

**PR 52
(72FR56287)**

From: "Weeks, Jim" <weeks@wai.com>
To: <SECY@nrc.gov>
Date: Mon, Dec 17, 2007 5:15 PM
Subject: Comments Regarding NRC Proposed Rule RIN 3150-AI19

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Weidlinger Associates, Inc. respectfully submits the following comments regarding the NRC's proposed rule regarding Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs, RIN 3150-AI19. These comments are in response to the announcement and request for comments published in the Federal Register/Vol. 72, No. 191/ Wednesday, October 3, 2007/ Proposed Rules.

DOCKETED
USNRC

December 18, 2007 (9:59am)

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1. Recommend the standardization of both Riera functions and explicit aircraft impact models. The loading functions should be standardized to ensure that all plants are evaluated in a similar manner.
2. If the impact is into a "soft" facility, then an explicit aircraft model should be required since use of a Riera function would be meaningless.
3. Recommend requiring validation of both the modelers and the modeling techniques (computer codes) for both aircraft structures and impacted facilities which are identical, or similar to, those being evaluated.
4. Provide specifics regarding the clause "to the extent practicable" for the mitigation of the effects of the impact. Provide additional information describing acceptable risks (or consequences).
5. Recommend that the assessment of the effects of the impact of a large commercial aircraft on the nuclear power plant be performed within the context of an overall multi-hazard assessment of the plant.

The Weidlinger Associates, Inc. point of contact for these comments is:

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Thank-you for considering our input and comments. Weidlinger Associates, Inc. is very interested in this subject, given our expertise and experience in aircraft impact analysis. Please contact me if you have any questions or would like to discuss our comments.

CC: "Tennant, Darren" <tennant@wai.com>, "Levine, Howard" <levine@wai.com>, "Lawver, Darell" <darell@wai.com>, "King, Stephanie" <sking@wai.com>, "Daddazio, Raymond" <daddazio@wai.com>

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