values. In addition, justify the estimated preconsolidation pressure for the Blue Bluff Marl based on the wide range of PI values. d) Justify your conclusion, “settlements due to loadings from new structures would be small due to this preconsolidation pressure,” in view of settlements for the current Units 1 and 2 and also with regard to the su/p ratio of 0.2, which indicates that the soil is under consolidated (0.25 is an indication of normally consolidated soil).
2.5.4-10	Z. Cruz	SSAR Section 2.5.4.2.5.2 cites Bowles (1982) as the reference for determining the effective angle of internal friction for site soils. It is not clear how the effective angle of internal friction was calculated using this reference. Provide an example of a calculation and justify the accuracy of the results in view of the range of N-values.
2.5.4-11	W. Wang	Provide relative densities for each of the soil units.

2.5.4-12	W. Wang	SSAR Section 2.5.4 states that high strain elastic modulus for Upper Sand and Lower Sand Strata were derived based on the Davie and Lewis (1988) relationships. Explain why these relationships are applicable to the ESP soil strata. What is the scientific consensus on Davie and Lewis' relationship between SPT values and elastic modulus as well as the relationship between undrained shear strength and elastic modulus? How extensive are these relationships used?
2.5.4-13	Z. Cruz/ Y. Li	SSAR Table 2.5.4-1 presents average static engineering properties of the subsurface material. Explain how the value for the unit weights for the different soils were obtained. Based on the discussion in the last paragraph on page 2.5.4-10, the average values are higher than those listed in the table. Also, explain why the plasticity index, liquid limit, and plastic limit values are different from those discussed on page 2.5.4-5 for the Blue Bluff Marl.
2.5.4-14	Z. Cruz/ Y. Li	SSAR Section 2.5.4.7 states that: "The EPRI curves were extended beyond the 1 percent strain values reported in EPRI (TR-102293 1993) to 3.3 percent using values provided by Silva (2006)." Provide Silva's values, justification for use of these values, and a detailed description on how the shear modulus and damping curves were extended.
2.5.4-15	Z. Cruz/ Y. Li	Since the Blue Bluff Marl has a relatively high variable fines content (24-77 percent) and saturation level (14-67 percent) and since there is also a potentially high ground motion level at the site, justify why liquefaction analyses were not performed.

2.5.4-16	Z. Cruz/ Y. Li	VEGP ESP SSAR Section 2.5.4.10.2 states that: "For the large mat foundations that support the major power plant structures, general considerations based on geotechnical experience indicate that total settlement should be limited to 2 in., while differential settlement should be limited to ¾ in. **(Peck et al. 1974)**. For footings that support smaller plant components, the total settlement should be limited to 1 in., while the differential settlement should be limited to ½ in. **(Peck et al. 1974)**." a) Provide justification for adopting the Peck et al. (1974) settlement and differential settlement values as guidelines. b) What are the main causes for exceeding these settlement values at the foundation levels for Units 1 and 2? What kind of measures will be taken to prevent settlements and differential settlements for the new units? c) Justify use of an average bearing pressure of 5 ksf for the settlement analyses of compacted fills.
2.5.4-17	T. Terry	SSAR Section 2.5.4.10 provides two general scenarios for bearing capacity and settlement analyses. However, in order to meet the requirements of 10 CFR, Part 50 and 100 the stability of all planned safety-related facilities should be analyzed including bearing capacity, rebound, settlement, and differential settlements under deadloads of fills and plant facilities, as well as lateral loading conditions. Please provide justification for not covering the above information for each planned safety-related structure or indicate that a complete stability analysis will be provided at the construction/operating license (COL) phase.
2.5.4-18	Z. Cruz	SSAR Section 2.5.4.7 states that EPRI Procedure TR-102293 was used to develop the shear modulus and damping curves based on the site shear wave velocities and plasticity index values. Please provide a complete description, including sample calculations, to show how the shear modulus and damping curves were developed and how uncertainties in the site parameters were incorporated into their development.
2.5.4-19	T. Terry	SSAR Section 2.5.4.10.1 provides a brief description of the allowable bearing capacity value, which is based on Terzaghi's bearing capacity equations modified by Vesic (1975). Please provide a more detailed description of how the allowable bearing capacity value was obtained that includes the actual calculations.

2.5.4-20	T. Terry	SSAR Section 2.5.4.11 does not provide the complete design criteria or actual design methods that will be employed. Please indicate whether these will be developed during the COL phase. In addition, Section 2.5.4.11 provides two factors of safety for slope stability with references to Section 2.5.5.2. Neither of these factors of safety are listed in Section 2.5.5. Please explain their omission.
2.5.4-21	T. Terry	SSAR Section 2.5.4 does not provide the relationship of foundations to the underlying materials in the form of plot plans and profiles. In addition, foundation stability with respect to groundwater conditions is not described. Also missing are detailed dewatering plans. Please indicate whether these will be developed during the COL phase.