

Industry Comments on Draft Interim Staff Guidance for Seismic Evaluations

December 20, 2007

Enclosure 2

Footnote on page 5 of enclosure 2, amended language to ensure inclusion of the entire soil column:

When the GMRS are determined as free-field outcrop motions on the uppermost in-situ competent material, the site response analysis should be based on the full height of the soil column that includes the soil layers above the uppermost in-situ competent material

Enclosure 3

The industry recommends the addition of a sentence to the end of the second paragraph as follows:

The above OBE definition meets the intent of the requirement associated with OBE in Appendix S to 10 CFR Part 50 that no explicit response or design analyses are required for OBE.

Enclosure 4, Item 2 2nd paragraph

"Since the incorporation of the incoherency effects increases the rotational motions (rocking and torsional), the foundation transfer functions for these motions will be provided when incoherency is included in the soil-structure interaction (SSI) analyses."

This sentence should be deleted for the following reasons:

- (i) It is unclear whether this refers to the Incoherency Transfer Function (the response of the rigid massless foundation, which is only meaningful from the CLASSI analyses) or the response of the foundation after kinematic and inertial interaction.
- (ii) Items 3.3 and 3.4.1 cover the concept that the model should capture the effects of the additional rotations induced by incoherency. So the statement in Item 2 is covered from a performance basis of the model.

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Enclosure 4, Item 5.2

The industry believes the ITAAC provided in approved design certifications are sufficient to demonstrate that the plant will perform in accordance with seismic design considerations including high frequency ground motion. One exception has been identified related to the potential need for a site-specific COL ITAAC on backfill under Category 1 structures.